

**Time and Date**

10.00 am on Tuesday, 18th March, 2025 **(PLEASE NOTE TIME)**

Place

Committee Room 3 - Council House, Coventry

Public business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 5 - 12)
 - (a) To agree the minutes from the meeting of Cabinet on 25 February, 2025
 - (b) Matters arising
4. **Coventry Community Safety Partnership Plan 2025-2028** (Pages 13 - 106)
Report of the Director of Law and Governance
5. **Coventry and Warwickshire Economic Strategy** (Pages 107 - 172)
Report of the Director of Regeneration and Economy
6. **West Midlands Combined Authority Grant Funding to Coventry 2025/26**
(Pages 173 - 192)
Report of the Director of Regeneration and Economy
7. **Local Government Association (LGA) Corporate Peer Challenge 2024 - Outcome of Progress Review** (Pages 193 - 218)
Report of the Chief Executive
8. **2025/26 Transport Capital Programme** (Pages 219 - 242)
Report of the Director of City Services and Commercial
9. **Homes in Multiple Occupation (HMOs) Development Plan Document (DPD) Adoption** (Pages 243 - 342)
Report of the Director of City Services and Commercial

10. **Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996** (Pages 343 - 378)
Report of the Director of Children and Education Services
11. **Holiday Activities and Food Programme 2025: Acceptance of Grant** (Pages 379 - 394)
Report of the Director of Children and Education Services
12. **Family Hub and Start for Life Programme** (Pages 395 - 406)
Report of the Director of Children and Education Services
13. **Re-commissioning of Long-Term Home Support** (Pages 407 - 430)
Report of the Director of Adult Services and Housing
14. **Outstanding Issues**
There are no outstanding issues
15. **Any other items of public business which the Chair decides to take as a matter of urgency because of the special circumstances involved.**

Private business

Nil

Additional Information - Agenda Item 10 - Scrutiny Board 2 Briefing Note - Supporting Children who are unable to attend their Education Setting under Section 19 of the Education Act 1996 (Pages 431 - 432)

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

Monday, 10 March 2025

Note: The person to contact about the agenda and documents for this meeting is Suzanne Bennett, Governance Services, Email: suzanne.bennett@coventry.gov.uk

Membership:

Cabinet Members:

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

Non-voting Deputy Cabinet Members:

Councillors P Akhtar, S Agboola, G Hayre, D Toulson and S Nazir

By invitation:

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

Public Access

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**Suzanne Bennett, Governance Services,
Email: suzanne.bennett@coventry.gov.uk**

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Coventry City Council

Minutes of the Meeting of Cabinet held at 10.00 am on Tuesday, 25 February 2025

Present:

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

Non-Voting Deputy
Cabinet Members: Councillor S Agboola
Councillor P Akhtar
Councillor G Hayre
Councillor S Nazir
Councillor D Toulson

Non-Voting Opposition
Members: Councillor S Gray (Substitute for Councillor Reeves)
Councillor P Male
Councillor G Ridley

Other Non-Voting
Members: Councillor R Lakha
Councillor G Lloyd

Employees
(by Service area):

Chief Executive J Nugent (Chief Executive)

Finance B Hastie (Director of Finance and Resources – Section 151
Officer), P Helm

Law and Governance J Newman (Director of Law and Governance), M Salmon,
A Veness

Apologies: Councillor N Akhtar
Councillor L Bigham
Councillor E Reeves

Public Business

67. Declarations of Interest

There were no disclosable pecuniary interests.

68. **Minutes**

The minutes of the meeting held on 11th February 2025 were agreed and signed as a true record. There were no matters arising.

69. **Council Tax Setting 2025/26**

Cabinet considered a report of the Director of Finance and Resources (Section 151 Officer), which would also be considered by Council at its meeting on 25th February 2025, that calculated the Council Tax level for 2025/26 and made appropriate recommendations to Council, consistent with the Budget Report 2025/26.

The report recommends a 4.9% increase in the City's Council Tax. Some figures and information, shaded grey in the report, were provisional due to precepts not having been confirmed at the time of publication. These figures were confirmed as final at the meeting and confirmed as accurate.

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

The report included a calculation of the Band D Council Tax that would be needed to generate this Council Tax requirement, based on the City's approved Council Tax base. The 2025/26 Band D Council Tax that was calculated through this process had increased by £99.11 from the 2024/25 level.

Each year the Government determined the maximum Council Tax increases that local authorities could set without triggering a referendum. For 2025/26, Coventry City Council's Council Tax must be below 5%, comprising a 2% precept for expenditure on adult social care and a maximum of 3% for other expenditure. The recommendations within the Budget Report 2025/26 were based on a proposed increase in Council Tax of 4.9%, incorporating a core Council Tax rise of 2.9% and a 2% Adult Social Care Precept.

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

RESOLVED that Cabinet recommended to Council the approval of recommendations (1) to (5) below, to:

(1) To note the following Council Tax base amounts for the year 2025/26, as approved by Cabinet on 7 January 2025, in accordance with Regulations made under Section 31B of the Local Government Finance Act 1992 ("the Act"):

- a) 90,062.6 being the amount calculated by the Council as its Council Tax base for the year for the whole Council area;**

g)

Coventry (unparished area)	£2,103.42
Allesley	£2,140.85
Finham	£2,116.96
Keresley	£2,124.55

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

h)

Valuation Band	Parts to which no special item relates	Parish of Allesley	Parish of Finham	Parish of Keresley
	£	£	£	£
A	1,402.28	1,427.23	1,411.31	1,416.37
B	1,635.99	1,665.10	1,646.52	1,652.42
C	1,869.71	1,902.98	1,881.75	1,888.49
D	2,103.42	2,140.85	2,116.96	2,124.55
E	2,570.85	2,616.60	2,587.40	2,596.68
F	3,038.27	3,092.34	3,057.83	3,068.79
G	3,505.70	3,568.08	3,528.27	3,540.92
H	4,206.84	4,281.70	4,233.92	4,249.10

being the amounts given by multiplying the amounts at (2)(g) above by the number which, in the proportion set out in Section 5(1) of the Act, is applicable to dwellings listed in a particular valuation band divided by the number which in that proportion is applicable to dwellings listed in valuation Band D, calculated by the Council, in accordance with Section 36(1) of the Act, as the amounts to be taken into account for the year in respect of categories of dwelling listed in different valuation bands.

(3) To note that for the year 2025/26 the Police and Crime Commissioner for the West Midlands and West Midlands Fire Authority have stated the following amounts in precepts issued to the Council, in accordance with Section 40 of the Act, for each of the categories of dwelling shown below:

Valuation Band	Police and Crime Commissioner for the West Midlands	West Midlands Fire Authority
	£	£
A	153.00	53.46
B	178.50	62.37
C	204.00	71.28
D	229.50	80.19
E	280.50	98.01
F	331.50	115.83
G	382.50	133.65
H	459.00	160.38

(4) That having calculated the aggregate in each case of the amounts at (2)(h) and (3) above, the Council, in accordance with Sections 30 and 36 of the Act, hereby sets the following amounts as the amounts of Council Tax for the year 2025/26 for each part of its area and for each of the categories of dwellings shown below:

Valuation Band	Parts to which no special item relates	Parish of Allesley	Parish of Finham	Parish of Keresley
	£	£	£	£
A	1,608.74	1,633.69	1,617.77	1,622.83
B	1,876.86	1,905.97	1,887.39	1,893.29
C	2,144.99	2,178.26	2,157.03	2,163.77
D	2,413.11	2,450.54	2,426.65	2,434.24
E	2,949.36	2,995.11	2,965.91	2,975.19
F	3,485.60	3,539.67	3,505.16	3,516.12
G	4,021.85	4,084.23	4,044.42	4,057.07
H	4,826.22	4,901.08	4,853.30	4,868.48

(5) That the Council determines that its relevant basic amount of Council Tax for 2025/26 is not excessive in accordance with the principles set out in the Secretary of State's report, under Sections 52ZC and 52ZD of the Act.

70. Budget Report 2025/26

Cabinet considered a report of the Director of Finance and Resources (Section 151 Officer), which would also be considered at the meeting of Council on 25th February 2025, that followed on from the Pre-Budget Report approved by Cabinet on 10th December 2024 (minute 44/24 referred) which had since been subject to a period of public consultation. The proposals within the report would now form the basis of the Council's final revenue and capital budget for 2025/26 incorporating the following details:

- Gross budgeted spend of £961.9m (£94.0m or 11% higher than 2024/25).
- Net budgeted spend of £296.7m (£19.3m or 7% higher than 2024/25) funded from Council Tax and Business Rates less a tariff payment of £22.2m due to the Government.

- A Council Tax Requirement of £189.5m (£13.6m or 8% higher than 2024/25), reflecting a City Council Tax increase of 4.9% detailed in the separate Council Tax Setting report on today's agenda.
- A number of new expenditure pressures, policy proposals and technical savings proposals.
- A Capital Strategy including a Capital Programme of £171.6m including expenditure funded by Prudential Borrowing of £55.3m.
- An updated Treasury Management Strategy, Capital Strategy, and a Commercial Investments Strategy.

The financial position in this Budget Report was based on the Final 2025/26 Local Government Finance Settlement published on 3rd February 2025. This settlement still only provided a one-year focus for 2025-26 with no detail for local government finances beyond this. However, in response to significant lobbying by Local Government, it was now being recognised that the current methodology and much of the data that fed into it was out of date and therefore, the Government have begun a consultation process into Local Authority Funding Reform, with the intention that a new system, intended to reflect need, could be implemented from 2026/27.

In advance of this reform the 2025/26 Local Government Finance Settlement had addressed some of the disparity in the current system with new grants including the new one-off Recovery Grant (£9.6m), targeted towards areas with greater need and demand for services, and the new Childrens Social Care Prevention Grant (£2.2m), distributed through a new children's needs-based formula which estimated the need for Childrens Social Care Services. Coventry also received an additional £6.2m Social Care Grant. Compared to the assumptions within the pre-budget report, this represented an additional £10.5m of resources in the settlement.

With the promise of funding reform, it was difficult to provide a robust medium term financial forecast at this stage and the Council had instead made some planning estimates for future years. Initial assumptions recognise the likelihood that gaps would remain for the periods following 2025/26. The view of the Director of Finance and Resources (Section 151 Officer) was that the Council should be planning for such a position.

The Pre-Budget Report was based on an increase in Council Tax of 4.9% and this position had been maintained for the final proposals in this report. This incorporated an increase of 2.9%, which was within the Government's limit of 3% above which a referendum would need to be held plus a further 2% Adult Social Care (ASC) Precept in line with Government expectations. The precept was essential to enable councils including Coventry to manage increases in the costs of care. In total, the rise in Council Tax bills would be the equivalent of around £1.72 a week for a typical Coventry household including the expected rises in the precepts for Police and Fire.

The Council had closed the significant financial gap for 2025/26 which it had at the start of the Budget process. Measures to achieving this included the identification of additional Council Tax resources, a range of technical adjustments and newly identified cost savings or income streams. All these proposals were set out in detail in Appendix 2 to the report. Where these were different to the proposals that

were included in the Pre-Budget Report, this had been indicated within Appendix 2 to the report and shown in tables 2 and 3 within section 2.2 of this report. Due to the additional resources received within the final settlement on 3rd February 2025, several savings options had been removed from the final budget proposals in response to consultation engagement and petitions heard by Members.

The proposals did not provide the Council with a balanced budget beyond 2025/26. The Council's current medium term bottom line incorporated a combination of future inflationary and service pressures and the fall-out of uncertain specific grant resources. Some of the future funding assumptions were speculative at this stage and would be revised towards the end of 2025 as any changes to local government finance resulting from the Local Authority Funding Reform consultation and 2026/27 Settlement were made known. The initial approach would however be dictated by an intention to review and update technical information as it became available to the Council and to identify further efficiencies from, or generate further income within, Council services. Through 2025, the Council would continue to refine and implement a programme of activity designed to review how best to deliver its services, improve integration between some of them and optimise the effectiveness of others.

The Council's Medium Term Financial Strategy (MTFS) included as Appendix 1 to the report, set out the financial planning foundations that supported the setting of the Council's revenue and capital budgets, including the policy assumptions and financial management framework that underpinned the strategy. The purpose of the MTFS was to describe the environment within which the Council operated and bring together resource and cost projections to explain how the Council planned to address its funding gap, whilst retaining focus on its strategic priorities.

The recommended Capital Programme proposals were a key part of the Council's approach and amounts to £171.6m in 2025/26. The proposals reflected the Council's ambitions for the city and included: extensive highways infrastructure works including specific schemes relating to continued delivery of the City Region Sustainable Transport Settlement (CRSTS) Programme that included transport packages for the Foleshill and London Road corridor; construction and operation of a 220m long single track demonstrator known as the Live Environment Construction Test (LECT); the continuation of City Centre Cultural Gateway; progressing the City Centre South redevelopment; and the delivery of the Woodlands School Project. Over the next 5 years the Capital Programme was estimated at a total of £510m as part of on-going investment delivered by and through the City Council.

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

RESOLVED that Cabinet recommends to Council the approval of recommendations (1) to (7) below, to:

- (1) Approve the Medium-Term Financial Strategy in Appendix 1 to the report, as the basis of its medium-term financial planning process.**
- (2) Approve the Budget proposals in Appendix 2 to the report, after due consideration of the consultation responses set out in Appendix 7 and Appendix 8 to the report and the Equality Impact Assessment set out in Appendix 10 to 15.**
- (3) Approve the total gross 2025/26 revenue budget of £962m in Table 1 of the report and Appendix 3 to the report, established in line with a 4.9% City Council Tax increase and the Council Tax Requirement recommended in the Council Tax Setting Report considered on today's agenda.**
- (4) Note the Director of Finance and Resources (Section 151 Officer) comments confirming the adequacy of reserves and robustness of the budget in Section 5.1.2 and 5.1.3 of the report.**
- (5) Approve the Capital Strategy incorporating the Capital Programme of £171.6m for 2025/26 and the forward commitments arising from this programme totalling £510m between 2025/26 to 2029/30 detailed in Section 2.3 of the report and Appendix 4 to the report.**
- (6) Approve the addition to the capital programme of up to £1.1m grant funding from Arts Council England to contribute towards delivery of the City Centre Cultural Gateway scheme detailed in Section 2.3.4 of the report and Appendix 4 to the report.**
- (7) Approve the Council's Treasury Management Strategy and Minimum Revenue Provision Statement for 2025/26 in Section 2.4 of the report and the Prudential Indicators and limits described and detailed in Appendix 6 to the report, the Commercial Investment Strategy for 2025/26 in Section 2.5 of the report and Appendix 5 to the report and the Commercial Investment Indicators detailed in Appendix 6 to the report.**

71. Outstanding Issues

There were no outstanding issues.

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

There were no other items of public business.

(Meeting closed at: 10.02am)



Public report

Cabinet

Cabinet
Council

18th March 2025
25th March 2025

Name of Cabinet Member:

Cabinet Member of Policing and Equalities – Councillor A S Khan

Director approving submission of the report:

Director of Law and Governance.

Ward(s) affected:

All

Title: Coventry Community Safety Partnership Plan 2025-2028

Is this a key decision?

No

Executive summary:

Community Safety Partnerships (CSPs) are the statutory body that bring together local partners to solve shared issues around Crime and Disorder, Anti-Social Behaviour (ASB), Drug and Alcohol misuse, and Reoffending.

CSPs are required to develop an overarching Community Safety Partnership Plan under the Crime and Disorder Act 1998. The plan provides an overview of the work and priority areas that fall under the responsibility of the Coventry Community Safety Partnership (CCSP).

The plan is intended to focus on those issues of most concern to residents, that cause the most harm to communities and require a coordinated approach to deliver lasting change.

The Coventry Community Safety Partnership Plan has been informed by:

- the views of residents, including those who have been affected by crime and/or accessing services;
- analysis of the problem, drawing on data and information from a breadth of partners;
- evidence of “what works” in tackling crime and disorder; and
- the views of professionals and stakeholders working locally.

To help inform the Plan a 12-week public consultation was undertaken between the 10th July 2024 and the 2nd October 2024. Workshops were held by the sub-groups of the CCSP to obtain the views of professionals and stakeholders. This report was also considered by

Scrutiny Co-ordination Committee on the 18th December 2024. Following this, a survey was issued to Elected Members to enable them to input to the Plan. Consideration has also been given to the West Midlands Police Crime Commissioner's Priorities outlined in his 2025-2028 Plan.

The Plan is being presented to Cabinet and Council. If approval is given, the Plan will commence from the 1st April 2025.

Recommendations:

Cabinet is recommended to:

- (1) Consider the requirements of the Crime and Disorder Act 1998 and recommend that Council approve the proposed Coventry Community Safety Partnership Plan.
- (2) Request quarterly monitoring of the Plan by the Coventry Community Safety Partnership.
- (3) Request a yearly report to update on the progress of the Coventry Community Safety Partnership Plan.

Council is recommended to:

- (1) Consider the requirements of the Crime and Disorder Act 1999 and approve the proposed Coventry Community Safety Partnership Plan.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 - West Midlands Police Commissioners Priorities
Appendix 2 - Engagement and Consultation Plan
Appendix 3 - Results of the Public Consultation
Appendix 4 - Results of Partners Workshops
Appendix 5 - Results of the Member Consultation
Appendix 6 – Coventry Community Safety Partnership Plan
Appendix 7 - Plan on a Page
Appendix 8 - Equality Impact Assessment

Background papers:

9th July 2024 – Cabinet Meeting – Proposed Consultation for the Community Safety Partnership Plan.

18th December 2024 – Scrutiny Co-ordination Committee – Community Safety Partnership Plan.

Other useful documents

Crime and Disorder Act 1998

Has it or will it be considered by Scrutiny?

Yes – 18 December, 2024

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- 25 March, 2025

Report title: Community Safety Partnership Plan 2025-2028

1. Context (or background)

- 1.1. Under Section 5 of the Crime and Disorder Act 1998, the Council along with the Police have a joint responsibility for preventing and reducing crime and disorder within their area. They are “Responsible Authorities” and have a duty to cooperate through the “Community Safety Partnership”. In Coventry, this duty is actioned through the Coventry Community Safety Partnership (CCSP)
- 1.2. CCSP is required to develop an overarching Community Safety Partnership Plan under the Crime and Disorder Act 1998. The Plan provides an overview of the work and priority areas that fall under the responsibility of the CCSP. The Plan is intended to focus upon those issues of most concern to residents, that cause the most harm to communities and require a coordinated approach to deliver lasting change.
- 1.3. The Plan will be informed by :
 - the views of residents, including those who have been affected by crime and/or accessing services;
 - information from the Strategic Assessment which analyses crime and safety issues in the community;
 - evidence of “what works” in tackling crime and disorder; and
 - the views of professionals and stakeholders working locally.
- 1.4. On the 9th July 2024, Cabinet considered the requirements of the Crime and Disorder Act 1998 and the need to create a Community Safety Partnership Plan. They also authorised a 12-week public consultation beginning on 10th July 2024 to 2nd October 2024.
- 1.5. In addition to the public consultation workshops were held by the sub-groups of the CCSP to obtain the views of the professionals and stakeholders.
- 1.6. CCSP collaborates with the West Midlands Police and Crime Commissioner. The Commissioner is finalising the Police Crime Commissioner Plan. These priorities have been considered in the consultation and a summary of these priorities can be found in Appendix 1 of the report.

2. Options considered and recommended proposal

- 2.1. There are two options to consider:
 - a) Take no action.
 - b) Endorse the Coventry Community Safety Partnership Plan 2025-2028.
- 2.2. The preferred option is b) and the main reasons for supporting this are as follows:

- The Plan will ensure legal compliance with the Crime and Disorder Act 1998.
- The Plan will give an accountable and coordinated response to enable the City Council and its partners to reduce crime and disorder within the city.
- The Coventry Community Safety Partnership will monitor the Plan on a quarterly basis, ensuring that partners are held accountable for reducing crime and disorder in Coventry.

3. Results of Public Consultation

- 3.1. A 12-week public consultation was conducted from 10th July 2024 to 2nd October 2024. The survey was distributed to residential groups, community partners faith forums and promoted through family hubs and community events. Appendix 2 of the report provides a summary of the engagement Plan.
- 3.2. A total of 696 responses were received from the public consultation. The results of the survey are presented in Appendix 3 of the report. The results of the survey have been used to form the Coventry Community Safety Partnership Plan.

4. Partnership Consultation

- 4.1. Workshops were undertaken with stakeholders and partners. As part of the workshops partners reviewed the findings of the Strategic Assessment and gave their professional perspective on what considerations should be made in the Coventry Community Safety Partnership Plan.
- 4.2. The workshops focused on Place, Victim and Offender themes. Appendix 4 of the report summarises the results, which have been considered in creating the Coventry Community Safety Partnership Plan.

5. Member Consultation

- 5.1. A progress report was submitted to the Scrutiny Committee on the 18th of December 2024. The Committee noted the report and supported the recommendations. Following this meeting, a survey was sent to all Elected Members to provide them with an opportunity to contribute to the plan. The results of the survey are presented in Appendix 5. These results have been considered when creating the Community Safety Partnership Plan.

6. The Coventry Community Safety Partnership Plan

- 6.1. The Coventry Community Safety Partnership Plan has been provided in Appendix 6 and has been summarised in a “plan on the page” format which is available in Appendix 7. The Plan takes on three key themes:
 - The reduction of offending, preventing re-offending and serious violence.

- Public place safety and reassurance.
- Tackling exploitation and protecting victims of crime.

The priorities are grounded in a problem-oriented policing model, focusing on victim, location and offender. Each priority is closely connected, with all three influencing and supporting one another to ensure a comprehensive and effective approach to community safety.

7. Timetable for implementing this decision

- 7.1. The Coventry Community Safety Partnership Plan forms part of the Policy Framework and therefore needs Council Approval. If approved by Cabinet the Plan will be reviewed by Council on the 25th March 2025.
- 7.2. If approved by Cabinet and Council, the Plan will be instigated on the 1st April 2025.

8. Comments from the Director of Finance and Resources and the Director of Law and Governance.

8.1. Financial Implications

- 8.2. To support its duty to reduce crime and disorder, the CCSP receives funding on an annual basis from the Home Office. The CCSP has received £153K for 2025/26. This fund will align with the priorities of the Community Safety Plan.

8.3. Legal Implications

Under Section 5 of the Crime and Disorder Act 1998, the Council along with the Police have a joint responsibility for preventing and reducing crime and disorder within their area. They are “Responsible Authorities” and have a duty to cooperate through a Community Safety Partnership.

Community Safety Partnerships also have a legal duty to formulate a strategy for the reduction of crime and disorder in the area. This strategy is known as the Partnership Plan. Before formulating a strategy the Responsible Authorities are required to carry out a review of levels and partners of crime and disorder. This review is known as the Strategic Assessment.

9. Other implications

9.1. How will this contribute to the 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 primary driver for all the work carried out by the CCSP is to coordinate city and partner resources to prevent and reduce crime and ASB.

The CCSP work together to:

- Prevent offending
- Managing and changing the behaviour of offenders
- Reduce crime, the fear of crime and ASB
- Reduce the harm of illegal drugs and alcohol and support safer socialising
- Minimising the risk of harm to vulnerable people
- Supporting victims
- Protecting communities
- Protecting locations from crime and making public spaces safer.

The Coventry Community Safety Partnership Plan will support the following priorities of the Regulatory Services Operational Plan.

Priority 8 - Prevent and reduce crime, disorder, ASB and environmental issues that affect the quality of life in the city.

Priority 9 - Tackling violence and abuse in all forms, including sexual assault and abuse, serious violence and domestic abuse.

How is risk being managed?

In accordance with the Crime and Disorder Act 1998, the Council is obligated to collaborate with partners to decrease crime and ASB within their jurisdiction. This plan will also ensure a coordinated approach to addressing crime and ASB, with oversight provided by the Coventry Community Safety Partnership.

9.2. What is the impact on the organisation?

The approval of the Plan will have a limited impact on the organisation. There is no human resource, financial or ICT implication as the Plan will be carried out using current resources.

9.3. Equalities / EIA?

The report makes links to the Council's Equalities and Diversity Policies. The data from the Strategic Assessment will be used to inform the Equality Impact. An Equality Impact Assessment has been completed and is attached at Appendix 8 of the report.

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

The CCSP tackle place-based issues. The consultation will obtain the views on place-based ASB and the Coventry Community Safety Partnership Plan will support improving this objective.

9.5. Implications for partner organisations?

CSP comprises a diverse group of partners, including West Midlands Police, West Midlands Fire Service, Coventry and Warwickshire Integrated Care Board, local registered social landlords and Coventry Probation Services. The Community Safety Partnership Plan will require them to work collaboratively with Coventry City Council to help reduce crime and disorder in the city.

Report author(s):

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Enquiries should be directed to the above person

Contributor/approver name	Title	Service Area	Date doc sent out	Date response received or approved
Contributors:				
Davina Blackburn	Strategic Lead - Regulation & Communities	Regulatory Services, Law and Governance.	14/02/25	18/02/25
Adrian Chowns	Head of Safer Housing and Communities	Regulatory Services, Law and Governance.	14/02/25	18/02/25
Suzanne Bennett	Governance Services Co-ordinator	Law and Governance	14/02/25	14/02/25
Names of approvers for submission: (officers and members)				
Finance: Richard Shirley	Lead Accountant	Finance	14/02/25	14/02/2025

Legal: Amy Wright	Solicitor	Law and Governance	14/02/25	18/02/2025
Director: Julie Newman	Director of Law and Governance	Law and Governance	14/02/25	20/02/2025
Members: A Khan	Cabinet Member for Policing and Equalities	Law and Governance	20/02/25	24/02/2025

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west midlands
police and crime
commissioner

My Priorities...

REBUILD COMMUNITY POLICING

- Make neighbourhoods safer
- More officers visible in communities
- Solve local problems with communities
- Work with local businesses
- Combat anti-social behaviour
- Tackle hate crime

TACKLE VIOLENCE

- Violence Against Women and Girls
- Domestic Abuse, including children
- Serious Youth Violence and knife crime
- Organised Crime Gangs and guns
- County lines and criminal exploitation
- Violence against retail workers

IMPROVE ROAD SAFETY

- Increase prevention and enforcement against speeding, phone use, drink/drug driving and failure to wear a seatbelt (the fatal 4)
- Increase 3rd party reporting
- Tackle organised street racing
- Clamp down on uninsured vehicles

REDUCE NEIGHBOURHOOD CRIME

- House burglary
- Street robbery
- Car theft and theft from vehicles
- Fraud
- Online crimes

PROTECT VICTIMS AND WITNESSES

- Victim's Rights and Welfare
- Access to justice
- High quality support services for victims
- Support 'by and for' specialist services
- Amplify the voice of victims

MAKE WEST MIDLANDS POLICE EXCELLENT

- Fair funding and efficient use of resources
- High quality, well trained, well supported and representative workforce
- High performing, trusted Force
- Effective and ethical use of data/new technology
- Decarbonisation: Net Zero

My Principles...

BRINGING OFFENDERS TO JUSTICE

- Crimes accurately recorded
- Efficient and effective investigations
- More crimes detected and positive outcomes
- Greater use of Out of Court Disposals and Civil Orders
- Efficient and effective criminal justice system

PREVENTION & REHABILITATION

- Protecting the vulnerable
- Children and young people focus
- Reduce harm from illegal drugs
- Support and challenge people to turn their lives around

PARTNERSHIPS

- Bring WM partners together to make a real difference
- Work with government to deliver change
- Effective local, regional and national collaboration

BUILDING TRUST AND CONFIDENCE

- Fairness and belonging
- Best policing for people and in places that need it most
- Listening and responding to the public
- Understanding and addressing disproportionality
- Learning from our history

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Coventry Community Safety Partnership

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 residents, and all other stakeholders in relation to the creation of a 3-year Community Safety Partnership Plan to direct the delivery of its priorities.

Community Safety Partnerships (CSPs) are the statutory body that bring together local partners to solve shared issues around Crime and Disorder, Anti-Social Behaviour (ASB), Drug and alcohol misuse, and reoffending. The CSP in Coventry meets as the Police and Crime Board (PCB).

Every three years Community Safety Partnerships are required to develop an overarching Community Safety Partnership Plan under the Crime and Disorder Act 1998. The plan provides an overview of the work and priority areas that fall under the responsibility of the CSP.

In advance of the plan, the CSP will be using information from the Strategic Assessment. The Strategic Assessment is created on behalf of the CSP, by West Midlands Police Partnership Intelligence Liaison Team. It provides an analysis of the level and patterns of crime and disorder in the city over the last 12 months.

The information from the public consultation and stakeholders, together with the data from the Strategic Assessment will be reviewed in workshops by the sub-groups of the PCB. This will be used to generate the strategic priorities of the PCB and a Community Safety Partnership Plan will identify how these priorities will be delivered.

1.2 What do we want to achieve?

The main purpose of this activity is to help the Community Safety Partnerships to consult with the public as required by the Crime and Disorder Act 1998, which will allow them to develop and carry out strategies that reduce crime and disorder, address substance misuse, and decrease reoffending in their local authority area.

The objectives of the activity are:

- To collect and summarise the views and opinions of the residents in Coventry about ASB & crime & disorder.
- To record any feedback from key partners and stakeholders in the city and any challenges they may face in achieving their aims

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 ASB and crime & disorder. Following this wide reaching consultation the Council will analyse the responses and develop a report to demonstrate how it has responded to the suggestions received. The results of the consultation will help to inform the production of a 3-year Community Safety Plan. 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 length of time the plan will be in operation.

Can be influenced by the public:

- Priorities
- How we deliver on the priorities
- How we can support their issues

3. Engagement and Consultation Plan

3.1 Who are we engaging with?

The following list are examples of the stakeholders that the Council will consult with and is not limited.

General target group	Examples of Individuals/organisations
Organisations that represent residents' in the city	<ul style="list-style-type: none"> • 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 • 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 • Wood End Residents and Friends (WERAF) • Wood End, Henley Green and Manor Farm (WEHM) • Frontline Network
Universities/colleges	<ul style="list-style-type: none"> • Coventry University • Warwick University • Arden University • Coventry Students' Union • Warwick Students' Union • City College

	<ul style="list-style-type: none"> • Herewood College
Youth Groups	<ul style="list-style-type: none"> • Guiding Young Minds • Positive Youth Foundation • Sky Blues in the Community • Bardsley Youth Project
Charities	<ul style="list-style-type: none"> • CW Mind • Shelter • Crisis • Citizens Advice • City YMCA • Cyrenians • Steps For Change • Emmaus • Valley House • Haven • Grapevine
Local Business	<ul style="list-style-type: none"> • BiD (Business Improvement District) • Federation of business owners
Other	<ul style="list-style-type: none"> • Coventry Pride • DEN (Internal) • Local Councillor's • Coventry Multi-Faith Forum
Advice groups	<ul style="list-style-type: none"> • Citizens Advice Bureau • Coventry Independent Advice Service • Age UK Coventry and Warwickshire • Coventry Refugee and Migrant Centre
Emergency Services	<ul style="list-style-type: none"> • West Midlands Police • West Midlands Fire and Rescue Service

3.2 When and how are we engaging?

This consultation will last for 12 weeks, starting on 10th July 2024 and ending on 2nd October 2024. The consultation period has been set to allow us to reach out to a broad variety of stakeholders. To facilitate this, we have planned several different engagement activities for the consultation, including:-

Online consultation questionnaire

The main way for people to share their opinions and thoughts on the plan will be through a consultation page on the Council's online platform "Let's Talk". It will have an online survey. This will help us to collect, compare and track responses.

The page on the Council's website will give the respondent all the information they need about the proposal so they can provide relevant information. They can use the online survey on any device - mobile, tablet, laptop/computer. Residents who don't have digital access can ask for a paper copy or get help to do the survey digitally at one of our engagement sessions.

Meetings/workshops/forums/engagement sessions

We will organise several events to engage stakeholders as part of the consultation. We will visit various forums to inform them about the consultation and respond to their enquiries. We will invite attendees to participate in our consultation workshops and/or complete our online consultation survey on the tablets that we will provide at the sessions.

To hear from residents in different locations, we will hold sessions throughout the city. We will also reach out to support networks and local groups so that different residents can share their views on our proposals and their local crime and anti-social issues.

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 sample questions shown here are taken from our planned online consultation survey and are not meant to cover everything. There will be a comprehensive pack with all the relevant information to help respondents comprehend what they are being asked and provide a thoughtful response.

1. Have you or anyone you know been a victim of ASB or crime in the last 12 months
2. Do you go into Coventry town centre on a regular basis during the day
3. Do you go into Coventry town centre on a regular basis at night/evening
4. What do you think are the biggest crime and Anti-Social behaviour issues in your

neighbourhood.

5. From the list below which three options do you think should be the main priorities for Coventry's Community Safety partnership to focus on.
6. Do you have any additional thoughts on the priorities for the Coventry Community Safety Partnership, or about community safety issues in general?
7. From the list below please select the five most effective ways that you think crime could be reduced in your neighbourhood and the city.
8. From the list below select 3 ways you think Coventry's Community safety partnership could help local communities respond to ASB and crime in your area
9. From the list below select all the ways you currently get news and updates from Coventry City Council

3.4 How will we promote the engagement opportunity?

The Council will communicate effectively to encourage feedback from the consultation and ensure that it reflects the opinions of the impacted groups. The main goal of the consultation is to inform and educate stakeholders about the proposals and how they can share their views. Communications will continue during the consultation and will involve:

- Advertising on electronic media such as Coventry City Council website
- An e-form 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
- Direct mail and email to local communities
- Community meetings and events in Coventry including focus groups for the representatives of some minority groups
- Emails to local stakeholders
- A dedicated email address for responses
- PowerPoint presentations for events.
- Direct emailing of Resident Associations.
- Invitation of various stakeholders to online workshops
- Presentations at online forums
- Advertised internally on staff intranet

3.5 What is our plan for letting people know the outcome of the consultation?

The consultation process will involve keeping a formal record of each event or period of consultation and the feedback received. The record will include the date of the consultation, the type of consultation, the participants and the feedback provided. After the consultation is finished and all responses are collected, all feedback will be evaluated and presented in the consultation report.

Coventry City Council will document all comments received and explain how they made decisions and weighed consultation responses with any evidence and information. They will put the consultation report on the website. The consultation results and response, and any recommendations, will go to the Council's Cabinet.

4. Activity plan

WHAT	WHO	PURPOSE	WHERE	WHEN
Attend Community Council Meetings		Introduce the plan to hold a consultation and ask for volunteers to attend our consultation workshops.	Online/in person	TBC
Strap lines on emails	General public	Advertise consultation.	Community Safety Officers and management	Duration of consultation
Social media campaign	General public	Advertise consultation.	Facebook. Twitter, Instagram, Yammer	Once a week for the duration of consultation
Advertising on electronic media	General public	Advertise consultation.	Coventry City Council website & Let's Talk pages	Duration of consultation
Email/Mail shot to stakeholders	Mailing list	Advertise consultation.	PCB members & Stakeholders	July
Email invitations	Mailing list	Invite Groups and agents to our discussion workshops on our plan	Email	July
Electronic Flyers	General public	Advertise consultation.	Information in all CCC E Newsletters	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:

Community Safety
 Address: PO Box 15
 Council House
 Earl Street
 Coventry
 CV1 5RR
 Telephone: 02475 270947
 Email: Communitysafety@coventry.gov.uk

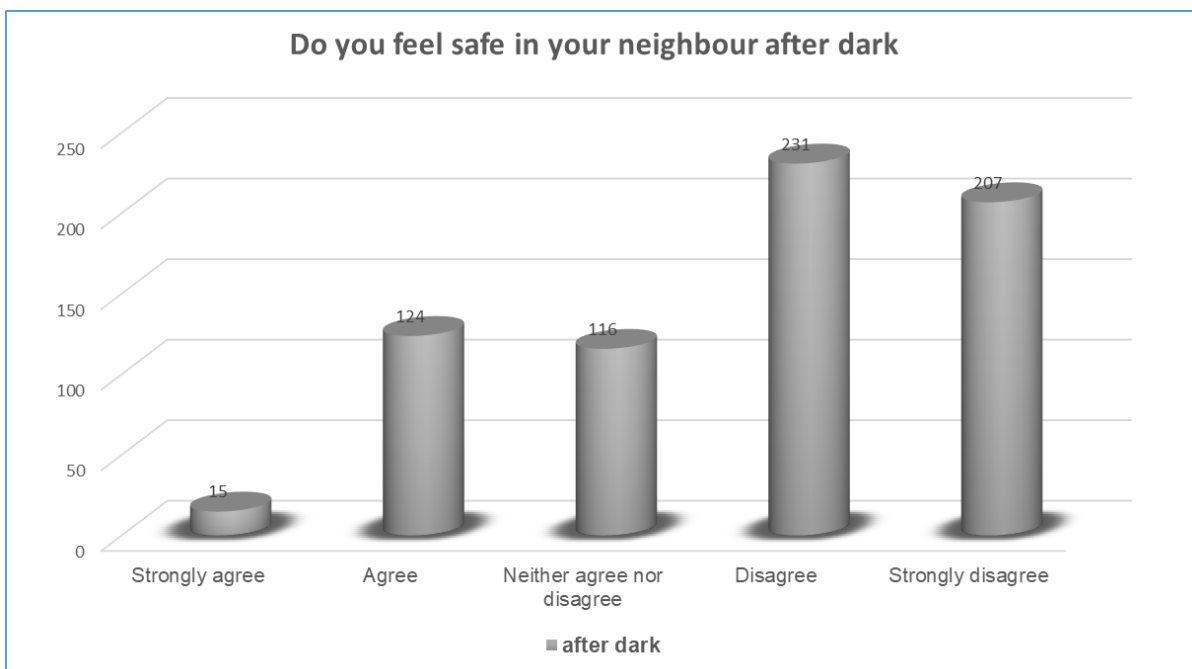
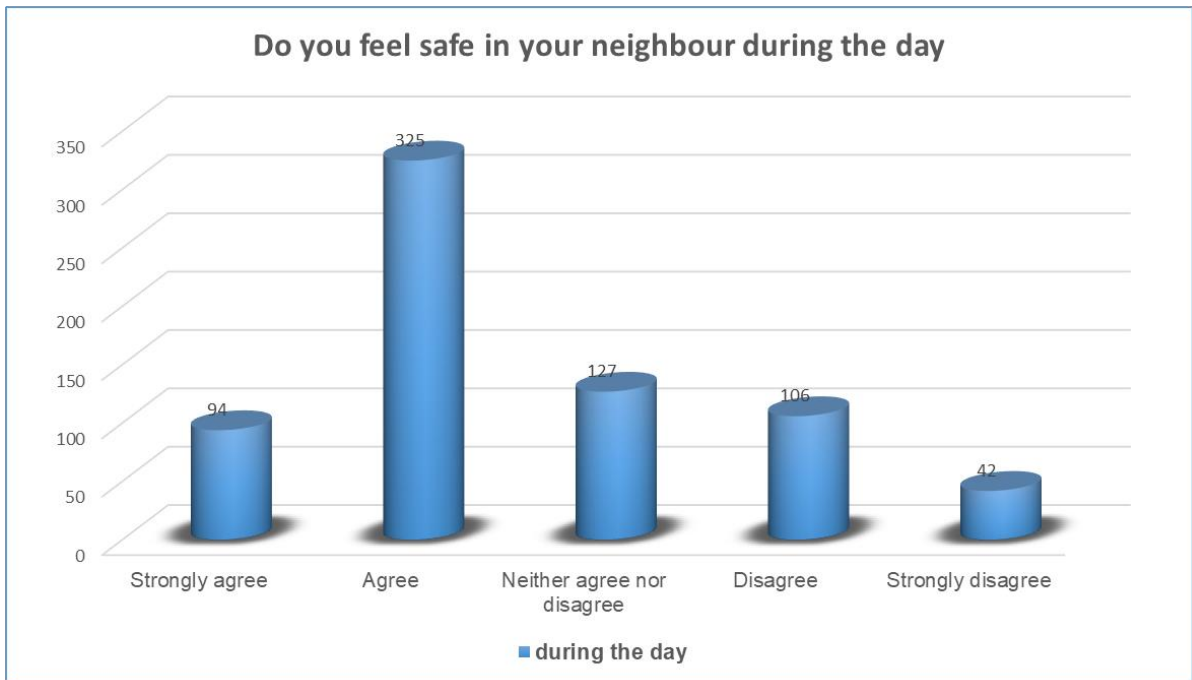
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Appendix 3 - Results of Community Safety Partnership Consultation

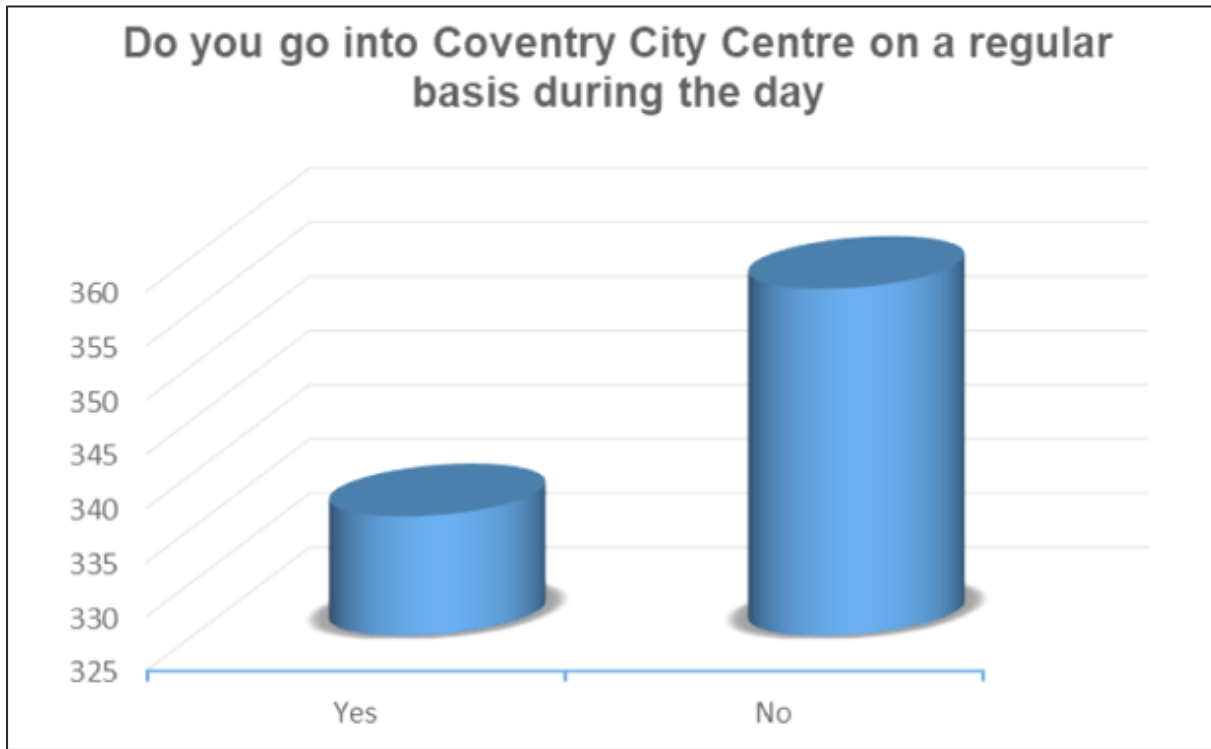
A 12-week consultation was undertaken to obtain residents' views of crime in the city. A total of 696 responses were received.

Fear of Crime

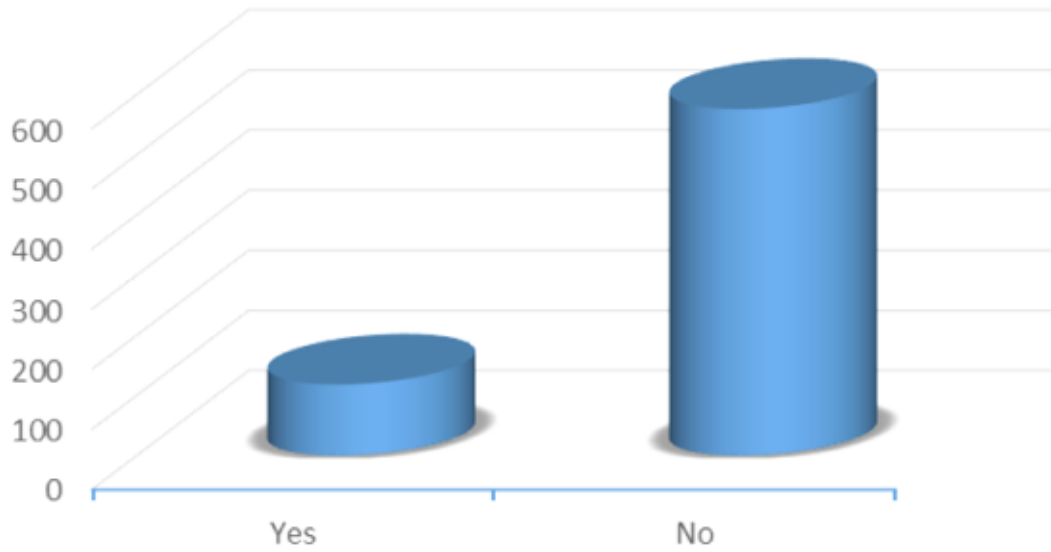
In summary, residents generally felt safer during the daytime than at night in Coventry. Over 60% agreed or strongly agreed that they felt safe during the day. However, 63% disagreed or strongly disagreed when asked if they felt safe at night.



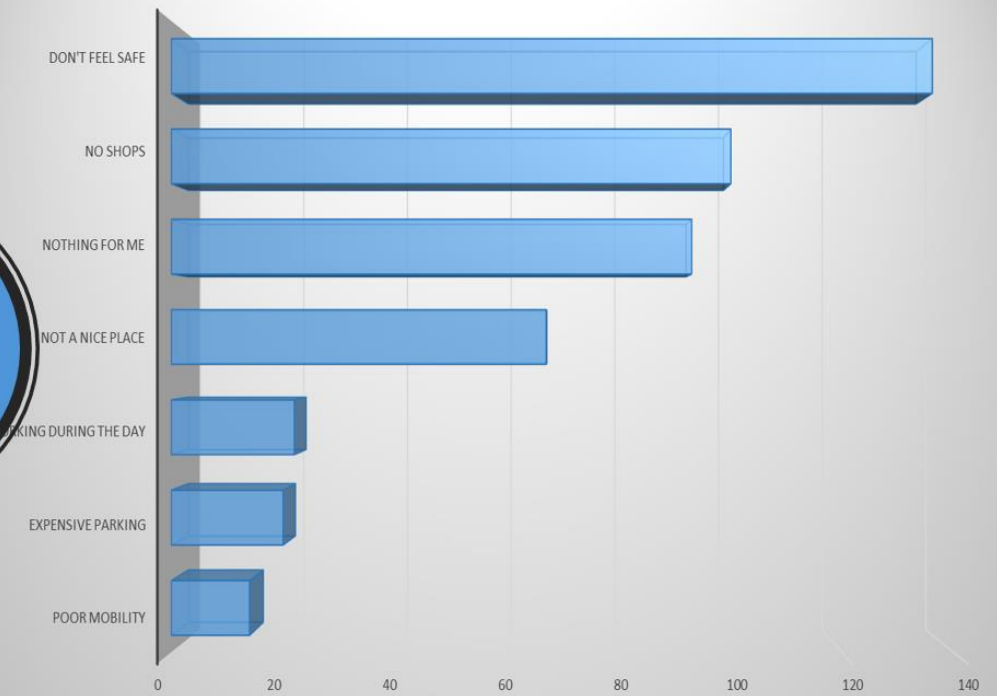
The survey also asked if residents visited the city centre during the daytime or at night. More people visited the city centre during the day (48.5%) than at night (83%). The reasons for not visiting varied; from a community safety perspective, the results indicated that residents did not feel safe. This sentiment was even more evident during the evening as many respondents stated that their reason for not visiting was due to safety concerns.



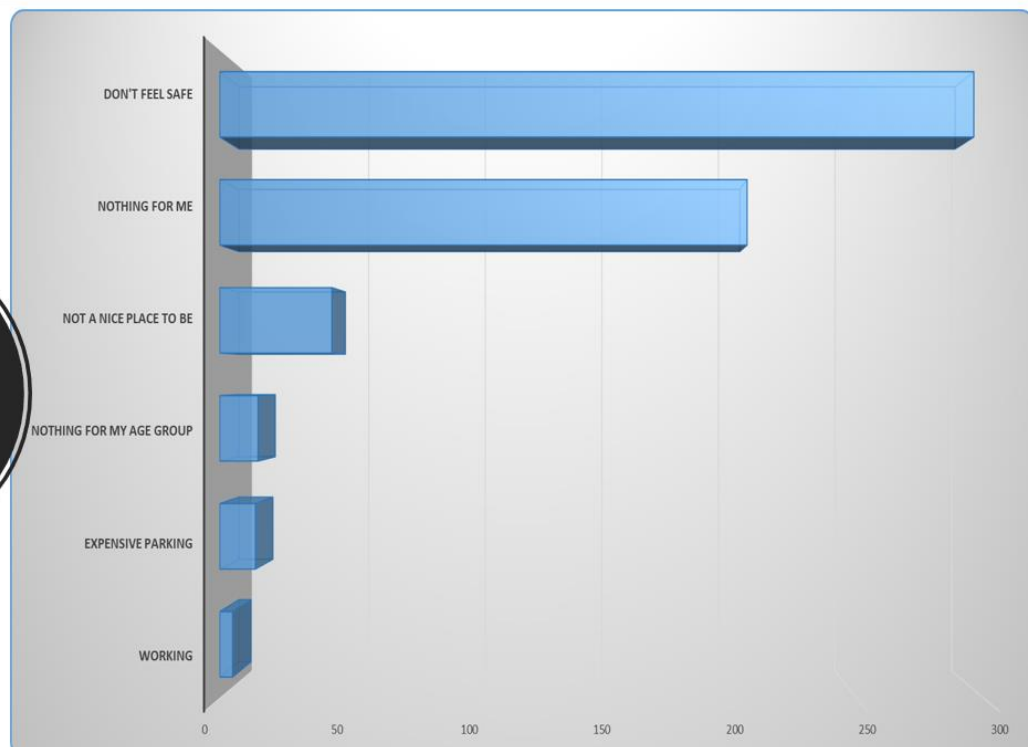
Do you go into Coventry City Centre on a regular basis at night



Why people don't go into town during the day



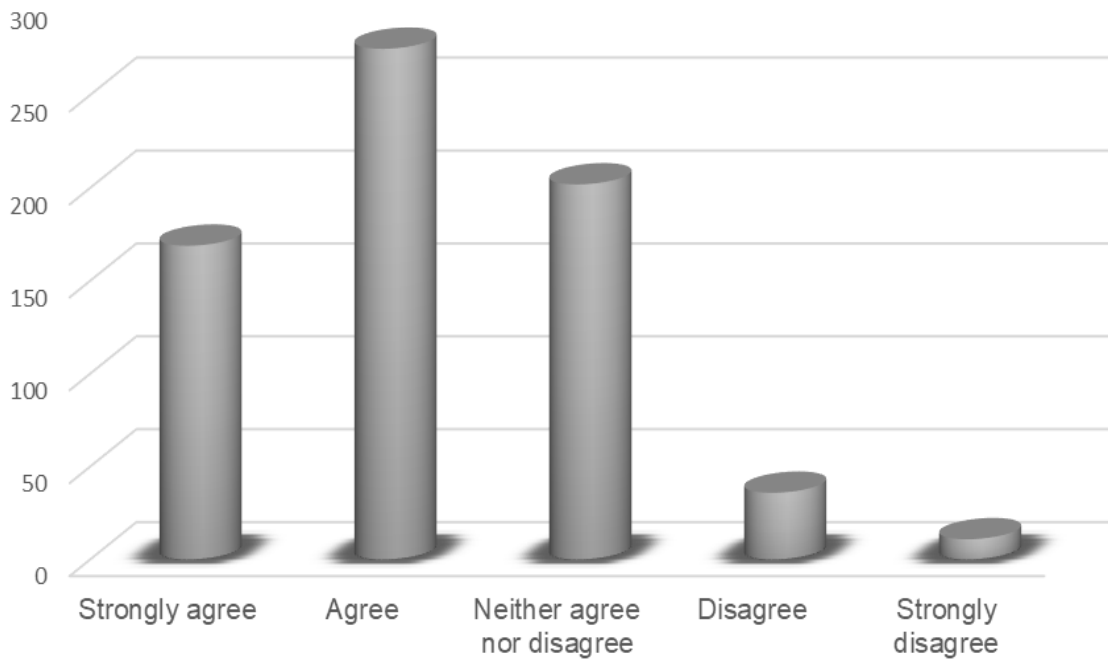
Why people
don't go into
town at
night



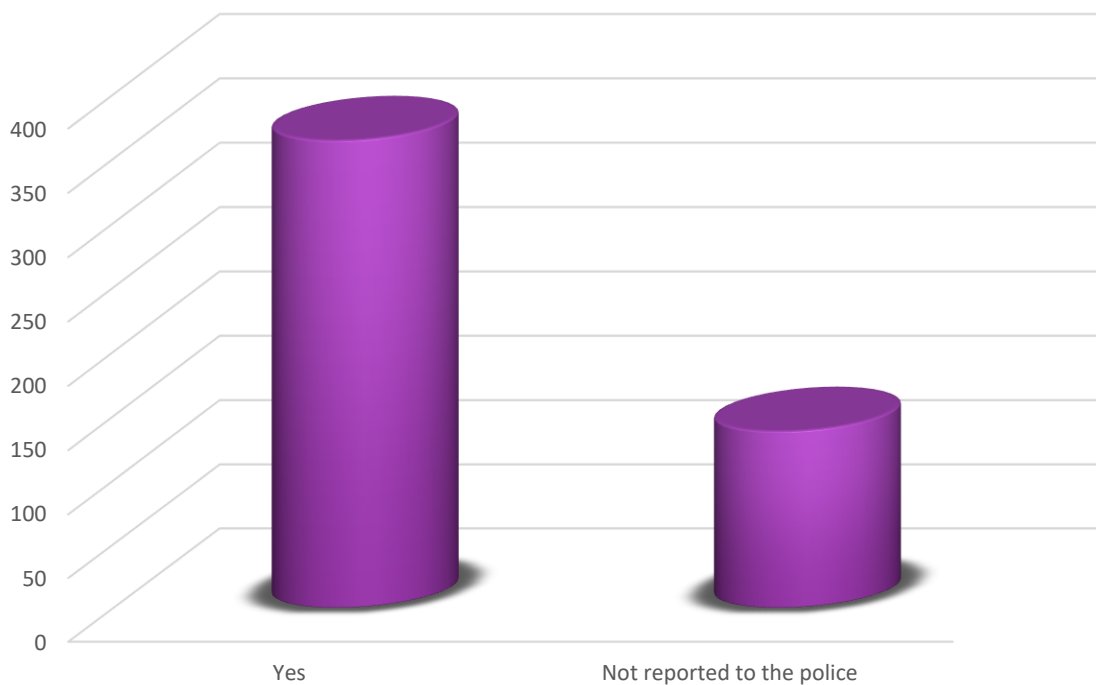
Anti-Social Behaviour and Crime.

Residents felt that Anti-Social Behaviour (ASB) had increased over the last 12 months, with 64% agreeing that been an increase. Over 43.6% had been or knew a victim of crime or ASB. Of those responding "yes," 27.5% had not reported the issues to the police. When asked why not, 58.9% felt no action would be taken if it was reported, while others felt the issue wasn't significant enough to report.

Over the last twelve months levels of Anti-Social Behaviour have increased.

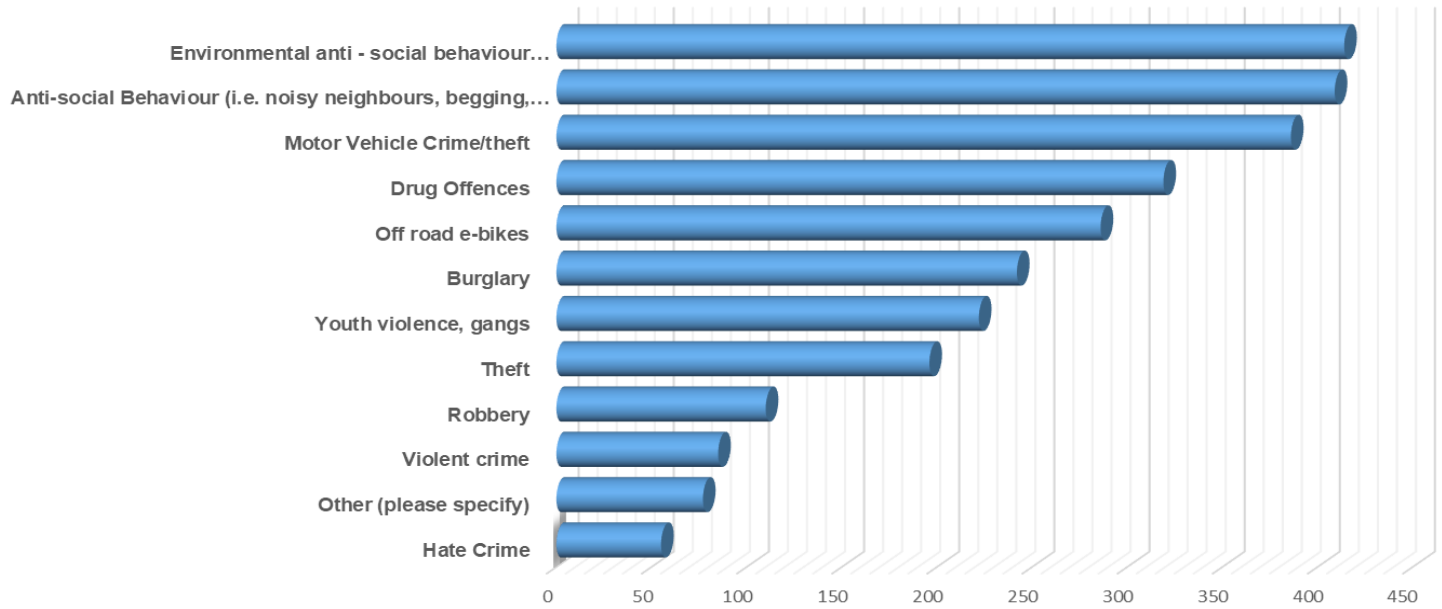


Victim of anti-social behaviour or crime but not reported to the police



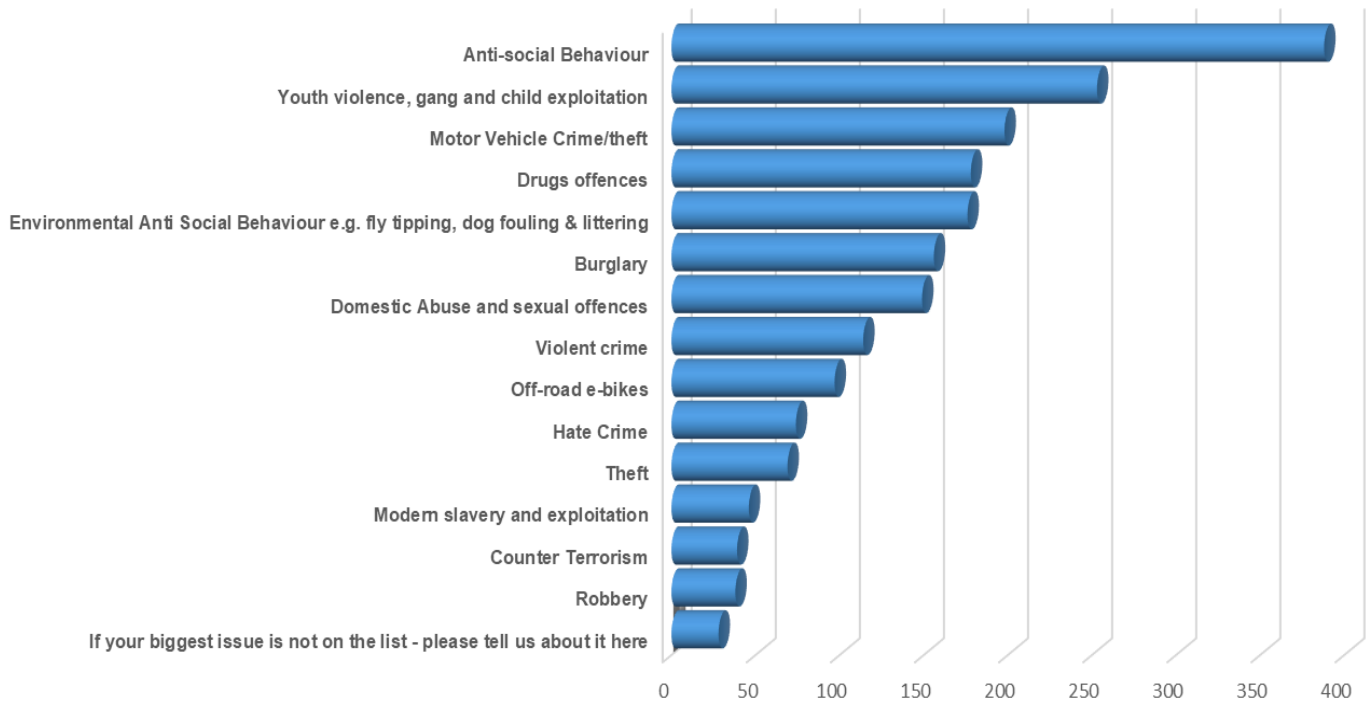
(fly-tipping, dog fouling, littering), General ASB (noisy neighbours, begging, minor damage) and Motor Vehicle Crime.

What do you think are the biggest crime and Anti-Social behaviour issues in your neighbourhood?



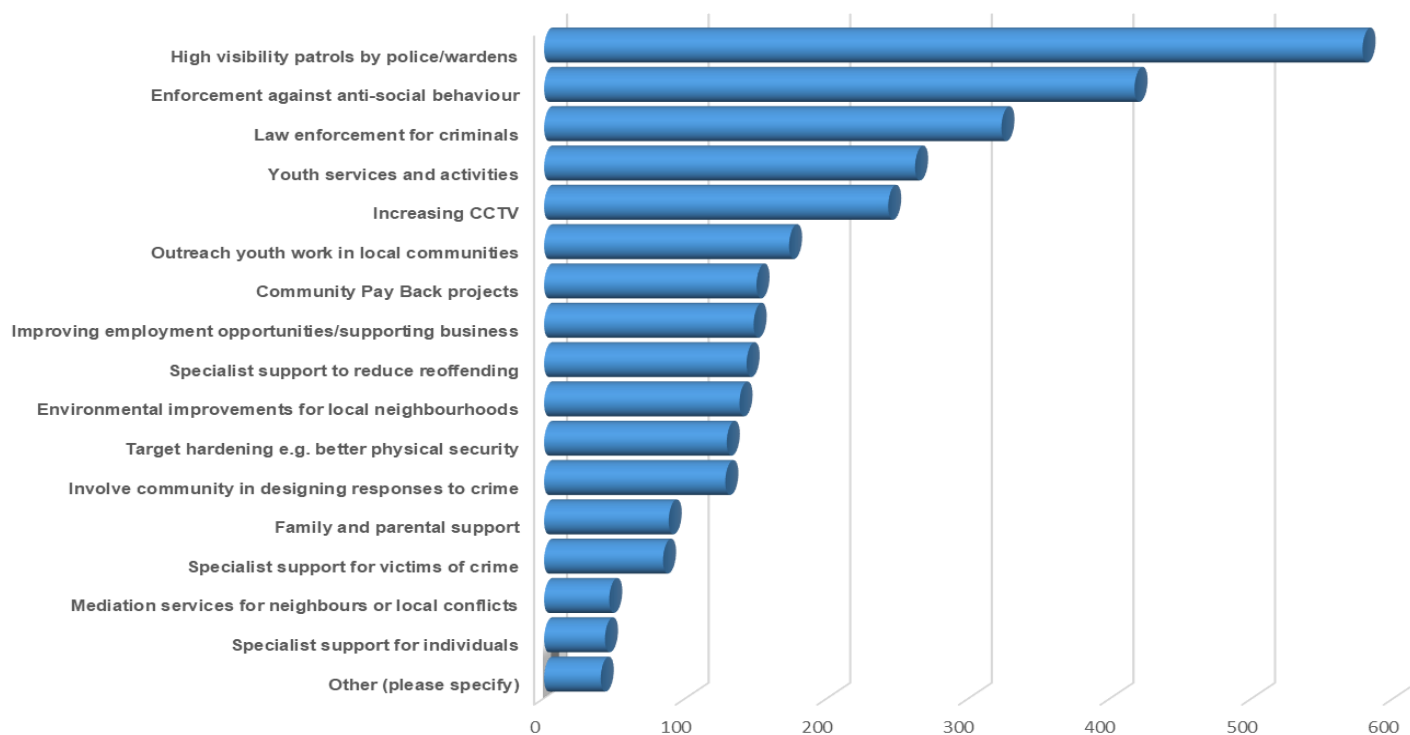
When asked about the Coventry Community Safety Partnership (CCSP) main priorities. The Top three priorities were ASB, Youth Violence, Gangs and Child Exploitation and Motor Vehicle Crime.

What do you think should be the main priorities for Coventry's Community Safety partnership to focus on



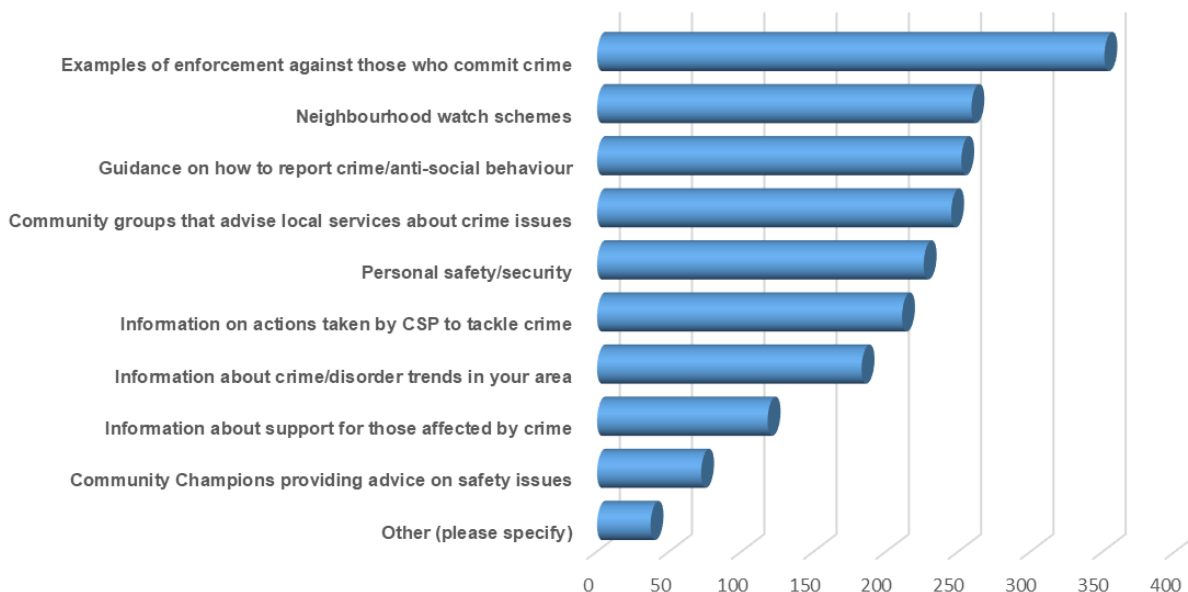
Residents suggested that the CCSP, we should prioritise high visibility patrols, enforce against ASB and law enforcement for criminals. They also recommended more youth services, and activities and increased CCTV.

What are the most effective ways that you think crime could be reduced in your neighbourhood and the city.



Residents believed they could help the community respond to crime by showcasing enforcement examples, supporting Neighbourhood Watch Schemes, and providing guidance on reporting crime and ASB. They also suggested the CCSP offer more information on local services related to crime and advice on personal safety and security.

How do you think Coventry’s Community safety partnership could help local communities respond to ASB and crime in your area



Demographics

	16 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65+	Prefer not to say	Grand Total
Female	6	35	69	84	99	76	10	379
In another way	1	1			1			3
Male	5	42	45	51	59	74	5	281
Prefer not to say		2	1	1	2	2	19	27
(blank)								
Grand Total	12	80	115	136	161	152	34	690

How would you describe your ethnic background? (please select one)		
White British	512	74.5%
White Irish	11	1.6%
White Gypsy or Irish Traveller	1	0.1%
Other White Background	37	5.4%
Mixed White and Black Caribbean	6	0.9%
Mixed White and Black African	1	0.1%
Mixed White and Asian	1	0.1%
Other Mixed or Multiple Ethnic Background	2	0.3%
Asian or Asian British Indian	37	5.4%
Asian or Asian British Pakistani	9	1.3%
Asian or Asian British Bangladeshi	3	0.4%
Asian or Asian British Chinese	7	1.0%
Other Asian Background	3	0.4%
Black or Black British African	3	0.4%
Black or Black British Caribbean	5	0.7%
Other/Black/African/Caribbean background	1	0.1%
Prefer not to say	41	6.0%
Other (please specify)	7	1.0%

687

Do you consider yourself to be?	
---------------------------------	--

Budhist	2
Christian	297
Hindu	9
Jewish	1
Muslim	16
Sikh	18
No Religion	195
Atheist	61
Prefer not to say	69
Other (please specify)	17

Is the gender you identify with the same as your sex registered at birth?		
Yes	659	95.4%
No	4	0.6%
Prefer not to say	28	4.1%

691

What is your sexual orientation?	
Bisexual	24
Gay	19
Heterosexual	537
Lesbian	6
Prefer not to state	93
Other (please specify)	5
	684

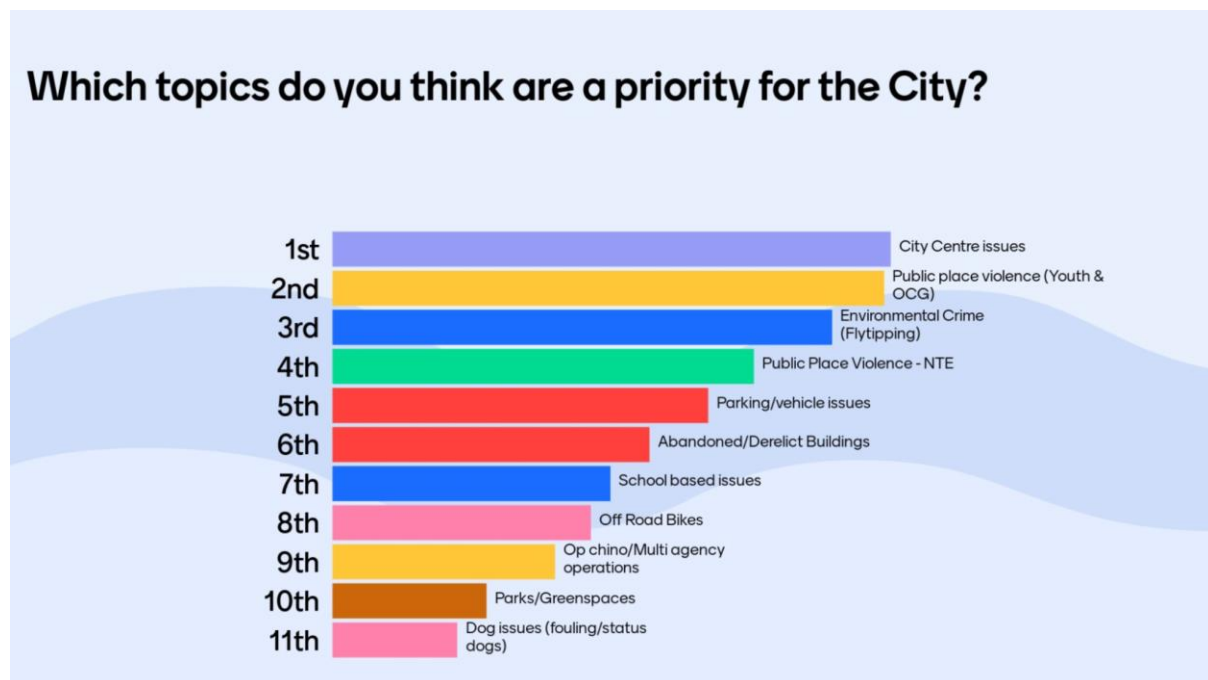
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Appendix 4 - Results of Partnership Consultation.

Partnership workshops were conducted as part of our consultation process. As part of the workshop partners reviewed data from the strategic assessment and asked questions on their professional opinion on how the Coventry Community Safety Partnership Plan could be developed.

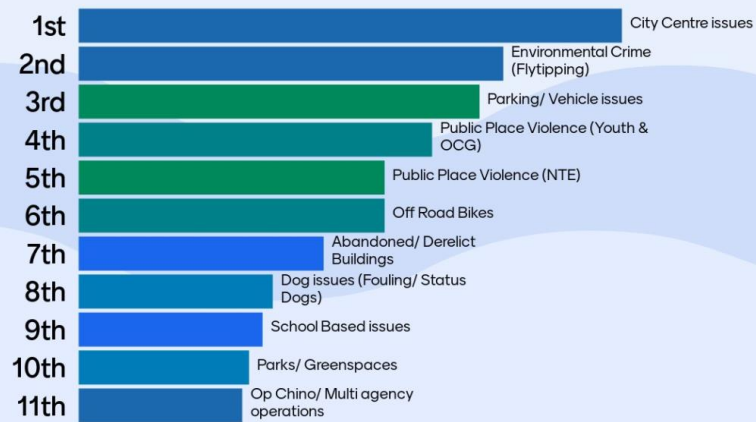
Place-based themed Partnership Workshop

The five priorities in the place-based workshop were city centre issues, public place violence (Youth and Organised Crime Group), Environmental Crime, Public Place Violence (Night Time Economy (NTE)) and Parking/Vehicle issues.



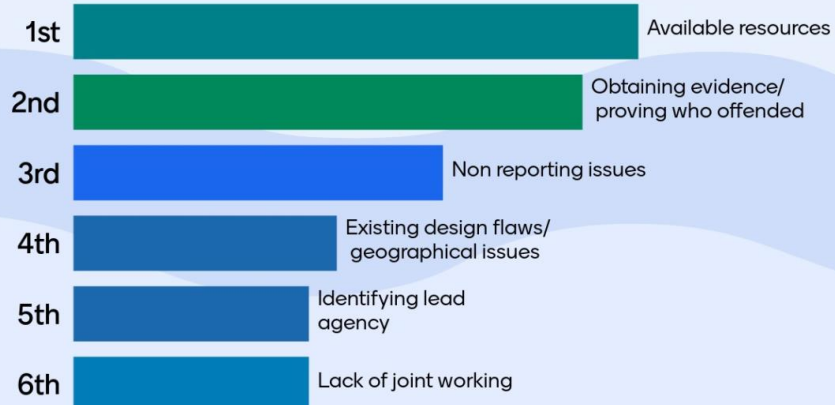
Partners felt that the areas which required more development were centre city issues, Environmental Crime and Parking and Public Place Violence.

Which topics require more development?



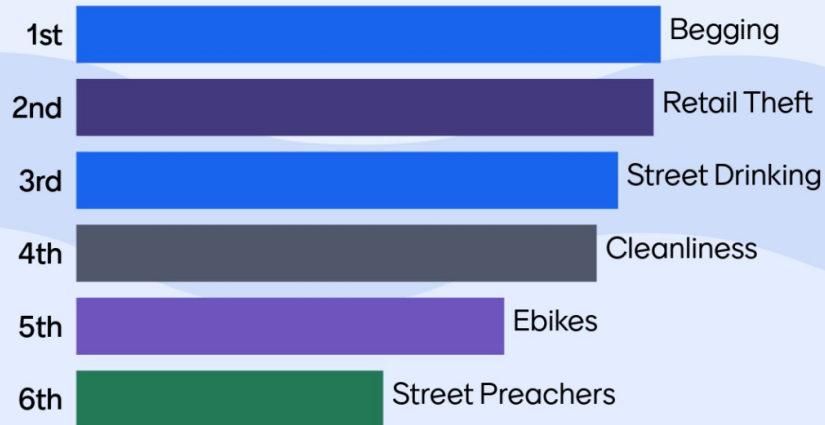
The group felt the biggest challenges for location-based issues were the availability of resources, obtaining evidence on offenders and reporting issues.

What are the Biggest challenges for location issues?



When asked specifically about the city centre, partners felt begging, retail theft and street drinking were the biggest issues.

What are the main City Centre issues?



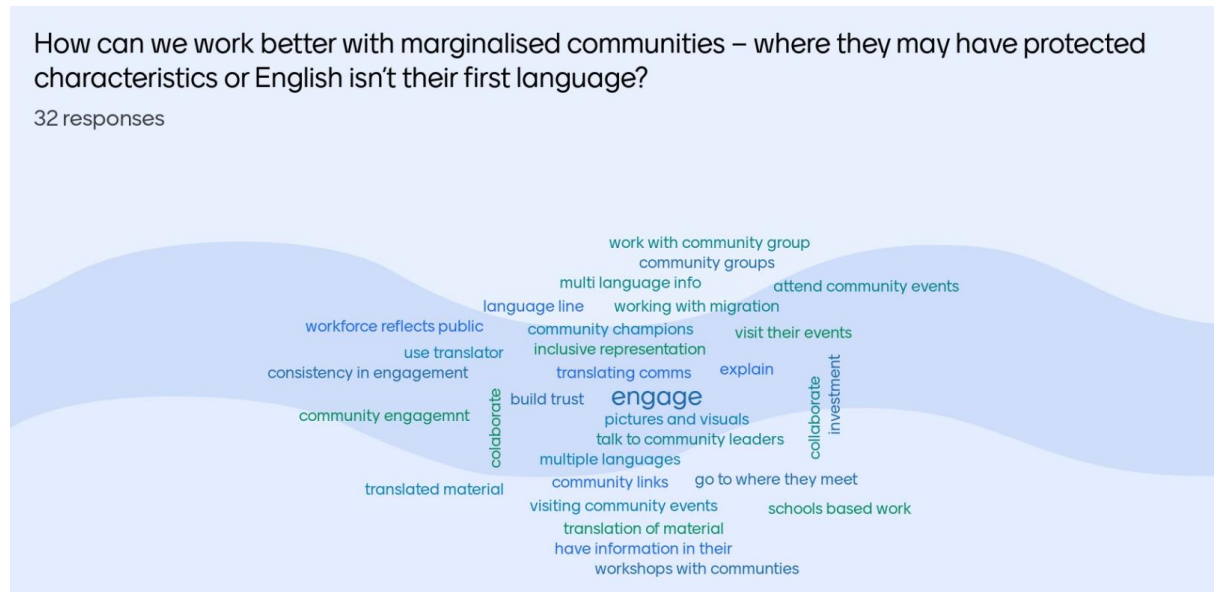
Partners acknowledged collaborative efforts to address location-based issues but saw room for improvement. They disagreed about resource availability being adequate. They believed the partial street lighting switch-offs were linked to fear of crime, not actual crime increases. There was a general consensus on the need for more CCTV and neutrality on resource views in impact areas.

In your Opinion, do you Agree or disagree with the statements below



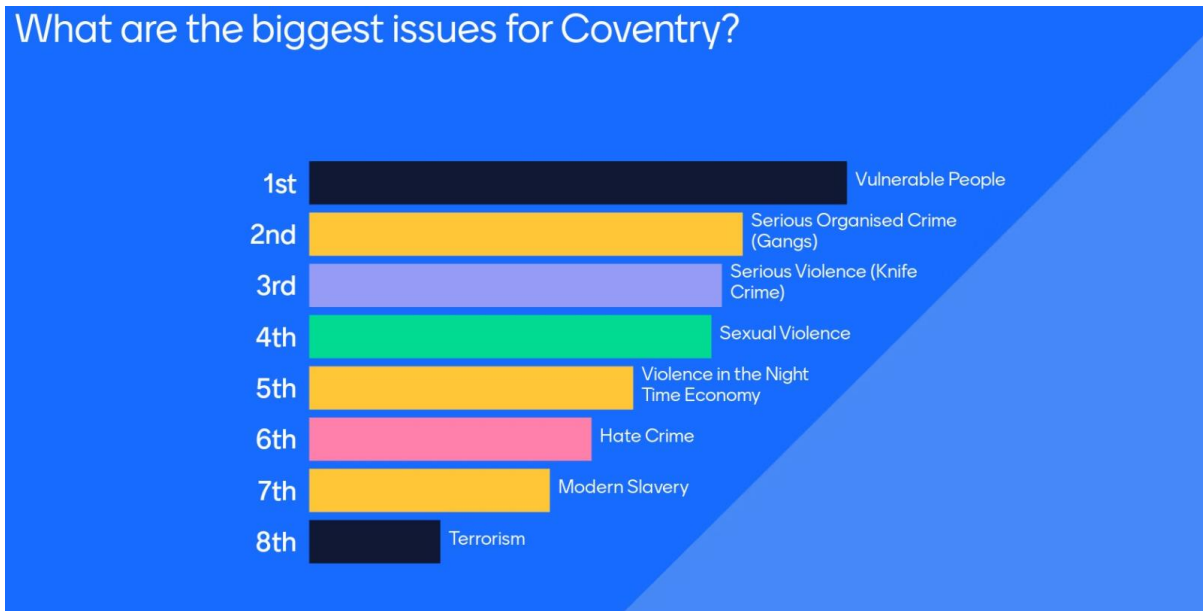
When asked about how we could encourage more reporting. Partners suggested improvements such as improved communication on positive outcomes, better community engagement, simpler reporting systems and raising awareness of reporting systems.

When asked about working better with marginalised communities. Partnerships felt this could be improved by engaging with communities and community leaders, encouraging community champions and providing translated materials.

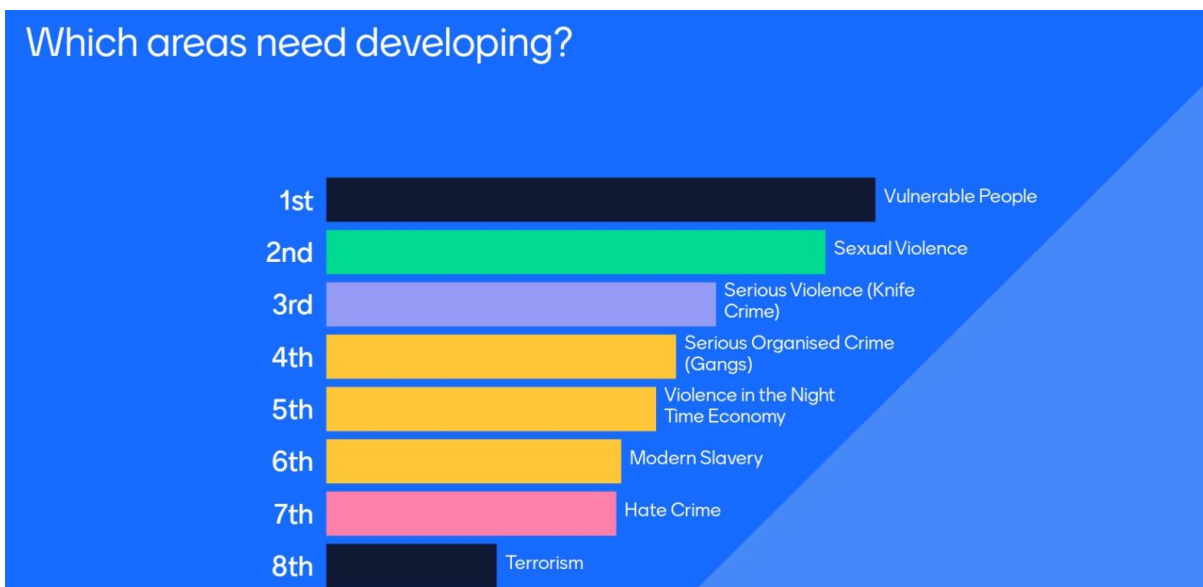


Victim themed workshop

The five priorities in the victim-based workshop were supporting vulnerable people, serious Organised Crime (Gangs), Serious Organised Crime (Knife Crime), Sexual Violence and Violence in the Night-Time Economy.



Partners felt the top areas for development were supporting vulnerable people, sexual violence and serious violence.



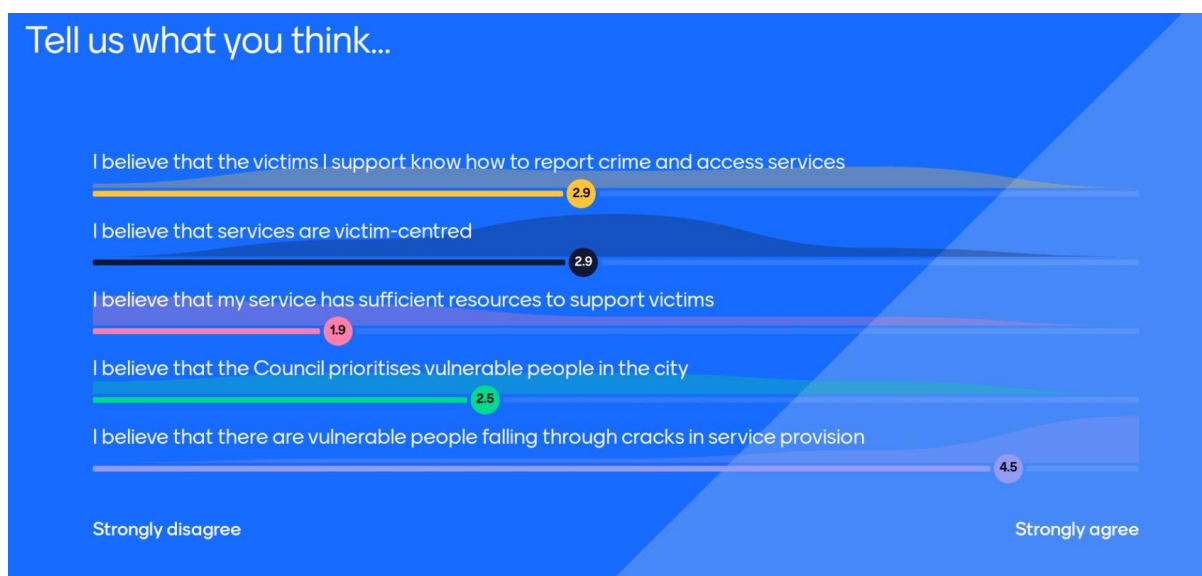
The biggest challenges they felt facing victims were the lack of faith in services, and recognising themselves as victims of crime. That there was a lack of professional curiosity and victim-blaming attitudes.



Partners believed that values such as being trauma-informed, person-focused, open-minded, and proactive in reaching out to victims could be adopted to prevent and support victims.



Partners believed that victims they support generally knew how to report crime and access services. They also felt that the services were victim-focused, though there was room for improvement. Partners expressed concerns about the resources allocated to victim support and were worried about vulnerable individuals potentially being overlooked. They acknowledged that the Council prioritised vulnerable people but noted a need for further improvements in this area.

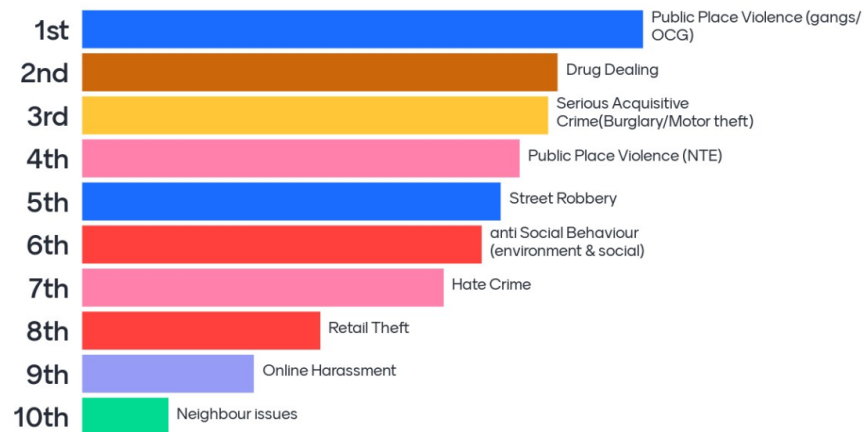


When Partners were asked who we were failing. Partners expressed numerous concerns, including children affected by Adverse Childhood Experiences (ACEs), transitions between youth and adulthood, individuals with complex needs, children missing from home, groups who do not meet statutory criteria, hard-to-reach populations, those affected by homelessness, individuals with drug and alcohol issues and people living in marginalised communities.

Offender

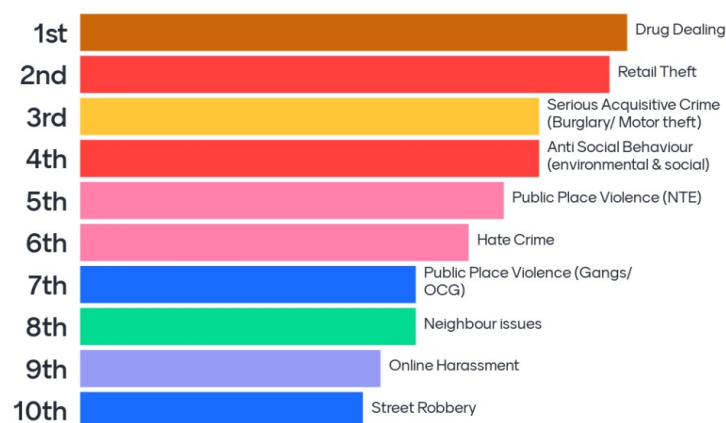
The five priorities identified in the offender workshop were public place violence (gangs), drug dealing and serious acquisitive crime, public place violence (NTE) and street robbery.

Place these offence type in order of importance to address



The group identified a need for further development in addressing drug dealing, retail theft, serious acquisitive crime, ASB, and public place violence.

Place these offence type in order of work needed to develop/improve/done better



Partners in the offending workshop felt the top priority in the city centre to tackle were drug dealing, begging, public place violence, street robbery and retail theft.

Which of these City Centre types are the most important to tackle?



The group felt the most effective way of reducing reoffending was through settled and stable accommodation, mental health support and early intervention initiatives.

what support measures would be most effective in reducing reoffending?



Partners believe that supporting accommodation, mental health, family support, domestic abuse services and non-custodial sentences can help prevent female offenders from reoffending.

What can be done better to support female offenders from reoffending?

A word cloud of suggestions for supporting female offenders from reoffending. The words are arranged in a roughly circular pattern and are color-coded. The suggestions include: 'stable accomodation' (orange), 'whole family approach' (teal), 'social care support' (blue), 'better accomodation' (red), 'non custodial sentences' (blue), 'education and parenting' (pink), 'mental health support' (yellow), 'not sure about this' (light blue), and 'domestic abuse support' (pink).

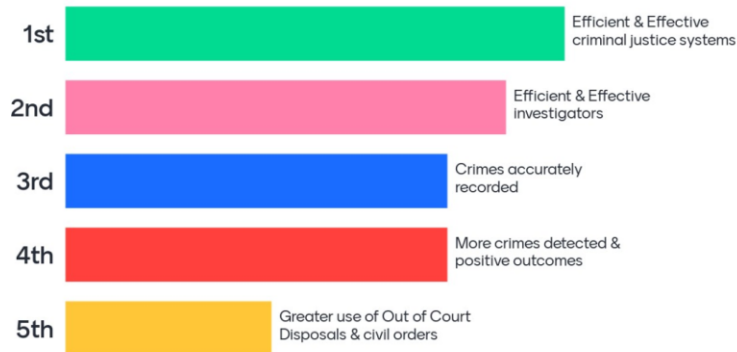
stable accomodation
whole family approach social care support
better accomodation
non custodial sentences
education and parenting
mental health support
not sure about this
domestic abuse support

When asked about improving communication with the public.

Partners recommended better communication, enhanced multi-agency networks and increased sharing of success stories with the public.

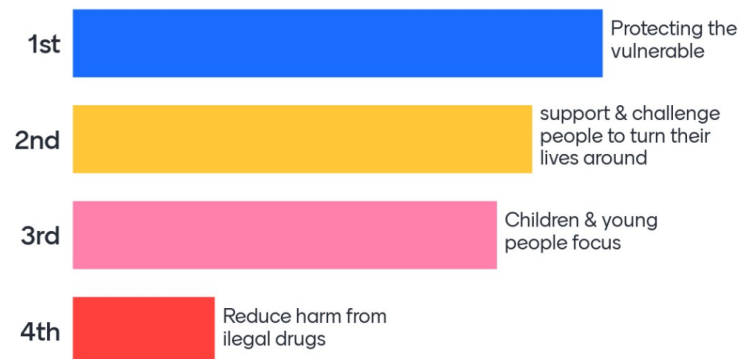
Partners evaluated the significance of the Police Crime Commissioners' plans to bring offenders to justice. They determined that an efficient and effective criminal justice system was the most crucial element, followed by the importance of efficient and effective investigations and accurate crime recording.

Below are examples given by the Police and Crime Commission plan for bringing offenders to Justice. Please place in order of importance



Upon reviewing the Police Crime Commissioners' Plans for Prevention and Rehabilitation, partners determined that protecting the vulnerable was a top priority. This is followed by supporting individuals in turning their lives around and focusing on children and young people.

Below are examples from the Police commissioners Crime Plan for Prevention & Rehabilitation. Please place in order of importance



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Appendix 5 – Members Survey Results

The Coventry Community Safety Partnership (CCSP) consultation was presented to the Scrutiny Committee on 18th December 2024. Members received a survey afterwards to provide feedback. The results of the survey are presented below.

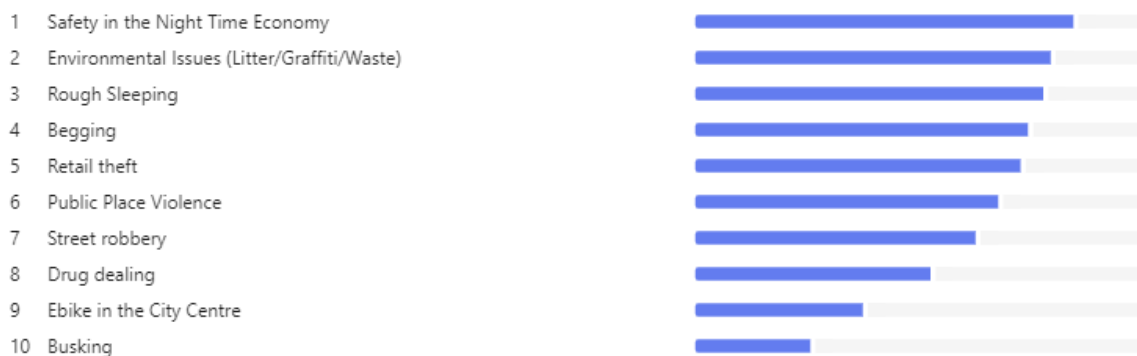
Members identified Tackling Serious Violence (gangs and knife crime) as a top priority, followed by addressing Anti-Social Behaviour (ASB), Domestic Abuse and Safety in the Night-Time Economy (NTE).

What topics do you think should be a priority for the CSP?



The primary concerns in the city centre included Safety in the NTE, environmental issues rough sleeping and begging.

What are your biggest concerns in the City Centre?



Members indicated that resource constraints were the biggest challenges faced by agencies.

What is the biggest challenge to Local Authorities and partners in dealing with location based issues. ?

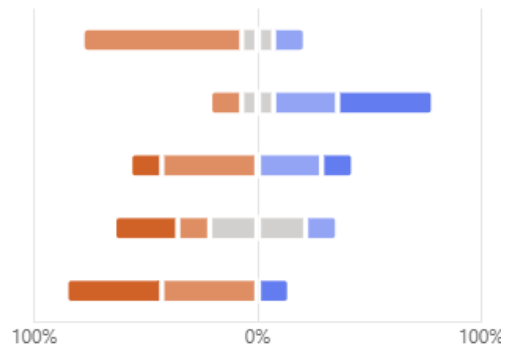


There was a consensus on the need for agencies to work collaboratively to address location-based issues such as ASB.

Do you agree or disagree with the following statements?

● Strongly Agree ● Agree ● Neither agree or Disagree ● Disagree ● Strongly Disagree

- Agencies work collaboratively to address location-based issues.
- There are sufficient resources across agencies to address location-based issues
- More CCTV is required across the city
- Resources are too heavily weighted to impact areas (areas with more demand) within the City
- More investment is required to support services to tackle the underlying issues to why people commit crime.



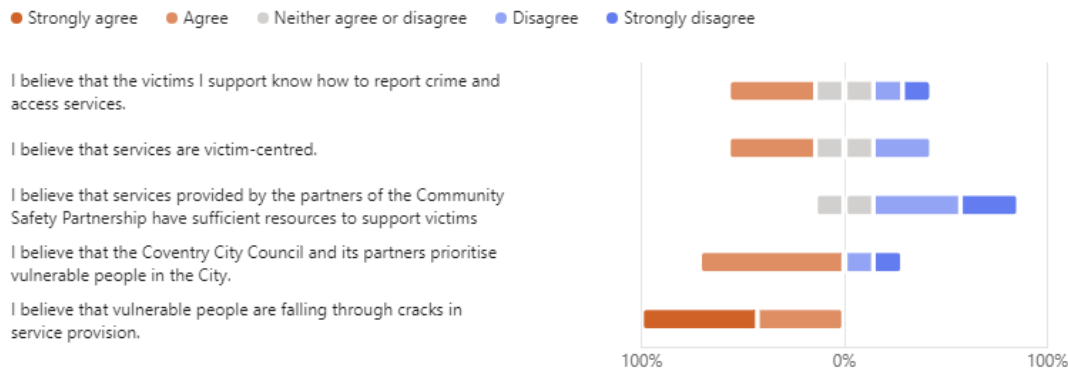
Members noted that a perceived lack of faith in services was a notable challenge for victims, emphasising the need for improved support systems for crime victims. They observed that victim-blaming attitudes presented additional difficulties for victims.

What is the biggest challenges facing victims of crime ?



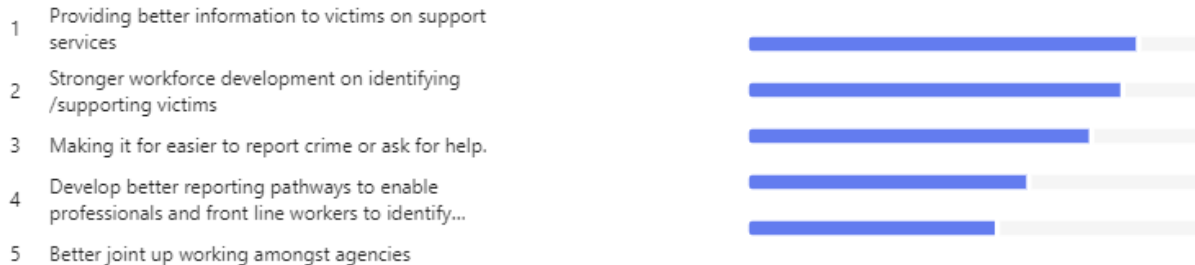
Members felt that victims knew how to report crime and access services. The Council prioritises victims and generally offers victim-focused services. However, there are concerns about insufficient resources and the risk of vulnerable people falling through the gaps of service provision.

Do you agree or disagree with the following statements?



Members concluded that we can better support victims of crime by improving the information provided on support services. Additionally, we should focus on developing our workforce to effectively identify and support victims while also making it easier to report crimes or seek assistance.

How can we better support victims of crime?



It was suggested that offending and reoffending could be better addressed through supported accommodation and early intervention via mentoring and support to deter individuals, particularly the youth, from entering the criminal justice system.

What measures should be taken to reduce reoffending?

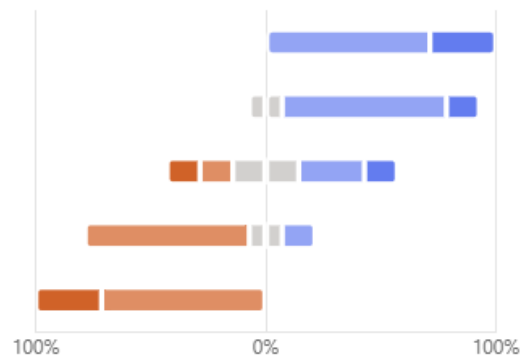


There is a need to ensure that the role and activities of the CCSP are adequately promoted to enhance public understanding of its functions.

Do you agree or disagree with the following statements?

● Strongly Agree ● Agree ● Neither Agree or Disagree ● Disagree ● Strongly Disagree

The public have a good understanding of the work being done to prevent reoffending?
 There are sufficient resources available between agencies to support offenders
 Prison leavers should receive increased priority for housing on homefinder programme
 Coventry has strong partnerships to prevent and reduce the number of children and young people entering the criminal just...
 I believe that vulnerable people are falling through cracks in service provision.

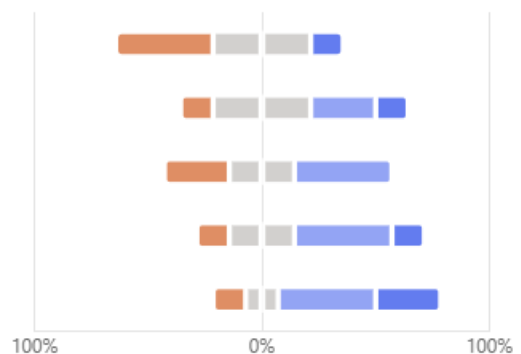


Members generally understood the CCSP but lacked knowledge of its lower-level structure. The survey indicated a need for better communication of priorities and their monitoring to both members and the public.

Do you agree or disagree with the following statements?

● Strongly agree ● Agree ● Neither agree nor disagree ● Disagree ● Strongly disagree

I have a clear understanding of the roles and responsibilities of the Community Safety Partnership
 I have a good understanding of the structures underneath the Community Safety Partnership and the accountabilities each...
 I understand the priorities of the board and how it monitors the performance of its priorities.
 I know how to raise issues through the Community Safety Partnership if I have concerns.
 The public has access to information regarding the Community Safety Partnership and its priorities as a partnership.



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Coventry Community Safety Partnership



Coventry Community Safety Partnership (CCSP)

Under the Crime and Disorder Act 1998, the Council and the Police have a joint responsibility for preventing and reducing crime and disorder within their area. They are “Responsible Authorities” and have a duty to cooperate through the “Coventry Community Safety Partnership” (CCSP).

The “Responsible Authorities” within the CCSP are:

- Coventry City Council (Regulatory Services, Public Health, Youth Offending Services)
- West Midlands Police
- West Midlands Fire and Rescue Authority
- West Midlands Probation Services
- Coventry and Warwickshire Integrated Care Board

Other stakeholders include:

- Social Housing Providers
- Voluntary Community and Social Representatives
- Elected Members.

The CCSP meets each quarter. The purpose of the group is to bring together local partners to solve issues around crime, disorder, Anti-Social Behaviour (ASB), drugs and alcohol misuse and reoffending.

Every three years Community Safety Partnerships are required to develop a Community Safety Partnership Plan under the Crime and Disorder Act 1998. The plan provides an overview of the work and priority areas that fall under the responsibility of the CCSP.

In creating the Community Safety Partnership Plan the CCSP is required to review the levels and patterns of crime and disorder in the area. This review is known as a Strategic Assessment. Within Coventry, the Strategic Assessment is created on behalf of the CCSP, by West Midlands Police Partnership Intelligence Team (PILT) and analyses data from the previous 12 months. Data comes from a range of sources including partnership data and national data where relevant.

The Coventry Community Safety Partnership Plan 2025- 2028.

The Coventry Community Safety Partnership Plan outlines the priorities and objectives of the CCSP for the next three years. In addition to reducing crime and disorder, the plan focuses on fostering a greater sense of safety and enhancing well-being within our communities.

The plan focuses on three key priorities

1. Reduction of offending, preventing reoffending and reducing serious violence
2. Public place safety and reassurance
3. Tackling exploitation and protecting victims of crime

The priorities are grounded in problem-oriented policing model, focusing on victim, location, and offender. Each priority is closely connected, with all three influencing and supporting one another to ensure a comprehensive and effective approach to community safety.



The Coventry Community Safety Partnership Plan

The CCSP Plan sets out our objectives in reducing crime and ASB. The CCSP cannot achieve this alone and has strong links with other strategic boards in the city. The plan has been aligned with other strategic plans within the city. This includes

[One Coventry Plan](#)

A key priority of the One Coventry Plan is improving and tackling inequalities within our communities. The CCSP Plan supports the reduction of crime and violence and supports the most vulnerable and those likely to be targets of exploitation

Preventing and reducing violence, abuse and exploitation, crime and ASB is embedded in a range of our strategies and work under the [Serious Violence Duty](#) has identified how the local authority and its partners can collaborate to reduce serious violence.

[Coventry Youth Justice Plan](#)

Outlines its priorities for reducing violence and offending as well as addressing exploitation in children and young adults within our city. This is also supported by the [Coventry Safeguarding and Children's Partnership Exploitation Strategy](#) and the [Early Help Strategy](#) which are key to providing support and early intervention to families within the city.

[Adult Safeguarding Strategic Plan](#)

Outlines the Coventry Safeguarding Board's priorities. This supports the CCSP priorities by making it a key focus to prevent harm, abuse and neglect of vulnerable adults

[Domestic Abuse Strategy](#)

specifically addresses how domestic abuse will be tackled, and how victims will be supported, and measures put in place to prevent exploitation and prevent reoffending

Drugs and alcohol significantly influence crime and Anti-Social Behaviour, as well as reoffending rates. The Drugs and Alcohol Strategy will support the CCSP.

Board	Coventry Protect, Prepare and Resilience Group	Harm Abuse Reduction Partnership	Prevent	Coventry Reducing Reoffending Board	City Tasking Group	Night Time Economy Steering Group	Coventry Serious Violence Prevention Partnership
Issues Covered	Protect and prepare against Counter Terrorism	Modern Slavery Hate Crime Vulnerable persons	Counter-Terrorism Radicalisation Extremism	Offending /Reoffending Integrated Offender Management Probation	Place based Issues ASB PSPO enforcement	Safety in the Night Time Economy	Serious Violence Duty
Subgroups		Coventry Modern Slavery Partnership Coventry Slavery & Exploitation Risk Assessment Conference	Channel Panel		City Centre Case Management Forum.	Responsible Authorities	
Issues covered		Modern slavery cases	Radicalisation Extremism cases		City Centre ASB issues	Licensed premises	
Supporting Groups	Domestic Abuse Local Partnership Board	Drugs and Alcohol Steering Group					
Issues covered	Domestic Abuse Strategy	Drugs and alcohol strategy					

Regional Working

Our CCSP recognises that crime and disorder extend beyond our city's boundaries, requiring regional collaboration. We work closely with the Office of the Police Crime Commissioner (OPCC) and West Midlands Violence Reduction Partnership (VRP), aligning our plan with regional partners to effectively use our resources. Our Plan aligns with the priorities of the West Midlands Police and Crime Plan for 2025-2029 and the West Midlands Violence Reduction Partnership Strategy for 2023-2026.

<https://www.westmidlands-pcc.gov.uk/your-commissioner/police-crime-plan/>

[West Midlands Violence Reduction Strategy 2023-2026](#)

Chair Profile – Cllr Abdul Khan – Chair of Community Safety Partnership

"Coventry Community Safety Partnership plan highlights our commitment to making our city safer. Collaborating with regional partners allows us to address crime and disorder effectively. Aligning with the West Midlands Police and Crime Plan and the Violence Reduction Partnership Strategy ensures we maximise our resources to support the community.

We focus on improving public safety through proactive policing and community engagement. Reducing reoffending is key, as we provide rehabilitation and employment support to ex-offenders. We are dedicated to reducing serious violence via targeted interventions and support services.

Protecting vulnerable individuals from exploitation is paramount, and our coordinated efforts ensure victims receive the necessary support and protection. Partnership working and community engagement are essential to creating a safer environment for everyone." - Cllr Abdul Khan, Chair of the Coventry Community Safety Partnership



Strategic Assessment

The Strategic Assessment (SA) is an annual review of crime patterns and demand on policing and other partners in Coventry. The SA fulfils the partnerships responsibility outlined in the Crime and Disorder Act 1998.

The purpose of this SA is to provide an analysis of the levels and patterns of crime including changes in levels and patterns since the previous SA. Secondly, the SA will highlight threats and emerging threats that the CCSP should prioritise when exercising their functions in order to mitigate threats and reduce harm to our communities.

The SA will aim to provide the CCSP with an overview of the 12-month period of April 2023 to March 2024 to support strategic decisions for the next year

Coventry – Profile of the city

Coventry is a diverse and cohesive city with a relatively young population, with a median age of 35 years old compared to the UK average of 40 years old. In recent years, the city has experienced an 8.9% growth in its population, from 316,915 in 2011 to 345,300 residents on Census Day 2021. This is higher than the rate in the region (6.2%) and England (6.6%).

The city's population has grown in recent years, particularly amongst younger adults. The growth can likely be attributed to the success of the city's two universities in attracting students locally and internationally; as well as better-paid jobs in certain sectors of the local economy.

Newly arrived communities play a vital role in Coventry's social fabric, economic development, and economic growth. This group includes students, people fleeing conflict and economic migrants. Coventry's long-standing tradition of providing safety and refuge to those escaping conflict is a testament to the city's welcoming and inclusive ethos.

Strategic Assessment – Key Findings



Total Recorded Crime (TRC)

- 38,508 crimes in Coventry in 23/24 this was a 10.1 % decrease to last year.
- ASB has increased by 22.6%



Assault and Battery – Top Offence

- 4345 offences accounting for 11.2% of TRC
- 8.1% Decrease compared to previous year.
- 20.6% of these offences were influenced by drugs and alcohol.



Shoplifting and Theft – Second Highest Offence

- 44.5% increase from the previous year
- Accounted for 6.7% of total recorded crime (TRC)



Acquisitive Crime

- Has decreased by 7.6%
- Vehicle Crime (second highest proportion of acquisitive crime) has decreased by 10.5%



Drugs and Substance Misuse

- Overall decrease in a number of offences linked to drugs and alcohol compared to the previous year.
- Decrease in the number of drug-related crimes



Serious Youth Violence

- Overall decrease in Serious Youth Violence by 5.8%
- Increase in child exploitation (county lines) by 18.5%



Child Abuse

- Decrease in Child Abuse by 9.9%



Violence against Women and Girls

- Higher number of female victims for Domestic Abuse and Sexual Offences
- Total number of Domestic Abuse Offences reported to police has decreased
- Referrals to Domestic Abuse Support Services have increased.
- Increase in sexual offences recorded to and by the police.

Areas



St Micheal's Ward

- St Micheal's ward saw the highest volume of crime (8209). This accounted for 31% of TRC



Foleshill Ward

- Foleshill Ward saw the second highest volume of crime (3496). This accounted for 9.1% of TRC

Priority One - Reducing Offending, Reoffending and Serious Violence

Reducing Serious Violence.

Under the Police Crime, Sentencing and Court Act 2022, Coventry City Council and its partners have a duty to collaborate to reduce serious violence within its area (The Serious Violence Duty (SVD)). Since 2020 the partnership has had a particular focus on those 25 years and under because, as a group they are most at risk of becoming involved in serious violence. The SVD requires the partnership, to address the root causes of violence for all and try to reduce the levels of serious violence over the long term.

In 2020, the partnership adopted a Public Health approach to tackling serious violence and committed to a 10-year plan to address serious violence.

A Public Health approach focuses on understanding and addressing the root causes of violence rather than just responding to its symptoms. It treats violence as a preventable issue, much like a disease, and works to reduce it through early intervention, prevention, and long-term solutions. This approach involves analysing data to identify risk factors, engaging communities, and promoting collaboration between agencies to tackle the wider social and economic factors that contribute to violence.

Coventry Youth Violence Prevention Strategy

- Empowering young people to be safe in our city #SafeCoventry ■

1 Building strong foundations

We will scope the issues relating to violent crime by gathering data and intelligence, engaging with our communities, analysing the evidence and implementing a public health approach

2 Primary Prevention

We will passionately advocate for early years support and seek to maximise our early help offer to parents and their children. We will recognise when intervention is needed at an early stage and put appropriate support in place at a population level

3 Secondary Prevention

We will recognise those who are vulnerable to exploitation and intervene to prevent further harm. We will encourage a culture of professional curiosity, training staff about contextual safeguarding and trauma informed practice

4 Tertiary Prevention

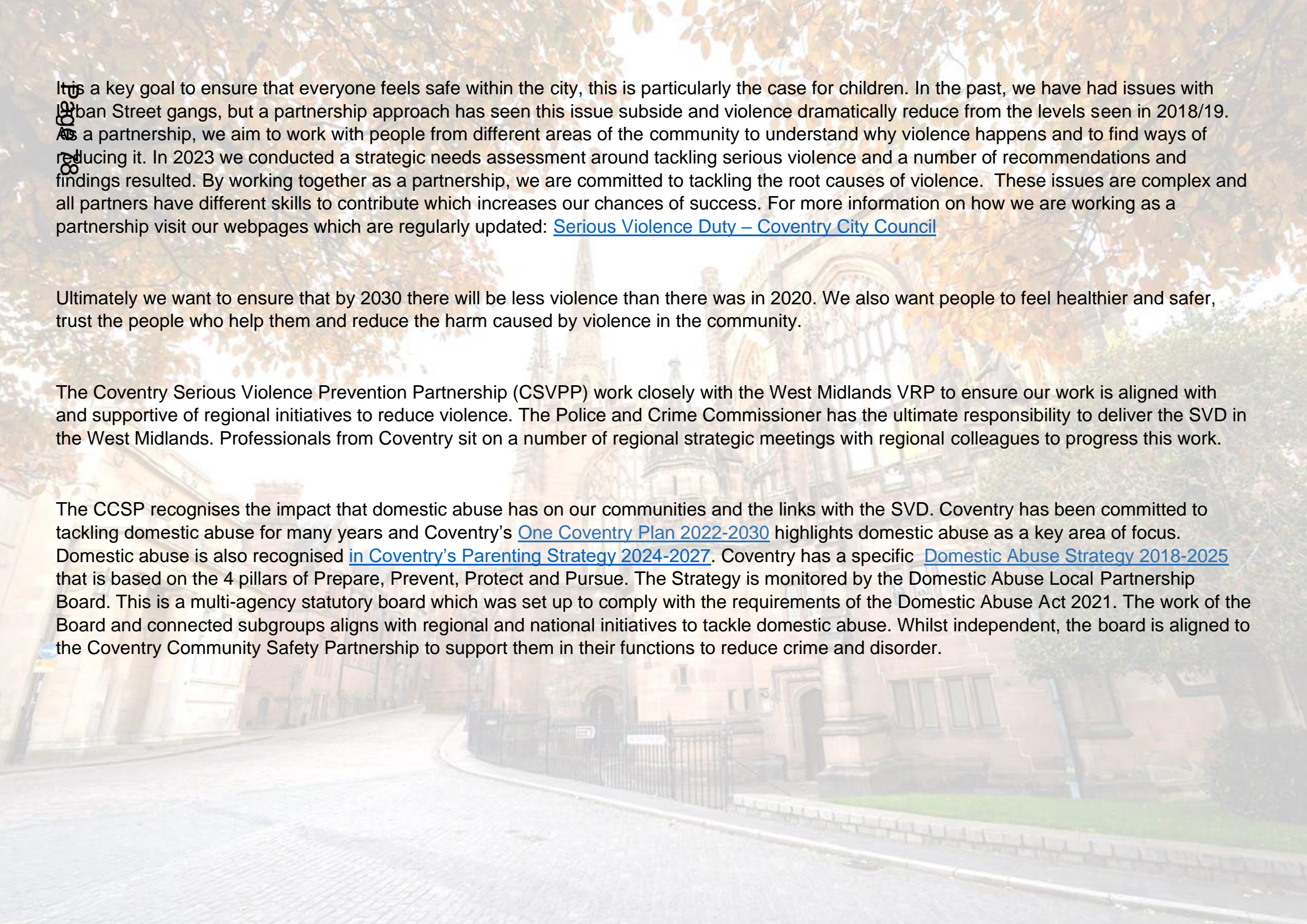
We will support those who have been harmed and intervene to support them to cope, recover and rebuild their lives

5 Enforcement and Criminal Justice

We will work in cross-cutting ways, developing innovative practice to ensure our young people are not unnecessarily criminalised using alternative methods of justice. We will deliver effective enforcement across the City and maximise the safety of individuals vulnerable to exploitation

6 Attitudinal change using effective communication

We will work with communities and organisations to challenge the narrative of violence and empower young people to be safe in our city

The background of the page is a faded, artistic photograph of a street scene. It shows a cobblestone-paved street curving to the right, lined with trees that have autumn-colored leaves. In the background, there are brick buildings, including one with a prominent tower and arched windows, possibly a church or a historic building. The overall tone is soft and slightly hazy.

It is a key goal to ensure that everyone feels safe within the city, this is particularly the case for children. In the past, we have had issues with Urban Street gangs, but a partnership approach has seen this issue subside and violence dramatically reduce from the levels seen in 2018/19. As a partnership, we aim to work with people from different areas of the community to understand why violence happens and to find ways of reducing it. In 2023 we conducted a strategic needs assessment around tackling serious violence and a number of recommendations and findings resulted. By working together as a partnership, we are committed to tackling the root causes of violence. These issues are complex and all partners have different skills to contribute which increases our chances of success. For more information on how we are working as a partnership visit our webpages which are regularly updated: [Serious Violence Duty – Coventry City Council](#)

Ultimately we want to ensure that by 2030 there will be less violence than there was in 2020. We also want people to feel healthier and safer, trust the people who help them and reduce the harm caused by violence in the community.

The Coventry Serious Violence Prevention Partnership (CSVPP) work closely with the West Midlands VRP to ensure our work is aligned with and supportive of regional initiatives to reduce violence. The Police and Crime Commissioner has the ultimate responsibility to deliver the SVD in the West Midlands. Professionals from Coventry sit on a number of regional strategic meetings with regional colleagues to progress this work.

The CCSP recognises the impact that domestic abuse has on our communities and the links with the SVD. Coventry has been committed to tackling domestic abuse for many years and Coventry's [One Coventry Plan 2022-2030](#) highlights domestic abuse as a key area of focus. Domestic abuse is also recognised [in Coventry's Parenting Strategy 2024-2027](#). Coventry has a specific [Domestic Abuse Strategy 2018-2025](#) that is based on the 4 pillars of Prepare, Prevent, Protect and Pursue. The Strategy is monitored by the Domestic Abuse Local Partnership Board. This is a multi-agency statutory board which was set up to comply with the requirements of the Domestic Abuse Act 2021. The work of the Board and connected subgroups aligns with regional and national initiatives to tackle domestic abuse. Whilst independent, the board is aligned to the Coventry Community Safety Partnership to support them in their functions to reduce crime and disorder.

Reducing Offending, and Reoffending

In 2010, the Policing and Crime Act (2009) amended Section 17 of the Crime and Disorder Act (1998) to make Community Safety Partnerships responsible for formulating and implementing a strategy to reduce reoffending by adult and young offenders.

Reducing offending, re-offending and tackling substance misuse is a key priority for the CCSP.

According to the 2020 [Neighbourhood Crime IOM Strategy](#) a total of 80% of all crime is created by those reoffending, a significant proportion of which is neighbourhood crime. Effective Integrated Offender Management is essential to have a driver to reduce crime and disorder.

Under the Coventry Community Safety Partnership, the Coventry Reducing Reoffending Board are responsible for co-ordinating the CCSP response to reducing reoffending. Offending and reoffending are focused on breaking the cycle of offending by focusing on the Government 7 pathways which are:

- Accommodation
- Attitudes, thinking and behaviour
- Children and family
- Drugs and alcohol
- Education, training and employment
- Finance, benefit and debt
- Health

By tackling these root causes, the partnership is more likely to have a more sustained result in reducing, offending, reoffending and serious violence.

The work in achieving a reduction in offending and reoffending is supported by the Youth Justice Board through the [Coventry Youth Justice Plan](#).

The misuse of drugs and alcohol are major factors contributing to both offending and reoffending. This is evidenced by the work of the Drugs and Alcohol Strategy group and the associated Drugs and Alcohol Strategy.

Reducing Offending, Reoffending (Key achievements)

Page 80

- The CSVPP successfully implemented the Serious Violence Duty locally in accordance with legislation.
- Creation of Serious Violence Prevention Operational Plans
- Successfully commissioned and delivered the school holiday outreach work which has significantly reduced robbery, ASB and knife crime in Coventry city centre.
- Continued commitment to fund “Step Together” an after-school chaperone service aimed at providing safe egress routes from schools in violence hotspot areas.
- Coventry has launched the “Our Tomorrow” campaign which is a regional-wide initiative which delivers a youth-led counter-narrative against violence.
- Successful delivery of the Community Initiative to Reduce Violence (CIRV) Programme which is designed to engage with those involved in violence and connect them to an exit pathway from gangs, violence and country lines.

Summary of the issues (information from Coventry’s Strategic Assessment (SA))

- Serious Youth Violence (SYV) decreased by 5.8% from last year. It accounted for 4.2% of TRC and 29% of serious violence offences.
- Violence with Injury offences were the most common offence (52.2% of TRC).
- Of the Violence with Injury offences 62.3% of the victims are male and of these 40.1% are 10-15 years old.
- Within Serious Youth Violence, robbery accounted for 24.6%. 88.7% of the victims were male. (37.9% were 16-20 years old. 31.2% were 10-15 years old.
- Knife crime accounted for 14.9%. The majority of victims were 86.2% male – 37.7% were 15-19 years)
- Gun crime accounts for 1.6%.
- Of the 8 homicides in Coventry 1 was linked to youth violence
- Domestic abuse accounts for 14.9% of TRC in 2023/24. Whilst this has decreased from last year, there has been an increase in referrals made to DA services.
- Sexual offences have increased by 6.8%. Rape accounted for 41.8% of Sexual Offences and 58.2% accounted for other sexual offences.
- Violence against Women and Girls (VAWG) has decreased by 8.0%.
- Stalking and Harassment was the top offence (48.5%) of which were DA related.

What are residents telling us?

- Residents did not feel that youth violence and violent crime were significant issues in their area.
- Residents felt it should be a key consideration of the CCSP (rating it in the top two issues).
- Resident felt to reduce crime it was important to have youth services and outreach work within the city.
- There was some public support to invest in specialist services to reduce reoffending.

How will we respond?

Even though residents may not see the immediate impacts of youth violence, the data and consultation with young people indicate that it is a significant problem for the city and therefore we will continue to progress preventative work in this area. A key way in which we prevent violence is to continue to build a support network for children by working with the Coventry Youth Partnership.

Objective	How we plan to achieve this
Reduce the level of serious violence within the city year on year.	<ul style="list-style-type: none">✓ Targeting the transition of youth offenders transitioning into adult probation services to reduce the likelihood of them being involved in serious violence.✓ Increasing the use and enforcement of protective orders in order to safeguard victim survivors of domestic abuse (restraining orders, Domestic Violence Protection Order, Stalking Protection Order, Forced Marriage Protection Order, Domestic Abuse Protection Order etc) and manage offenders✓ Increase the number of offenders charged to court for offences of domestic abuse resulting in conviction that offers protection to victims' survivors, whilst also ensuring that more victims are supported to engage with the criminal justice process✓ Increase the number of domestic abuse offenders who are drug tested whilst in custody✓ Review the requirements of the Victims and Prisoners Act 2024 and how the Duty to Collaborate will affect partners within the CCSP.

<p>Reduce the level of children entering the Criminal Justice System</p>	<ul style="list-style-type: none"> ✓ Preventing violence through the education system to ensure that schools are providing a safe and supportive environment. ✓ Providing positive alternatives and targeted interventions for young people at risk of becoming involved in violence. ✓ Empowering young people to lead on communication strategies that challenge the narrative of violence and offer positive messages (i.e. My Tomorrow Campaign).
<p>Reduce the levels of youth and adult reoffending</p>	<ul style="list-style-type: none"> ✓ We will be reviewing the 7 support pathways associated with preventing reoffending and what measures and be used to strengthen and support reoffending with Coventry. ✓ Understanding Coventry's unmet needs and identifying vulnerable individuals or groups not accessing or representing in treatment services. ✓ Review and develop of all treatment pathways of people involved in the criminal justice system. ✓ Exploration of opportunities to take early intervention and preventative approaches to divert persons with substance misuse issues away from the criminal justice system. ✓ We will undertake a review of the impact of neurodiversity on offending and reoffending and identify measures to appropriately support neurodiverse offenders through rehabilitation. ✓ Review and monitor the impact of the Integrated Offender Management Scheme on reducing reoffending.
<p>Reduce duplication of data production surrounding crime and ASB.</p>	<ul style="list-style-type: none"> ✓ We are working towards a single data product to serve multiple meetings. This will give a better holistic view of the current crime and ASB picture in the city.

Priority 2 - Public Place Safety and Reassurance

Public place safety and reassurance is a key priority of the CCSP. It is essential to address issues that impact the daily lives of those living and working within Coventry, as people desire to feel secure in their communities.

According to our 2024 Crime Survey, residents indicated that ASB had increased over the past 12 months. They identified environmental ASB and general ASB as the most significant issues in their neighbourhoods, emphasising that addressing these should be a top priority for the CCSP. Furthermore, 43.8% of residents reported being victims or knowing victims of crime; however, 27.5% did not report these incidents to the police.

The survey also assessed perceptions of safety. While 60% of respondents felt safe during the day, there was a notable increase in feelings of insecurity during the evening, with 63.2% expressing concerns. Additionally, residents raised issues about safety in the city centre, both during the day and at night.

The One Coventry Plan prioritises the reduction of crime and disorder. It is essential to ensure we have secure neighbourhoods and a dynamic city centre that provides a safe environment both during the day and at night.

Under the Coventry Community Safety Partnership, the City Tasking Group is responsible for managing place-based issues within Coventry. The partners within the group work collaboratively, using problem-solving methods to effectively utilise each partner's resources in addressing issues of crime and ASB. The group also monitors the effective use of powers to tackle ASB introduced through Public Spaces Protection Orders within the city.

A significant challenge to the group is the demand and resource. The group have been tackling these issues through the effective use of operations. These are regionally led through the OPPC or locally led through West Midlands Police. Operation Advance is a force-wide initiative in the West Midlands where police and partners work together to deliver a 24 hours of intensive policing operations.

ASB within the city centre has been a key concern raised by both partners and the public. In response, a dedicated City Centre Partnership Group has been established. This group collaborates to address prolific offenders, working closely with drug and alcohol support services and implementing interventions, including enforcement measures such as fines, penalties, or legal actions to deter and address such behaviour.

CCSP also prioritises safety within the night-time economy. The Coventry Nighttime Economy Steering Group oversees and coordinates a partnership approach to the tactical delivery of initiatives that support strategic priorities such as preventing violence, reducing harm, and curbing ASB. Over the past five years, the group has set a key goal of ensuring a safe and healthy night out through key initiatives, including the Best Bar None and Ask Angela schemes. The group aims to continue this work while also striving to obtain Purple Flag status, an accredited scheme that recognises excellence in managing the nighttime economy.

The CCSP also recognise that a significant root to ASB and crime is in underlying drug and alcohol addiction. We therefore recognise the importance of connecting with Coventry's Drug and Alcohol Strategy

Public Place Safety and Reassurance (Key Achievements)

- Key initiatives have been introduced into night time venues in the city such Best Bar None and Ask Angela.
- Successful initiatives on drinking spike campaigns
- The continued support of the Street Pastors programme to support safety in the nighttime economy.
- Successes of joint partnership initiatives to deal with derelict and abandoned properties.
- Renewal of Citywide PSPO to bring in measures to control public space drinking and off-road motorbikes.
- Operation Eternity and Guardian have been implemented to tackle ASB hotspots within the city.
- Police operations have been used to bring intensive patrol resources together to reduce crime.

Public Place Safety and Reassurance (Summary of the Issues)

- Theft from Shops was second highest offence in total recorded crime. This has increased by 44.5%
- Overall there was a 22.6% increase in ASB last year. This was made up of 67% nuisance, 18% Environmental and 15% personal.
- St Michaels neighbourhood saw the highest level of ASB incidents (21.3%)
- Fly tipping has decreased by 13.5%. 24% of fly tipping occurs in Foleshill.
- There were 30,376 offences with a recorded victim. 48.0% of alcohol related incidents took place in the Night Time Economy (NTE) hours. Females were slightly higher than males (53.2%) The age with the highest incidents were female 35-39 years old and males 30-34 years old.
- This year there has been a decrease of drug offences in Coventry (14.8%). St Michaels ward was the highest 41%. 64.2% of offences in the city centre is possession of drugs and 35.7% were 'Possession with intent to sell.

What you are telling us

- 63.2% disagreed when asked if they felt safe at night.
- 64% felt that ASB had increased.
- 51.52% of residents do not go into the city centre during the daytime and 83% at night. A significant reason is that they do not feel safe.
- The top three priorities were Environmental ASB, ASB and motor vehicle/theft.
- 43.8% said they had been a victim of crime.
- 27.5% didn't report this to be police. 58.9% of which felt nothing would happen if they reported it.
- Residents want more high-visibility patrols by police or wardens. More enforcement against ASB and crime.
- There was a call for more Neighbourhood Watch schemes.
- Residents want more guidance on reporting crime and more information on action taken against crime

How will we respond

Evening and Nighttime Economy Strategy to be developed and consulted on that will provide the framework to achieving a safe and thriving night life in Coventry. Obtaining Purple Flag status will support a safe and thriving night life in Coventry.

We will use partners collective powers to respond to ASB. This will be focussed on areas causing the most demand. We will use a problem-solving approach so our police and partners resources can be used in the most effective way.

We will work with communities to enable them to regularly meet with their local policing team and other local partners so that they can raise questions and issues of community issues, find about partner priorities and receive information on what action has been taken in their areas.

Objective

How we plan to achieve this

To create a safe and healthy night out within the city centre.

- ✓ Working with partners to obtain Purple Flag status for the city.
- ✓ Developing an Evening and Nighttime Economy Strategy.
- ✓ Enhancing the safety and health in the NTE through a wide range of initiatives (Best Bar None, Ask Angela and Street Pastors).

Reduce the yearly rates of ASB within the city by improving the partnership response to ASB in the city.

- ✓ Using Problem-Solving Policing in a partnership context to identify repeat demand hotspots and effectively deploy resources to reduce ASB.
- ✓ Implementing an effective monitoring of PSPO enforcement through the City Tasking board and undertaking a review of new powers in the Crime and Policing Bill.
- ✓ Deliver an initiative in Hillfields aimed at reducing crime and disorder while promoting community cohesion.
- ✓ Using a case management approach to tackle city centre ASB issues such as public space drinking, drug taking, shoplifting and begging.
- ✓ Implement education and enforcement initiatives to reduce the levels of environmental ASB by targeting fly-tipping hot spots and areas with high multi-occupancy areas.

Improve community engagement with the residents of Coventry so that they have a great influence on policing and partnership priorities in the neighbourhood where they live.

- ✓ Identifying through the ASB strategy work on improving information to the communities on reporting the crime and providing information on crime outcomes.
- ✓ Conduct Police and Communities Together (PACT) meetings in every city ward to enhance community engagement.

Priority 3 - Tackling Exploitation and Protecting Victims of Crime

A key priority of the CCSP is protecting the victims of crime, particularly the most vulnerable in our communities. It is equally important that, as a partnership, we identify those at risk of exploitation and implement measures to reduce these risks, helping to prevent exploitation. As exploitation often remains hidden within our communities, we must raise awareness of these crimes and ensure our frontline agencies are equipped to recognise individuals at risk. This will enable the creation of effective referral pathways to provide the appropriate support.

Within the West Midlands, preventing the exploitation of children, young people and adults is a key priority for the VRP. The VRP have established an Exploitation and Missing Regional Strategic Board to improve the response to children and young people who are at risk to exploitation.

The newly established [Coventry Safeguarding Children's Partnership](#) leads on the legal duties place on local authorities to make arrangements locally to safeguard and promote the welfare of children in their areas. Coventry's Horizon Team lead on Child Exploitation including Child Sexual Exploitation (CSE) and County Lines. This is also supported by the work outlined in the Youth Justice plan.

The [Coventry Safeguarding Adults Board](#) (CSAB) lead on the protection of vulnerable adults. The CSAB priorities support the CSP by ensuring the safeguarding and protection of vulnerable adults, particularly those with care and support needs.

Coventry's Domestic Abuse Local Partnership Board lead on the protection of victims of harmful practises within the context of domestic abuse including Honour Based Abuse (HBA), Forced Marriage (FM) and Female Genital Mutilation (FGM).

Within the CCSP, exploitation is managed through the Harm Abuse Reduction Partnership. The group manages issues such as hate, modern slavery and vulnerable adults. Over the last few years hate crime has been tackled in partnership with Remedy, West Midlands Police and Citizen through the Hate Crime Forum. The Community Safety Partnership has also used the community safety fund to implement the "Stand by Me" campaign to promote by-stander awareness training through professionals and volunteer groups in the city.

Significant progress has been made in addressing adult modern slavery over the last two years. Significant work has been undertaken to:

- Establish proper reporting and data monitoring processes.
- Effective management of cases of adult exploitation via increased staff training, awareness, and the establishment of a risk assessment conference.
- Form a strategic modern slavery partnership to oversee all aspects of our response to adult exploitation.
- Improve the discharging of our statutory duties under the Modern Slavery Act 2015.

Work is underway to create new tiered training packages to ensure all levels of professionals have appropriate training to respond to modern slavery.

Tackling radicalisation is a key priority for the CCSP. The Prevent Board oversees the delivery of Prevent across the partnership and ensures compliance with the Prevent Duty. Alongside Prevent sits the multi-agency Channel Case Management Panel, which focuses on early intervention by providing tailored support to individuals identified as susceptible to radicalisation.

The risk and threat of radicalisation are collated and assessed by West Midlands Police Counter Terrorism Intelligence Analysts. This intelligence is shared with the partnership, enabling a strategic, evidence-based approach to prioritising actions, supporting early intervention, and ensuring effective prevention measures, much like the strategic assessment process.

Prevent has delivered significant work across education, community groups, and professional development. This includes embedding clear referral pathways and offering advice to ensure that those at risk are identified and supported at the earliest opportunity. By providing training, raising awareness, and building resilience, Prevent helps to reduce risk, address threats at an early stage, and safeguard individuals and communities.

Preventing Exploitation and Protecting Victims of Crime (Summary of the Issues)

- Honour based abuse has decreased by 29% but is highly likely that these figures are under represented.
- Hate crime has marginally decreased this year (>1.0%).
- Racial hate crime was the top offence accounting for 80% of all hate crimes.
- There has been a 18.5% increase in county-line offences involving children under 18.
- Males aged 15-17 years old were involved in 68.8% of county line offences.
- Child Sexual Exploitation (CSE) has seen a 35.9% decrease.
- Modern slavery cases reported to West Midlands Police have seen a 51.3% decrease in modern slavery offences, however Coventry City Council have recorded 124 cases which has been steadily increasing.
- Within the cases of modern slavery, females fell victim to sexual exploitation across all ages. Females under 25 years old were seeing more criminal exploitation and over 25 years forced labour.
- Males fell victim to criminal exploitation (drugs) across all ages. Younger males (10-19 years) saw higher levels of gang affiliation. Focused labour was seen in victims over 20 years old.

What are partners telling us?

- They felt that the biggest priority should be dealing with vulnerable people in the city.
- The biggest challenges facing victims was the lack of faith in services and recognising themselves as victims of crime.
- Taking a trauma-informed approach, working in partnerships and making sure we were person-centred were important values to ensure that victims were supported.

How will we respond

We will train our professionals to recognise signs of exploitation and support other organisations in doing the same.

We will establish strong pathways for victims to access appropriate services.

We will consult with those with lived experience to design services that instill confidence in victims.

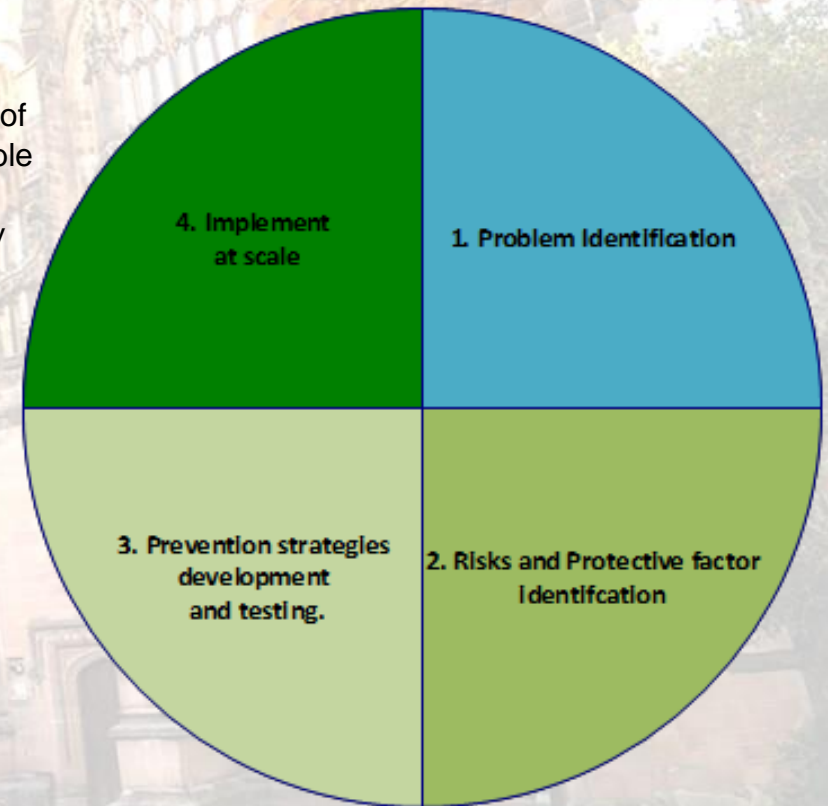
Trauma-informed practice and a person-centered approach will be central to our work.

Objective	How we plan to achieve this
Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.	<ul style="list-style-type: none"> ✓ Delivering a 3-tier training programme to frontline staff and professionals to increase the awareness of modern slavery. ✓ Development of age-appropriate educational resources for schools to reduce the risk of young people being exposed to radicalisation.
Reduce and increase awareness of the levels of hate crime	<ul style="list-style-type: none"> ✓ Undertake a review of the current hate crime strategy and establish if a new strategy is required. ✓ Continue to deliver training to professionals and communities to raise awareness of hate crime.
Increase the number of victims of exploitation, hate crime and other hidden harms accessing appropriate support	<ul style="list-style-type: none"> ✓ Create and implement effective pathways for victims of modern slavery. ✓ Creation of case management forums to identify victims of exploitation including victims of modern slavery, hate crime and other hidden harms. ✓ Create a Modern Slavery Strategy and embed the strategy through an appropriate action plan
Increase knowledge and understanding of the picture of exploitation and hidden harms.	<ul style="list-style-type: none"> ✓ Using data and information from lived experience groups to drive our commissioning of services and strategy work.

Approaches

A Public Health Approach

A Public Health approach focuses on understanding and addressing the root causes of violence rather than just responding to its symptoms. It treats violence as a preventable issue, much like a disease, and works to reduce it through early intervention, prevention, and long-term solutions. This approach involves analysing data to identify risk factors, engaging communities, and promoting collaboration between agencies to tackle the wider social and economic factors that contribute to violence.



4Ps – We will use the 4 P's approach to reduce violence, abuse and exploitation, protect victims and to take action against those who perpetrate crime

Prepare

Ensuring there are systems and processes in place to prevent incidents of crime

Prevent

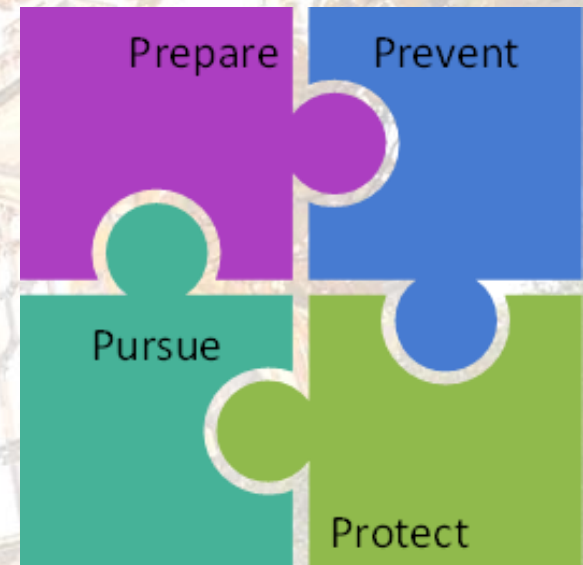
Preventing crime before it happens by raising awareness, educating the community and implement programmes and initiatives to prevent crime.

Protect

To provide support to safeguard those who have been victims of crime and are vulnerable to crime and exploitation.

Pursue

To take action against perpetrators of crime and hold offenders to account for their crimes.



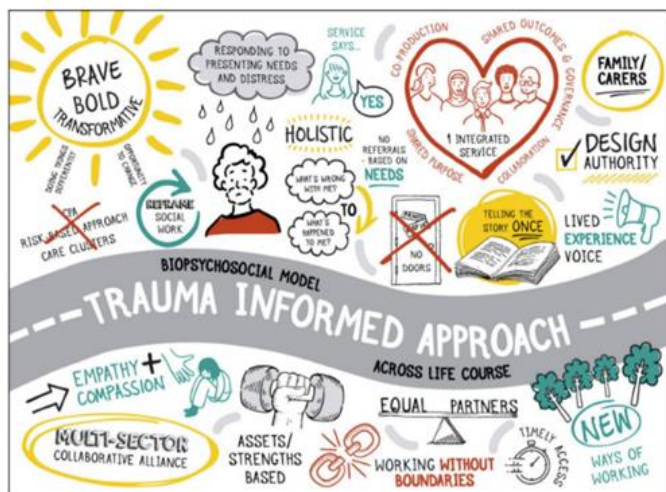
Trauma-Informed Approach

The Community Safety Partnership recognises the impact of trauma on individuals, groups, and communities.

It is important for us to improve the partnership's understanding of a trauma-informed approach.

To ensure that policies, strategies, and initiatives undertaken by the partnership consider trauma-informed principles.

we encourage trauma-informed training for professionals working within our partnership.



Monitoring and Measuring performance

The CCSP will convene on a quarterly basis. During these meetings, each subgroup will be required to report on the strategies they are accountable for. The CCSP will closely monitor the progress of these strategies to ensure that, as a partnership, we are effectively meeting the objectives outlined in the CCSP Plan.

Board	Objective	Strategy
Coventry Serious Violence Prevention Partnership	<p>Reducing levels of serious violence within the city year on year.</p> <p>Reducing the level of children entering the criminal justice system</p>	<ul style="list-style-type: none"> • Prevention of violence through the education system • Providing positive alternatives and targeted interventions for young people at risk of becoming involved in violence
Coventry Reducing Reoffenders Board	<p>Reducing levels of serious violence within the city year on year.</p> <p>Reducing the level of youth and adult reoffending.</p>	<ul style="list-style-type: none"> • Reviewing the support pathways associated with reoffending. • Understanding the unmet needs of vulnerable individuals not accessing treatment services • Exploring opportunities to take early intervention for diverting people away from the Criminal Justice System. • Reviewing the impact of neurodiversity on offending and reoffending. • Reviewing and monitoring the impact of the IOM.
Domestic Abuse Local Partnership Board	Reduce levels of serious violence within the city year on year.	<ul style="list-style-type: none"> • The use of enforcement of protective orders for Domestic Abuse cases. • Monitoring the number of Domestic Abuse offenders convictions. • Number of victims supported through the Criminal Justice system • Levels of Domestic Abuse Offenders subject to Drug testing in custody.

<p>Night Time Economy Streeting Group.</p>	<p>To create a safe and healthy night out in the city.</p>	<ul style="list-style-type: none"> • Achievement of purple flag • Creation of Evening and NTE Strategy • Monitoring initiatives for a safe and healthy night out.
<p>City Tasking</p>	<p>Reduce the yearly rates of ASB within the city by improving the partnership response to ASB in the city.</p> <p>Improve Community engagement with the residents of Coventry so that they have a great influence on policing and partnership priorities in the neighbourhood where they live.</p>	<ul style="list-style-type: none"> • Monitoring the use of PSPOs within the City • Monitoring the initiatives to be delivered in Hillfields. • Tackling of City Centre ASB • Reviewing the implementation of education and enforcement to reduce environmental ASB. • Levels of ASB reports and the successful crime outcomes • Levels of community engagement through PACT meetings.
<p>Harm Abuse Reduction Partnership</p>	<p>Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.</p> <p>Reduce and increase awareness of the levels of hate crime.</p> <p>Increase the number of victims of modern slavery, exploitation, hate crime and other hidden harms access appropriate support.</p> <p>Increase knowledge and understanding of the picture of exploitation and hidden harms.</p>	<ul style="list-style-type: none"> • The delivery of training initiatives for modern slavery and hate crime. • Monitoring of the current pathways for victims of Modern slavery. • Delivery of modern slavery strategy. • Review of current hate crime strategy.
<p>Prevent</p>	<p>Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.</p>	<ul style="list-style-type: none"> • Development of educational resources for schools to prevent radicalisation.
<p>CCSP wide</p>	<p>Reduce the levels of Serious Violence</p> <p>Reduce duplication of data production surrounding crime and ASB.</p>	<ul style="list-style-type: none"> • Reviewing the requirement of the “Duty of Collaborate” . • Reviewing how a single data product can be used to give a better holistic view of the current levels of crime and ASB across the City.

CCSP - Plan on a Page

Theme

Priorities

How do we measure success?

Reduction of Offending, Re-Offending and Serious Violence

- Reduce the level of serious violence within the city year on year.
- Reduce the level of children entering the Criminal Justice System.
- Reduce the levels of youth and adult offending and reoffending.
- Reduce duplication of data production surrounding crime and ASB.

- Reductions in levels of Serious violence.
- Reduction in re-offending and first-time entrants in the CJS.
- improved data production within the partnership.

Public Places Safety and Reassurance

- To create a safe and healthy night out within the city centre.
- Reduce the yearly rates of ASB within the city by improving the partnership response to ASB in the city.
- Improve community engagement with the residents of Coventry so that they have a great influence on policing and partnership priorities in the neighbourhood where they live.

- Overall reduction in ASB and Crime in the city centre.
- Improved reporting of ASB and satisfaction of outcomes
- An increase in successful partnership approaches to community issues.

Tackling Exploitation and protecting victims of crime.

- Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.
- Reduce and increase awareness of the levels of hate crime.
- Increase the number of victims of modern slavery, exploitation, hate crime and other hidden harms access appropriate support.
- Increase knowledge and understanding of the picture of exploitation and hidden harms.

- Increased reporting hidden crimes. (modern slavery, hate crime, radicalisation)
- Reductions in repeat victims
- Increased victim satisfaction.
- Improved community confidence and satisfaction.

CCSP - Plan on a Page

Theme

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- Reductions in repeat victims
- Increased victim satisfaction.
- Improved community confidence and satisfaction.

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Equality Impact Assessment

EIA-687574919 - Coventry Community Safety Partnership Plan

Details

Title	Coventry Community Safety Partnership Plan
Author	Joy Adams (CCTV and Community Safety Manager)
Head of Service	Adrian Chowns (Head of Housing and Safer Communities)
Cabinet Member	Cllr A Khan (Policing and Equalities)

Context and background

EIA carried out on	New policy or strategy
Background	<p>Community Safety Partnerships (CSPs) are the statutory body that brings together local partners to solve shared issues around Crime and Disorder, Anti-Social Behaviour, Drug and Alcohol misuse, and Reoffending.</p> <p>Every three years Community Safety Partnerships are required to develop an overarching Community Safety Partnership Plan under the Crime and Disorder Act 1998. The plan provides an overview of the work and priority areas that fall under the responsibility of the Coventry Community Safety Partnership (CCSP).</p> <p>In advance of the plan, the CCSP will be using information from the Strategic Assessment. The Strategic Assessment is created on behalf of the CCSP, by West Midlands Police Partnership Intelligence Liaison Team. It provides an analysis of the level and patterns of crime and disorder in the City over the last 12 months.</p> <p>A public consultation was undertaken to ask members of the public and key stakeholders on their views on community safety in the city, in its widest sense.</p>

Stakeholders

- Coventry City Council (Regulatory Services, Public Health, Youth offending Services)
- West Midlands Police
- West Midlands Fire and Rescue Authority
- West Midlands Probation Services
- Coventry and Warwickshire Integrated Care Board

Other stakeholders include :-

- Citizen Housing
- Community Representatives

Responsibility

The Coventry Community Safety Partnership will be responsible for implementing the findings of the EIA.

The “Responsible Authorities” within the CSP are:-

- Coventry City Council (Regulatory Services, Public Health, Youth Offending Services)
- West Midlands Police
- West Midlands Fire and Rescue Authority
- West Midlands Probation Services
- Coventry and Warwickshire Integrated Care Board

Other stakeholders include :-

- Citizen Housing

Consideration of impact

Baseline data and information

The information from the strategic assessment was used to form the Plan. This information has been shared with the EIA team.

Protected groups

Age 0-18

Positive impact - The priorities in the plan supports work preventing children entering the Criminal Justice System.

The priorities support children being targeted for criminal exploitation.

The priorities support victims of crime.

Positive impact - The plans objectives have a positive impact on this group. These objectives have a positive impact on people ages between 19-64

Age 19-64

- Reduce the level of serious violence within the city year on year.
- Reduce the levels of adult reoffending.
- Reduce duplication of data production surrounding crime and ASB.
- To create a safe and healthy night out within the city centre.
- Reduce the yearly rates of ASB within the city by improving the partnership response to ASB in the city.
- Improve community engagement with the residents of Coventry so that they greatly influence policing and partnership priorities in their neighbourhood.
- Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.
- Reduce and increase awareness of the levels of hate crime.
- Increase the number of victims of modern slavery, exploitation, hate crime and other hidden harms access appropriate support.
- Increase knowledge and understanding of the picture of exploitation and hidden harms.

When monitoring these plans the crime data is broken down to age category.

Positive impact -

The Coventry Community Safety Partnership Plan has the following objectives.

These support the age 65+ in a positive way.

Age 65+

- Reduce the level of serious violence within the city year on year.
- Reduce the levels of adult reoffending.
- To create a safe and healthy night out within the city centre.
- Reduce the yearly rates of ASB within the city by improving the partnership response to ASB in the city.
- Improve community engagement with the residents of Coventry so that they greatly influence policing and partnership priorities in their neighbourhood.
- Reduce the prevalence and increase awareness of modern slavery, radicalisation, exploitation and other hidden harms.
- Reduce and increase awareness of the levels of hate crime.
- Increase the number of victims of modern slavery, exploitation, hate crime and other hidden harms access appropriate support.
- Increase knowledge and understanding of the picture of exploitation and hidden harms.

When monitoring these plans the crime data is broken down to age category.

<p>Disability</p>	<p>Positive impact - Disability falls under the remit of hate crime.</p> <ul style="list-style-type: none"> •The priorities aim to reduce and increase the awareness of hate crime. •The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation. •The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.
<p>Gender reassignment</p>	<p>Positive impact - Gender reassignment falls under the remit of hate crime.</p> <ul style="list-style-type: none"> •The priorities aim to reduce and increase the awareness of hate crime. •The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation. •The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.
<p>Pregnancy and maternity</p>	<p>No impact -</p>
<p>Race</p>	<p>Positive impact - racial discrimination falls under the remit of hate crime.</p> <ul style="list-style-type: none"> •The priorities aim to reduce and increase the awareness of hate crime. •The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation. •The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.
<p>Religion and belief</p>	<p>Positive impact - religious discrimination falls under the remit of hate crime.</p> <ul style="list-style-type: none"> •The priorities aim to reduce and increase the awareness of hate crime. •The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation. •The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.

Sex

Positive impact - gender discrimination falls under a hate crime.

- The priorities aim to reduce and increase the awareness of hate crime.
- The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation.
- The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.
- The plans promote the prevention of violence against women and girls.

Sexual orientation

Positive impact - sexual orientation discrimination falls under the remit of hate crime.

- The priorities aim to reduce and increase the awareness of hate crime.
- The plans also plan to increase the numbers of victims who are accessing support who are more likely to be targeted for exploitation.
- The plan aims to increase the knowledge and understand the picture of exploitation and hidden harms.

Care experienced

Positive impact - There is evidence to link young people in the care system are more likely to be subject to criminal exploitation. The plan will have a positive impact as it aims to reduce exploitation through educating young people and making them more resilient to exploitation. The plan also aims to reduce serious youth violence.

https://exposure.org.uk/young_peoples_work/is-this-justice-care-experienced-young-people-over-criminalised/

<https://www.ons.gov.uk/peoplepopulationandcommunity/educationandchildcare/articles/theeducationbackgroundoflookedafterchildrenwho interactwiththecriminaljusticesystem/december2022>

Health inequalities (HI)

<p>How HI will be reduced</p>	<p>The Community Safety Partnership Plan impacts on the Marmot principles in the following way</p> <p>The Plan aims to reduce children entering the Criminal Justice System and aims to prevent children being criminally exploited. By doing this it is ensuring that they have the best start in life.</p> <p>The plan has an impact of reducing hate crime. This meets with the Marmot principles.</p> <p>The plan aims to support victims from exploitation and hidden harms. This targets issues such as modern slavery.</p> <p>This supports the principles of enabling all children, young people, and adults to maximise their capabilities and have control over their lives and creating fair employment and good work for all</p>
<p>Evidence showing how HI will be reduced</p>	<p>The information from our strategic assessment and the monitoring data of the plan will show evidence of the numbers of victims accessing support and crime exploitation data such as levels of modern slavery.</p>
<p>Groups of people who face HI</p>	<p>vulnerable adults with limited access to support. women and girls vulnerable to crime and exploitation Young people who are likely to be targeted for criminal exploitation. adults who are leaving the criminal justice system are likely to reoffend.</p> <p>The plan aims to ensure that there are education programme in place in schools to prevent children exploitation. The aim aims to provide alternative services to divert young people to entering the criminal justice system</p> <p>The plans aim to ensure that victims are supported and protected from exploitation , The plans aim to provide a safe and health night out and to reduce the chance of violence in the night time economy. The plans aim to ensure their is appropriate pathway support to ensure people leaving the criminal justice service are less likely to reoffend. The plans aim to ensure professionals have the correct referral pathways to ensure victims are supported and protected from exploitation.</p>

How to improve HI for groups identified

The plan aims to ensure that there are education programme in place in schools to prevent children exploitation.
 The aim aims to provide alternative services to divert young people to entering the criminal justice system
 The plans aim to ensure that victims are supported and protected from exploitation ,
 The plans aim to provide a safe and health night out and to reduce the chance of violence in the night time economy.
 The plans aim to ensure their is appropriate pathway support to ensure people leaving the criminal justice service are less likely to reoffend.
 The plans aim to ensure professionals have the correct referral pathways to ensure victims are supported and protected from exploitation.

Digital inequalities (DI)

Impact to DI

- Digital exclusion can be a major barrier to employment (mentioned above).
 - Radicalisation and exploitation (mentioned above), can take place online - could increasing good digital literacy skills help, to combat misinformation and equip people with tools to make their own decisions rather than being potentially radicalised/exploited?

Opportunities to reduce DI

The plan will improve pathway referrals for partners through training and awareness raising.

Next steps

Inequality	Action	Owner	Timescale

Monitor and evaluation

The Coventry Community Safety Partnership Plan will be monitored by the CCSP on a quarterly basis.

**Will there be an
impact?** No

Completion statement

**Potential equality
impact** Positive impact has been identified for one or more protected
groups



Cabinet

18 March 2025

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change – Councillor J O’Boyle

Director Approving Submission of the report:

Director of Regeneration & Economy

Ward(s) affected:

All

Title:

Coventry & Warwickshire Economic Strategy

Is this a key decision?

Yes – as it is significant in terms of its effect on communities living or working in an area comprising two or more wards or electoral divisions in the area of the city

Executive Summary:

Following the closure of Coventry and Warwickshire Local Enterprise Partnership (CWLEP) in 2023, it was agreed by both Coventry City Council and Warwickshire County Council that the economic function of the subregion remained a key priority. It was also agreed that the area needed a new economic strategy that aligned with broader national economic policies and enabled local challenges and opportunities to be tackled in a focused and co-ordinated manner.

In 2023, Warwickshire County Council, working with Coventry City Council and other sub-regional economic partners, commissioned SQW (an independent economic development consultancy) to produce the new Economic Strategy for Coventry & Warwickshire. The commission included economic forecasting work to develop a fresh baseline and scenarios to better understand the area’s economic growth potential, and by the creation of the Economic Strategy and Action Plan.

The development of the strategy has been informed by the evidence base and a consultation process, which featured discussions with the area’s Local Authorities, local business bodies and round tables with a range of local businesses. Stemming from the evidence base and consultation process, a 10-year vision (2024 – 2034) has been proposed to frame the Coventry & Warwickshire Economic Strategy:

“Coventry & Warwickshire will be recognised for the role of its innovation focused knowledge economy, particularly in nurturing creativity, harnessing digital possibilities and solutions, enabling future mobility, and unlocking the potential of electrification. This will be achieved through major research-intensive businesses and universities/ institutions, but also through the dynamism and effectiveness of a rich but varied innovation ecosystem in which creativity flourishes and new businesses are formed, nurtured and grown. Over the next decade, Coventry & Warwickshire will see economic transformation and growth, through new skills and competencies, and through a process of economic restructuring (especially as established businesses/sectors pivot in response to regulatory and technological change). As a result, the whole area will be known around the world for its economic vibrancy, founded on creativity and innovation. The productivity of the local economy will also have grown. The benefits will be enjoyed by all who live and work in Coventry & Warwickshire, and inequalities between people, communities and places will be much reduced”.

Building on this vision, the strategy and action plan is based around five themes and outcomes that will facilitate diversification of the economy through innovation (especially key sectors such as Electric Vehicles & Batteries and CreaTech, building on the area’s knowledge base assets), attract new investment, create new job opportunities for local people through increasing the number of high growth and scale up businesses and securing new investment, and realise major strategic infrastructure enhancements and capital projects notably the CW Gigapark Investment Zone site and developments at Ansty and the University of Warwick. The strategy helps to support the work of the Coventry and Warwickshire LVEP which is looking at several strategic objectives around the visitor economy. They are examining areas where efficiencies can be driven and opportunities to showcase the profile of the two LA areas to attract new visitors, events, and conferences, working closely with the West Midlands and Visit England.

The cost of producing this Strategy was met by Warwickshire County Council, with Coventry City Council’s contribution being in-kind only. Although there will be no funding coming in directly as a result of the Strategy, it will create the framework for shaping major business support, sector development and economic growth activities covering the full Coventry & Warwickshire area. It will also give local businesses a voice in shaping major future economic development and business support programmes.

Recommendations:

The Cabinet is asked to:

- 1) Approve the adoption of the Coventry & Warwickshire Economic Strategy (2024-2034).
- 2) Delegate authority to the Director of Regeneration & Economy, following consultation with the Director of Law and Governance, the Director of Finance and Resources and the Cabinet Member for Jobs Regeneration and Climate Change, to further amend edit and adapt the Coventry & Warwickshire Economic Strategy in the future in response to subsequent review, opportunity and consultation as required.

- 3) Agree for a Round Table to be hosted in partnership with Coventry & Warwickshire Chamber of Commerce and local businesses to identify how to deliver the activities in the Strategy, and to get further detail on the types of support services local businesses will need to realise their growth ambitions.

List of Appendices included:

Appendix 1 - Coventry & Warwickshire Economic Strategy

Background papers:

None

Other useful documents

Coventry Economic Development [Strategy](#) 2022-2027

West Midlands Combined Authority [Plan for Growth](#)

Has it been or will it be considered by Scrutiny?

Yes - A progress report will be added to the work programme of the Business, Economy and Enterprise Scrutiny Board (3), for a date during the 2025/26 Municipal Year

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

Coventry & Warwickshire Economic Strategy (2024-2034)

1. Context and Background

- 1.1 Coventry & Warwickshire, known for its rich history in manufacturing and innovation, continues to face numerous economic challenges and opportunities. To ensure that the local functional economic area can address these effectively and in a co-ordinated manner with full stakeholder buy-in, a cohesive and comprehensive economic strategy is essential.
- 1.2 Following the closure of Coventry & Warwickshire Local Enterprise Partnership (CWLEP), it was agreed by both Coventry City Council and Warwickshire County Council that the economic functionality of the sub-region remained a key priority and needed an economic strategy that aligned with broader national economic policies while focusing on local strengths and addressing specific regional issues.
- 1.3 After a tender process in 2023, SQW (an independent economic development consultancy) was selected to carry out this commission, with Coventry City Council and Warwickshire County Council working closely with SQW to guide the process. The cost of producing this Strategy was met by Warwickshire County Council, with Coventry City Council's contribution being in-kind only. The commission comprised two aspects – firstly economic forecasting work that developed a fresh baseline and different growth scenarios to understand the economic growth potential of the area, and secondly the creation of the new Economic Strategy for Coventry & Warwickshire. The Strategy includes a vision, strategic objectives and priorities for action, and a related action plan.
- 1.4 The development of the vision, strategic objectives and action plan has been informed by the evidence base, as well as an extensive consultation process. The consultations featured discussions with the area's Local Authorities and as local business bodies, such as the Coventry & Warwickshire Chamber of Commerce, and the Coventry & Warwickshire Growth Hub. A critical aspect of the consultation process was engagement with a wide range of local businesses, which included a series of one-to-one consultations to establish the key challenges local businesses were facing and where they saw potential opportunities.
- 1.5 The evidence base showed that between 2008/09 and 2016/17, Coventry & Warwickshire was the fastest growing local economy in the country. However, growth of the local economy has slowed in recent years, relative to national trends. Analysis from The Scale-Up Institute has also identified that Coventry & Warwickshire has the second lowest concentration of high growth businesses of all local economies. More therefore needs to be done to accelerate economic and business growth in the area.
- 1.6 The economic forecasts produced for the strategy expect economic output (measured by Gross Value Added – GVA) to grow by 2.9% per annum between 2022 and 2032, before slowing slightly in the following decade. The economic forecasts also project employment growth of 0.7% per annum between 2022 and 2032, and 0.8% per annum over the following decade – significantly lower than the employment growth rates witnessed between 2012 and 2022.

- 1.7 The Strategy highlights that Coventry & Warwickshire is structurally vulnerable to the full implications of decarbonisation and shift away from fossil fuels, with the transition to electrification likely to result in winners and losers – this presents both challenges and opportunities. It also highlights a need to address the skills gaps to facilitate successful economic restructuring and ensure that local skills provision keeps pace with employers' ever-changing requirements.
- 1.8 The Strategy identifies the need to build on the strong local assets that could help deliver economic prosperity economic prosperity, notably the strong innovation and knowledge base, led by two highly acclaimed universities. It also highlights the need to build on Coventry & Warwickshire's thriving advanced manufacturing and gaming sectors, and rapidly growing cultural and creative sectors and strong tourism offer. Coventry & Warwickshire's central location, strong road and rail links and good connectivity also makes the area attractive for new investment, especially with the onset of a digital revolution brought about by automation and artificial intelligence.
- 1.9 The Strategy is driven by a vision for Coventry & Warwickshire for the decade ahead:

Coventry & Warwickshire will be recognised for the role of its innovation focused knowledge economy, particularly in nurturing creativity, harnessing digital possibilities and solutions, enabling future mobility, and unlocking the potential of electrification. This will be achieved through major research-intensive businesses and universities/institutions, but also through the dynamism and effectiveness of a rich but varied innovation ecosystem in which creativity flourishes and new businesses are formed, nurtured and grown. Over the next decade, Coventry & Warwickshire will see economic transformation and growth, through new skills and competencies, and through a process of economic restructuring (especially as established businesses/sectors pivot in response to regulatory and technological change). As a result, the whole area will be known around the world for its economic vibrancy, founded on creativity and innovation. The productivity of the local economy will also have grown. The benefits will be enjoyed by all who live and work in Coventry & Warwickshire, and inequalities between people, communities and places will be much reduced.

- 1.10 Building on this Vision, the Strategy and action plan are focused around five key themes:
 - **Theme 1: Responding to Economic Change** – ensuring the area supports and nurtures its economic assets through a period of significant economic and industrial change (including autonomy, automation and the growth of artificial intelligence), and that key economic sectors transition successfully (notably the electrification of the automotive and aerospace industries).
 - **Theme 2: Creativity and Innovation** – encouraging creativity and innovation across all sectors of the economy, with knowledge exchange as a key driver.
 - **Theme 3: The Scale-Up Journey** – identifying and addressing the systematic barriers to businesses scaling-up. This theme particularly seeks to unlock the

growth potential of the creative entrepreneurship and start-up businesses that exist in the area.

- **Theme 4: International Profile** – this theme is concerned with Coventry & Warwickshire’s ‘place in the world’. It stresses the need to raise the area’s international profile, notably by building on the world-class assets and sectoral specialisms currently within the area. It also focuses on supporting local businesses to trade internationally and growing the international visitor economy.
- **Theme 5: Strategic Infrastructure and Major Projects** – this theme is concerned with the necessity to support economic growth by putting in place the requisite infrastructure, including transport, energy, water, and employment space, and build on infrastructure investments that are currently progressing.

1.11 The five themes are strongly inter-related and have been identified to:

- provide flexibility and agility in the context of risk and uncertainty (politically, economically, institutionally)
- make it clear what Coventry and Warwickshire needs to ‘do’ (given the area’s assets, opportunities, and challenges)
- be appropriate at a sub-national scale (given the raft of strategies and plans at both larger and smaller spatial scales)
- allow real progress to be made in pursuit of an overall Vision.

1.12 Ultimately, the Strategy is seeking to realise five key outcomes for Coventry & Warwickshire:

- **Economic Resilience:** A diversified and robust local economy capable of withstanding external shocks.
- **Job Creation:** Increased employment opportunities, particularly in high-growth sectors.
- **Skills Development:** A highly skilled workforce equipped for future challenges.
- **Improved Infrastructure:** Enhanced connectivity and modern infrastructure supporting economic activities.
- **Inclusive Prosperity:** Equitable economic growth benefiting all communities within the region.

1.13 The Coventry & Warwickshire Economic Strategy has been designed to complement the City Council’s existing strategies, such as the One Coventry Plan (notably the Economic Prosperity Pillar) and Economic Development Strategy. The Strategy seeks to raise current and future aspirations and opportunities on the national and international stage. It also places a strong emphasis on delivering inclusive economic growth, raised living standards for everyone, and for inequalities to be tackled.

1.14 This Strategy will also aim to complement, support and influence Coventry City Council’s future strategies, policies and planning decisions, including any future potential Local Plan review, although it should be noted that in relation to planning

decisions, this Strategy will be treated as a material consideration but will have limited weight until any Local Plan review is completed.

- 1.15 The Strategy proposes a range of performance indicators to measure its impact on the sub-region. These include key baseline economic indicators that have benchmarked Coventry & Warwickshire's performance, both over time and against other regions of the country. These include (but not limited to) GVA, employment levels, economic inactivity, claimant count and qualification levels. Coventry City Council, Warwickshire County Council and key local partners will therefore need to track published data and collate additional information to monitor changes in the area's economic performance and understand how much local residents are benefiting from future economic growth.
- 1.16 The delivery of the Strategy will rely on maintaining and developing strong working relationships with partners, such as local universities and colleges, and local business bodies (including but not limited to Coventry & Warwickshire Chamber of Commerce and the Coventry & Warwickshire Growth Hub). It will also require strong engagement with WMCA, neighbouring Local Authorities and national government to influence the focus of future regional and national level policies, regional funding settlements and national funding streams (the National Wealth Fund being one key example, given that gigafactories and green technologies are named as priority areas of focus). There is a strong track record of joint working between Coventry City Council and Warwickshire County Council across employment, economy, infrastructure, and investment, and successful delivery of this strategy will rely on the continuation of this relationship.
- 1.17 Coventry City Council and Warwickshire County Council are in positive dialogue with Coventry and Warwickshire Chamber of Commerce about their emerging manifesto on economic growth and productivity and how our Strategy can be the foundation for this manifesto in setting the context and aspirations of the area. Once this Strategy is politically endorsed, the intention is to create a vehicle to ensure the local business voice is heard and understood, especially on barriers to growth, to then help shape the ongoing implementation of this Strategy.
- 1.18 Although there are no specific funds attached to this endeavour, the Coventry & Warwickshire Economic Strategy will be an important tool in both making the case for new funding for the sub-region and also ensuring that we carefully target future funds to realise optimal economic benefit.

2 Options Considered and Recommended Proposal

- 2.1 **Option 1 (Not recommended).** The Council could choose not to have a Coventry & Warwickshire Economic Strategy, and to instead rely on strategic plans of the WMCA, such as the Plan for Growth, as well as Coventry City Council and Warwickshire County Council's individual Economic Development Strategies. The risk with this approach is that there would be no joined up strategy that addresses economic needs and opportunities that cover the full Coventry & Warwickshire sub-region, reflects the functional economic area, and reflects the geographical focus of key business representative bodies such as the Growth Hub, Chamber of Commerce and Federation of Small Businesses. Following the closure of the

Coventry & Warwickshire Local Enterprise Partnership in 2023, there would also be no clear means of the private sector being able to shape economic planning and major business support and economic development activities at the sub-regional scale.

- 2.2 **Option 2.** The endorsement of the Coventry & Warwickshire Economic Strategy that charts a course of economic prosperity for the sub-region. It is aimed at fostering economic growth, improving regional competitiveness, and enhancing the quality of life for residents within the Coventry and Warwickshire area. It has been developed in response to key policy papers while ensuring it captures the unique and local context of Coventry & Warwickshire economy. It has been shaped through extensive engagements with partners, stakeholders, and representatives from both the private and public sectors. By leveraging local strengths and addressing key challenges, the Strategy aims to create a vibrant, resilient, and competitive economy that benefits across the area.
- 2.3 It is recommended that the Cabinet supports Option 2 and endorses the Coventry & Warwickshire Economic Strategy (2024-2034).

3 Results of Consultation Undertaken

- 3.1 The development of the Strategy has been informed by a consultation process primarily with business and stakeholders involved in economic growth between January and June 2024, which consisted of:
- Ten one-to-one consultations with stakeholders, including local universities, business representative organisations, and wider regional stakeholders.
 - Ten one-to-one consultations with businesses identified by CCC and WCC.
 - A roundtable event attended by 14 business and business representative organisations.
 - A follow-up roundtable event attended by seven business and business representative organisations.
- 3.2 The purpose of the consultations was to understand more about the current economic and business environment in Coventry & Warwickshire, and some of the relative strengths and weaknesses of the area. They also sought to investigate how labour markets are functioning in the post-pandemic era, and what effect this was having on businesses and the wider economy. The consultations also sought to consider how the transition to net zero is affecting local businesses. As well as evaluating the current state of the economy, the goal of the consultations was to identify future opportunities, barriers and threats.
- 3.3 The consultations gathered a significant level of intelligence about Coventry & Warwickshire, from which several conclusions were made that are reflected in the Strategy:
- Broad consensus of the importance of the Coventry & Warwickshire functional geography, and the need to promote it.
 - The lack of labour with the correct skills being a challenge for businesses, and skills provided locally do not always match the need.

- The lack of ‘stability’, both nationally and locally, has had a negative effect on business confidence, meaning that businesses are increasingly making short-term decisions on investment, rather than long-term commitments.
- Businesses feeling increasingly confused at the complex political and funding landscape, the relationships between existing and new entities, and how these tie together.
- Ongoing concerns over the disjointed nature of business support and approaches to inward investment.
- Too many businesses do not know what they need or how to access available access to finance and investment readiness support.
- Ongoing infrastructure constraints are restricting investment, including energy, transport, and land availability.
- Those businesses not able to offer ‘hybrid’ working (i.e. splitting time between working at home and in an office) feeling at a disadvantage in recruiting staff.
- The need for better linkages between higher / further education and industry.
- The need to learn from other successful places / functional economies / geographies outside of the West Midlands.

4 Timetable for Implementing This Decision

- 4.1 The Coventry & Warwickshire Economic Strategy (2024-2034) is a ten-year strategy. Progress and will be reported annually to the relevant Cabinet Member (Jobs, Regeneration & Climate Change).

5 Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1 Financial implications

5.1.1 Although there will be no funding coming in directly off the back of this exercise, the Strategy will create the framework for shaping major business support, sector development and economic growth activities that need to cover the full Coventry & Warwickshire area. It will also give local businesses a voice in shaping major future economic development and business support programmes covering the sub-region. The Strategy could also help to influence future government funds, notably by emphasising key activities that have been successful at the Coventry & Warwickshire scale, including the Coventry & Warwickshire Immersive & Creative Launchpad, which has received £7.5m of funding from Innovate UK to help grow the region’s Creative Technologies (CreaTech) cluster. All of this will be crucial in light of the Small Business Strategy and new national Business Growth Service, which are expected to be launched in the first half of 2025.

5.1.2 By emphasising the strengths of the Coventry & Warwickshire functional geography, this Strategy could be an important tool in positioning the area to bid for future schemes that need to be delivered at the Coventry & Warwickshire level. One example of this is the Coventry & Warwick Gigapark, which encompasses both Coventry and Warwickshire Local Authority areas, providing potential economic benefits at a sub-regional scale. With Coventry being part of the WMCA and the new government’s plans to devolve more powers to regional mayors through

integrated settlements, it is important that there remains a voice for the significance of the Coventry & Warwickshire functional economy, and that it must continue to be recognised as such.

5.2 Legal Implications

5.2.1 There are no direct legal implications arising out of this report at this stage, save for noting the Council's duty under the Equality Act 2010.

5.2.2 Whilst there is no statutory duty to produce a Coventry & Warwickshire Economic Strategy, doing so provides an important framework for helping to deliver the Council's statutory obligations and will help drive forward the One Coventry Plan 2022-2030. The Coventry & Warwickshire Economic Strategy (2024-2034) will sit alongside other Council policies and strategies (not least the Coventry Economic Development Strategy 2022-2027) and will provide a clear and achievable economic vision for the Coventry & Warwickshire sub-region, therefore underpinning and reinforcing the Council's aims and objectives.

5.2.3 The Equality Act 2010 requires public authorities to have regard to the need to eliminate discrimination and advance equality of opportunity. The Council must further take into account its wider Public Sector Equality Duty (PSED) under s. 149 of the Equality Act 2010 when making its decisions. The public sector equality duty (s.49, Equality Act 2010) requires the Council when exercising its functions, to have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act, advance equality of opportunity between those who share a 'protected characteristic' and those who do not share the protected characteristic and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice and (b) promote understanding). As such, Diversity, Equality and Inclusion has been identified as a cross-cutting theme within the Strategy.

5.2.4 The Council will consider the impact of any projects or changes to service delivery that might arise as a result of implementing work coming out of this Strategy on those protected equality characteristics. Individual projects or proposals that come forward as a result of this Strategy are likely be subject to an Equality Impact Assessment (wherever relevant) prior to any decision taken to proceed, including the identification of mitigating action, where possible.

6 Other implications

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

6.1.1 The Coventry & Warwickshire Economic Strategy will help to deliver the five objectives within the One Coventry Plan.

6.1.2 **Increasing the Economic Prosperity of the City and Region.** This Strategy will contribute heavily towards delivering this objective, not least because creating a

strong and resilient economy underpins the Economic Development Strategy's objectives and key deliverables. The Strategy will provide the strongest possible enabling framework for local businesses to prosper, (notably through providing the support ecosystem and infrastructure for more businesses to grow rapidly and invest in innovation), for good quality jobs to be protected, for new domestic and international investment to come into Coventry, for new good quality jobs and training opportunities to be created, and for growth of key sectors of the sub-regional economy to be accelerated.

6.1.3 Improving Outcomes and Tackling Inequalities Within our Communities.

Aligned to the Strategy's focus of creating new good jobs and training opportunities, we will use the local business support and employment and skills support ecosystem (notably the Job Shop Hub & Spoke Model) to ensure that residents from all parts of Coventry are able to access growth opportunities, and more local businesses are able to access new supply opportunities. This will help to improve the standard of living of Coventry's residents and tackle longstanding inequalities.

6.1.4 Tackle the Causes and Consequences of Climate Change. The Strategy recognises the need to address the causes and consequences of climate change, and the challenges and opportunities that presents. It highlights the changing nature of industry, with the rapid take-up of new, low carbon technologies and how vital it is that the West Midlands continues to play a pivotal role in that transition. It advises on growing the 'green' sectors of our local economy and also emphasises the need to deliver green infrastructure, such as clean renewable energy.

6.1.5 Continued Financial Sustainability of the Council. The Strategy provides a framework that will enable businesses across a wide range of sectors to accelerate their growth and for local residents to improve their standard of living. All of this should help to support the financial sustainability of the Council by providing income generation opportunities, not least through business rates and Council tax revenues.

6.1.6 Council's Role as a Partner, Leader and Enabler. Partnership working is integral to the delivery of all elements of this Strategy. As such, the Council will have a vital role to play in facilitating strong partnerships with other local economic development and business representative bodies, and also acting as an important partner to regional and national organisations in designing and delivering priority actions.

6.2 How is Risk Being Managed?

6.2.1 One of the key risks for successful delivery of this Strategy will be the ability of Coventry City Council, Warwickshire County Council and key partners to secure sufficient funds to deliver priority activities and projects highlighted within the strategy. The City Council has a strong track record of securing funds, as well as managing risks and maintaining significant financial controls and well-established procedures when handling public funds. The key risks associated with the Strategy, and how they will be managed include:

- **Economic uncertainty.** With the UK having emerged from a recession in late 2023 and slow growth prevailing during 2024, the Council will need to act flexibly and be able to adapt projects and services to support businesses, and

deliver the necessary infrastructure schemes, through both times of economic contraction and times of economic recovery and expansion.

- **The changing public funding environment.** Since the UK has been no longer able to access EU Structural Funds, the way many business, skills and employment support activities will be funded in Coventry and other areas of the UK has changed regularly, with many economic development funds having been lower in value and shorter in timescales as a result. Coventry City Council and other Local Authorities have needed to be increasingly proactive in responding to these changes through identifying more innovative and flexible ways of funding priorities (and using external partners where they add value) and further strengthening partnership approaches to delivery.
- **Securing commitment of partners to work jointly on delivery of the Strategy.** Both local public and private sector stakeholders have responded very positively to the Strategy, and we envisage that already strong partnership working arrangements across Coventry & Warwickshire will be enhanced in delivering the strategy.

6.3 What is the Impact on the Organisation?

6.3.1 The implications of this Strategy in terms of there being no direct funding attached has been covered in Section 5.1. Staff from the Regeneration & Economy Division will need to work effectively with other public and private sector organisations to roll out the strategy and design interventions to fulfil its objectives. In respect of the wider Council, the Strategy will have wide-reaching positive impacts on the residents of Coventry, including the growth of local businesses, creation of new jobs, and improvements to health and wellbeing. All of this should reduce reliance on Council welfare services (thereby mitigating against risks of the need to find extra financial resources for additional staff) and have public health benefits.

6.3.2 The staff impact within the Strategy is positive. Any matters arising that impact staff as the Strategy progresses will be dealt with in accordance with the appropriate policies that relate to specific matters arising.

6.4 Equalities/EIA?

6.4.1 One of the key aspirations of the Coventry & Warwickshire Economic Strategy is to realise areas of untapped potential, and to have a positive impact on people who are identified as more vulnerable in terms of economic wellbeing and gaining sustainable employment. Initiatives, projects and programmes will be tailored to meet those vulnerable groups. Data is regularly collected and analysed to ensure continuous improvement and effective identification of the most vulnerable groups and areas both within Coventry and more widely in Warwickshire.

6.4.2 In ensuring that Equality and Diversity is integrated into all elements of Strategy design, a widespread consultation process took place to inform the content of the Strategy, which included twenty one-to-one consultations, and two roundtable events, which were attended by businesses of a differing sizes and from a range of

sectors. The area's Local Authorities, universities, and business representative organisations and wider regional stakeholders also fed into this process.

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

As detailed above, the Strategy will have positive impacts on climate change and the environment and will be one of the most important strategies in achieving the One Coventry Plan's objective of "Tackling the Causes and Consequences of Climate Change". This strategy will also be strongly aligned with the new Coventry Climate Change Strategy. It also emphasises the importance of growing the 'green' economy in Coventry and Warwickshire, especially in the face of radical industrial change as energy-intensive industries seek lower cost, lower emission alternatives, such as electrification and hydrogen power. This will inevitably present opportunities for job creation, but it is vital that we have the skills here in this region to fill them. And for these businesses in the green economy to prosper it's critical that we provide for them the necessary infrastructure, such as clean renewable energy.

6.6 Implications for Partner Organisations?

The Strategy will be delivered in partnership with stakeholders across the city, sub-region and West Midlands region. It is a strategy that the Council cannot deliver on its own. Engagement with Warwickshire County Council and other local, regional and national public and private sector partners to align programmes, investments and collaboration on key projects and services will be required if we are to see its successful implementation. In many cases, it will involve the Council enhancing what are already strong partnerships.

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Appendix 1 - Coventry & Warwickshire Economic Strategy (2024 – 2034)



Coventry & Warwickshire Economic Strategy

December 2024

Final draft Final

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Executive Summary

1: Introduction

This document sets out a new **Economic Strategy for Coventry & Warwickshire**. It has been developed by **Warwickshire County Council and Coventry City Council** – not because government requires it but because the two upper tier local authorities believe that Coventry & Warwickshire has a **pivotal role to play at a sub-national scale that continues to be very important**. The purpose of the strategy is to **chart a course for one of the UK's most significant sub-national economies over the next decade**.

Coventry & Warwickshire can contribute much to the government's growth agenda. There is also a very strong read-across to the **Modern Industrial Strategy Green Paper**, which was published as this document was nearing completion.

2: Coventry & Warwickshire: A strong but evolving economy

Overall, Coventry & Warwickshire performs reasonably strongly, certainly if the benchmarks are defined within the West Midlands. It has substantial assets including: its know-how, skills and labour market (particularly linked to engineering and creativity); its pedigree in terms of research and innovation (with major universities and a range of internationally-significant research organisations with deep engineering specialisms and a renewed commitment to local connections); its cultural and creative assets (including its games development cluster); its places, ranging from Coventry, through Warwickshire's market towns, to the area's countryside; and its location which is internationally significant as well as nationally connected.

However the area is facing challenges and risks too. The risks are real – and they have upside as well as downside dimensions. They signify an economy that is changing in important respects.

Uppermost among these are: Coventry & Warwickshire's faltering performance in terms of the scale-up and growth of early stage businesses; its vulnerability in relation to net zero carbon and the challenges/opportunities associated with electrification; its skills shortages and gaps; its challenges in relation to developable land and commercial floorspace; its housing issues; its wider infrastructural challenges; and its high levels of inequality across different communities and places.

3: A new Economic Strategy for Coventry & Warwickshire

This new **Economic Strategy for Coventry & Warwickshire** has been defined in response. It is structured around **five key Themes** which are **sub-regionally relevant and**

appropriate. They are also **strongly inter-related and synergistic.** They have been identified in order to:

- provide **flexibility and agility** in the context of risk and uncertainty (politically, economically, institutionally)
- distil the core of **what Coventry and Warwickshire needs to ‘do’** (given the area’s assets, opportunities and challenges)
- be **appropriate at a sub-national scale** (given the raft of strategies and plans at both larger and smaller spatial scales)
- allow **real progress to be made** in pursuit an overall **Vision.**

The **Vision and five key Themes** which define the core of the **Economic Strategy** are summarised below.



4: Understanding the five key Themes

Theme 1 is concerned with **supporting and investing in a profound process of industrial restructuring across Coventry & Warwickshire.**

It links to both specific transitions (notably electrification at the core of automotive and aerospace) but also more general processes of industrial change driven by autonomy and automation, AI, etc. Businesses and sectors will need to modernise and adapt if they are to take advantage of new market opportunities. In parallel, people and communities will need to be equipped to respond.

Theme 2 is defined around **processes of creativity and innovation.**

While Coventry & Warwickshire already has clear strengths, there is much more that could be achieved. Theme 2 is intrinsically cross-cutting and cross-sectoral, and the aim is to encourage creativity and innovation across the board, including through tacit forms of knowledge exchange. The wider innovation ecosystem has a role to play in this context, but Theme 2 needs to be understood more broadly. Theme 2 is concerned with cultural and attitudinal dimensions of creativity and innovation – and the benefits that could follow.

Theme 3 links to the effectiveness of the wider innovation ecosystem, but the focus is on **systemic barriers to scale-up** – which is a major challenge for Coventry & Warwickshire.

Theme 3 assumes a high level of creative entrepreneurship and that start-up businesses – of many different forms – are in place; the challenge is unlocking their growth potential. This requires a particular set of intervention priorities, but it is important both in effecting sustainable economic growth and building the resilience of Coventry & Warwickshire as a whole.

Theme 4 is concerned with **Coventry & Warwickshire’s ‘place in the world’.**

The area has many world-class assets and sectoral specialisms built up over many decades, and these have a global reach – including through international students. It is already a leading inward investment destination; on a per capita basis, it is the leading geography in the UK according to recent national government data. Looking ahead, its growth opportunities need to be global. International trade and export has become more difficult in recent years, but requires support to both SMEs and UK branches of global companies. The focus on international profile also means promoting and growing the area’s visitor economy offer to international leisure and business tourists.

Theme 5 is concerned with **infrastructure and major projects.**

Within Coventry & Warwickshire, sustainable economic growth will require infrastructure investment. Some of this is already underway – but progress needs to be sustained and

accelerated. In other cases, there is research to be done, business cases to develop, and funding to be secured. Priorities need to be agreed in line with the Economic Strategy, and then driven forward. More generally, there is a need to research and implement new policy and approaches, and to bring forward new development opportunities if the area's growth is to be realised fully.

5: Advancing the new Economic Strategy for Coventry & Warwickshire

In advancing the Economic Strategy there is no 'silver bullet', nor a significant funding stream to be harnessed and used. However, Coventry City Council and Warwickshire County Council are committed to working together – building on a long track record of successful joint working. They are also committed to working with the districts and boroughs in Warwickshire. Core to this will be an ongoing dialogue – both with each other and wider stakeholders – and a commitment to sharing new evidence and insight as these become available.

The two upper tier authorities will align their own activities behind the strategy wherever it is possible to do so – noting that delivery will rely on a lot of 'influencing' and shaping mainstream processes. At the same time, each council will pursue local priorities too as set out in county and city-level strategies and plans; these have a particular focus on different aspects of employability and inclusion (which need to be advanced as a matter of urgency).

The delivery of this Strategy will rely on developing strong working relationships with others. This includes the West Midlands Combined Authority, neighbouring upper tier authorities and the new government (noting that this Strategy has much to say in relation to the emerging Modern Industrial Strategy). This will be key to making the case and unlocking investment to deliver many of the interventions identified.



1. Introduction

This document sets out a new **Economic Strategy for Coventry & Warwickshire**.

Its purpose is to **chart a course for one of the UK's most significant sub-national economies over the next decade**.

Already, the area is home to approaching a million people and well over 500,000 jobs. The value of its economic output (GVA) is close to £30bn.

The importance of economic growth – and doing it well

Economic growth is a national priority – the new government has made that very clear. But **economic growth does not happen anywhere; it needs to happen somewhere**. Coventry & Warwickshire has the assets, the appetite and the opportunity to respond.

However **economic growth also needs to be done well**. This means it should accompany – or even accelerate – the transition to net zero carbon, recognising that substantial headway needs to be made over the next decade. It also means that achieving more equitable outcomes is a non-negotiable, acknowledging the levels of inequality that continue to exist between different places and communities across Coventry & Warwickshire.

Why this strategy has been developed

Coventry & Warwickshire has had economic strategies before but with major institutional changes over recent years, the status of this one is different.

It has been developed by **Warwickshire County Council and Coventry City Council** – not because government requires it but because the two upper tier local authorities believe that Coventry & Warwickshire has a **pivotal role to play at a sub-national scale that continues to be very important**.

Notwithstanding the administrative boundaries, Coventry & Warwickshire approximates to a functional economic area: this means that many of Coventry's businesses rely on workers who live in Warwickshire (and *vice versa*), and the area's growing innovation ecosystem – which is a core part of its future economic growth narrative – can only be understood in relation to the area as a whole.

How it fits with other strategic statements

This statement of economic ambition sits alongside a suite of other strategies and plans. These are wholly complementary: most have been developed at different scales for different purposes and/or with different foci.

The suite of complementary strategies (illustrated below) includes statements developed individually by each of Coventry City Council and Warwickshire County Council. Also relevant are the key strategic statements from the West Midlands Combined Authority, particularly the **West Midlands Plan for Growth**. Wider regional level statements are significant too – most notably the

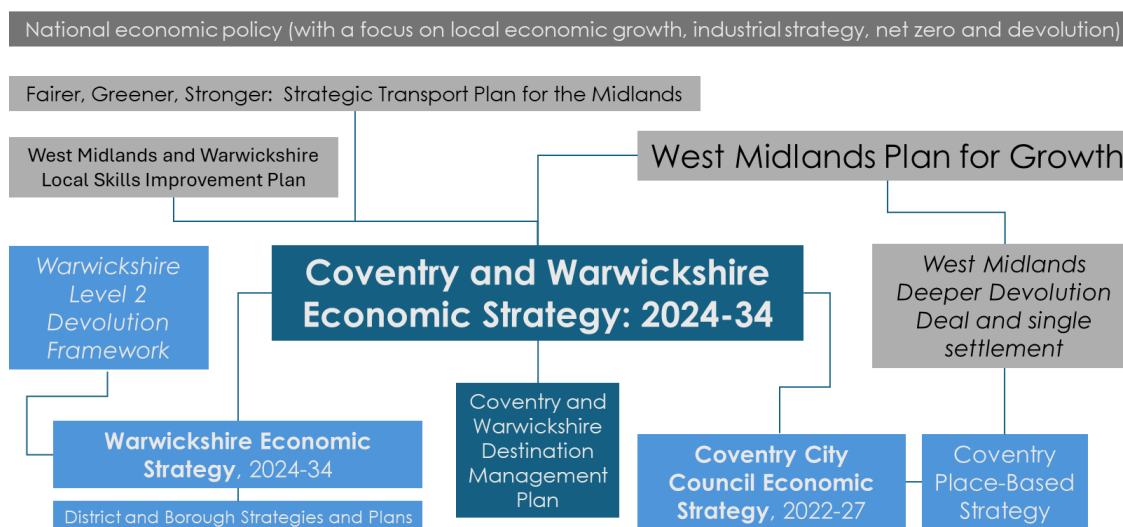
Strategic Transport Plan for the West Midlands and the **West Midlands and Warwickshire Local Skills Improvement Plan**. Finally, a range of more local strategies and plans – many developed at district or borough level – provide an insight into priorities and possibilities at a more granular scale.

In addition, it is important to consider how this strategy sits within **the fast-changing landscape of devolution**. The new government is committed to both broader and deeper devolution, accelerating a process that is now well established, and a White Paper on English Devolution is

promised shortly. At the time of writing, Warwickshire is progressing a **Level 2 Devolution Framework** while Coventry is part of the **Level 4 West Midlands Deeper Devolution Deal**. The latter brings with it more resources and powers and Coventry City Council is currently developing a **Place-Based Strategy** that will help to determine local priorities within this context.

Both in ambition and in delivery, the Coventry & Warwickshire Economic Strategy will need to work with the grain of both devolution journeys.

Figure 1-1: Synergies between different strategies across and beyond Coventry & Warwickshire – and where this one fits



The commitment to ‘looking outwards’

In framing the new Economic Strategy for Coventry & Warwickshire, one final introductory comment is important.

Coventry & Warwickshire occupies the heart of England, and it ‘looks outwards’. It is fundamentally well-

connected – to Birmingham and the wider West Midlands, Leicester, Oxford (and onto London). Whilst in regional terms, its role within the West Midlands continues to be extremely important, Coventry & Warwickshire also has strong connections into the East Midlands, the South East and on to London. Particularly as sectoral configurations change in the

light of technological and other drivers, these wider connections are becoming increasingly important too.

The area's connectivity is not just about the UK however. **Its global connections**

are a core part of its economic make-up. As the UK seeks to redefine its wider economic relationships – post-Brexit and post-pandemic – Coventry & Warwickshire has a major contribution to make.

Coventry & Warwickshire Economic Snapshot



978,500
people (2023)



4.2%
claimant count rate
(July 2024)



118,600
Economically inactive
people (aged 16-64)
(2024)



521,000
jobs (2021)



25,115
people claiming
unemployment benefits
(July 2024)



3,100
More economically
inactive people in 2024
than in Jan 2020 (aged
16-64)



43,375
enterprises (2023)



49%
qualified to degree-level
or above (2023)



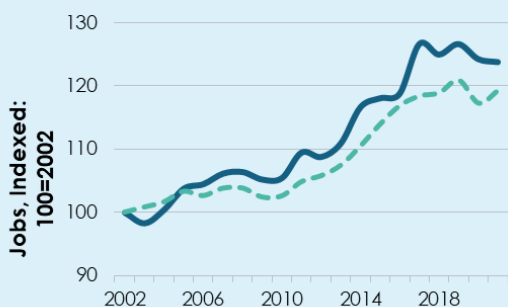
Coventry & Warwickshire generated

£28.7 billion

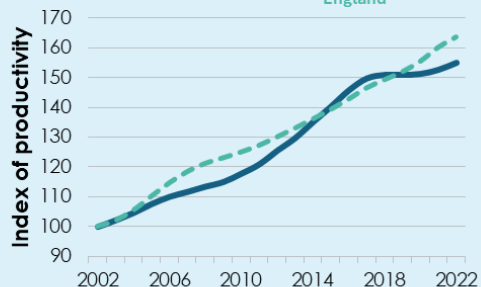
of GVA in current prices in 2022

Recent Economic Performance

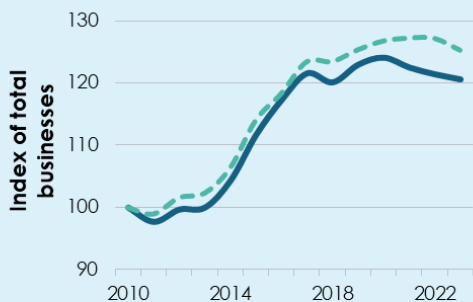
Jobs



Productivity



Businesses



Since C&W SEP (2016):

9% employment growth

10% GVA per capita growth

4% growth in business stock



80%
economic activity rate
(2024)



£645
average weekly employee
earnings (full-time) (2023)



1st
best performing former
LEP area for the number
of new jobs created
through FDI investment
(per capita) (2023)



6%
of neighbourhoods
among the most 10%
deprived nationally (2019)



89%
Are micro businesses
(employing 0-9 people)
(2023)

2. Taking the long view: looking back and looking forward

Coventry & Warwickshire has an economy which performs well overall – albeit there are substantial variations within it.

Coventry & Warwickshire is usually compared to the West Midlands. From this perspective (and however the West Midlands is defined), skills levels are generally high, employment rates are strong, and unemployment rates are low.

Looking beyond – and drawing in a different perspective

The West Midlands should not be the sole benchmark. For a sub-national area with globally significant assets, there is much to be learned by looking to the east and south. We have labelled this area the ‘Eastern Crescent’. It includes adjacent parts of three ITL1 regions (East Midlands, South East, South West)¹ and within it are three small cities (Leicester, Oxford and Milton Keynes) and the predominantly rural area surrounding them. In a comparative perspective, it sheds a different light on Coventry & Warwickshire – particularly when the West Midlands Metropolitan area² is also added to the mix.

¹ This is a large area, which includes 14 local authority districts/boroughs and unitary areas. These are adjacent or close to Coventry & Warwickshire, but exclude neighbours in the West Midlands. The Eastern Crescent is therefore defined as: Blaby, Daventry, Harborough, Hinkley and Bosworth, Leicester, Northampton, Oadby and Wigston, South Northamptonshire, West

The charts overleaf take the long view – and most have a 20 year perspective. From this vantage point, Coventry & Warwickshire has seen:

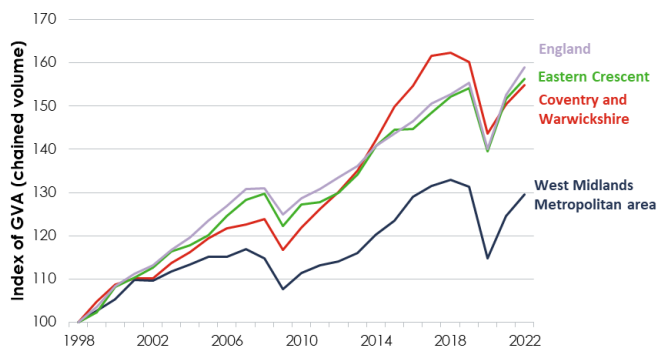
- generally rapid jobs growth – at least until the pandemic
- more volatile performance in terms of GVA (particularly around the Global Financial Crisis), but a strongly positive picture overall
- relatively high absolute levels of productivity (and also growth in productivity) until recently: the apparent ‘flattening’ of recent years is a matter for this Economic Strategy to address
- rapid growth in business stock until 2017, but little net growth since.

On all four indicators, Coventry & Warwickshire’s growth trajectory has been closer to that of the Eastern Crescent (and England) than to the West Midlands Metropolitan area. This perspective is important.

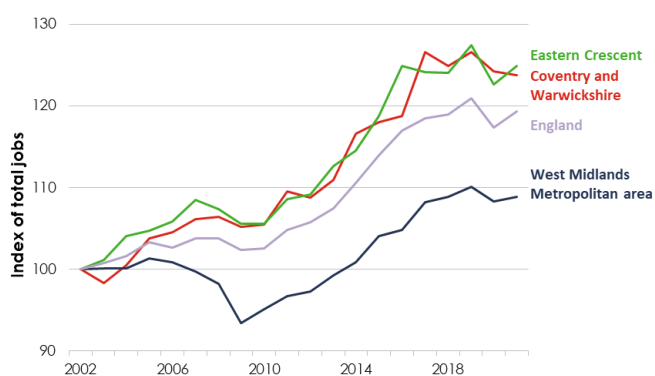
Northamptonshire in the East Midlands ITL1 region; Milton Keynes, Cherwell, Oxford and West Oxfordshire in the South East ITL1 area; and Cotswold in the South West ITL1 area
² This is the core WMCA area and includes Coventry (which is also obviously included in Coventry & Warwickshire)

Figure 2-1: Comparing headline metrics for Coventry & Warwickshire with (a) West Midlands Metropolitan area; (b) Eastern Crescent; and (c) England

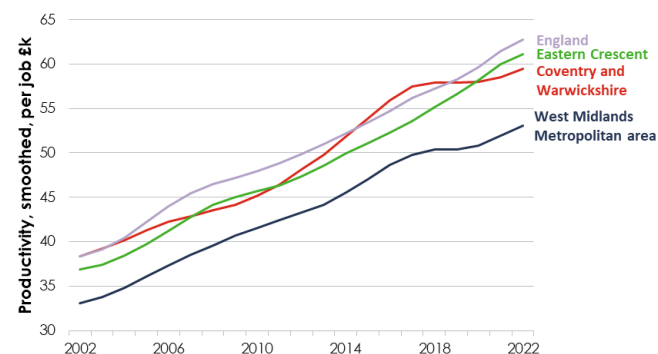
(i) Index of GVA performance



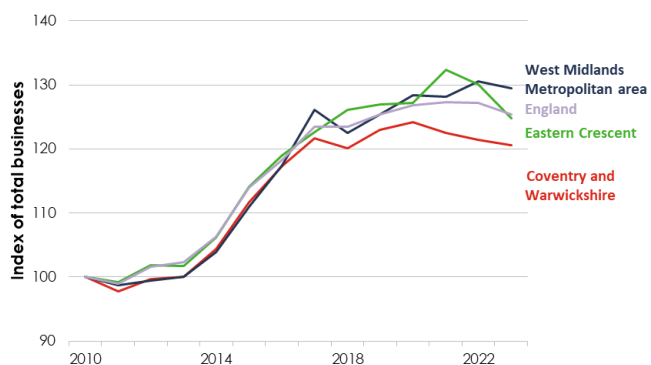
(ii) Index of total jobs



(iii) Productivity



(iv) Index of total businesses



(Source: Analysis of ONS datasets – Total Jobs, Regional Accounts, UK Business Counts (IDBR))

Baseline forecasts

To inform the new Economic Strategy, a set of baseline forecasts was developed for Coventry & Warwickshire. The findings were considered alongside similar modelled output for the West Midlands (on different definitions); for the 'Eastern Crescent' (and for Great Britain).

In terms of (BRES) **employment**, the historic data confirm that Coventry & Warwickshire grew more quickly than any comparator between 2012 and 2022. It also grew more quickly than was the case nationally.

Looking ahead, the modelling suggests that the rate of employment growth will be lower across the board. For Coventry & Warwickshire, the model points to employment growth of 0.7% per annum between 2022 and 2032, and 0.8% per annum over the following decade. This is less than half the rate seen in the last decade. However the modelling indicates that the pattern is likely to be very similar elsewhere³.

In relation to **GVA**, Coventry & Warwickshire again saw the fastest

growth amongst the areas considered over the period between 2012 and 2022. Looking ahead, the model points to GVA growth of 2.9% per annum between 2022 and 2032, before slowing slightly in the following decade. The forecasts for Coventry & Warwickshire are more bullish than for all comparators – albeit the differences are modest.

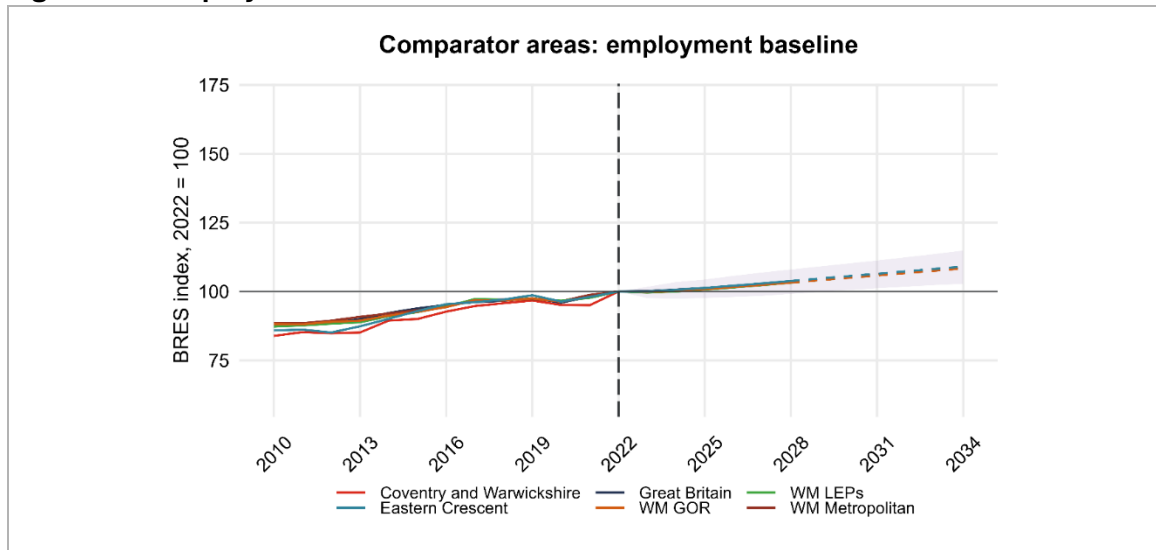
Considering the forecasts for GVA and employment in combination provides some indication of prospects for **productivity** – which is a key indicator looking forward. Again, the picture for Coventry & Warwickshire appears to be quite strong. On this measure, it performs better than both the West Midlands comparators, and the Eastern Crescent.

Whilst modelled forecasts need to be treated with a good deal of caution, they provide some indication of the overall prospects of the local economy. For Coventry & Warwickshire, they suggest a reasonably strong foundation on which to build as the area looks forward.

³ Note that although not directly comparable, this overall pattern is similar to that reported in the *Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA)* (completed by Iceni Projects (on behalf of Coventry & Warwickshire local

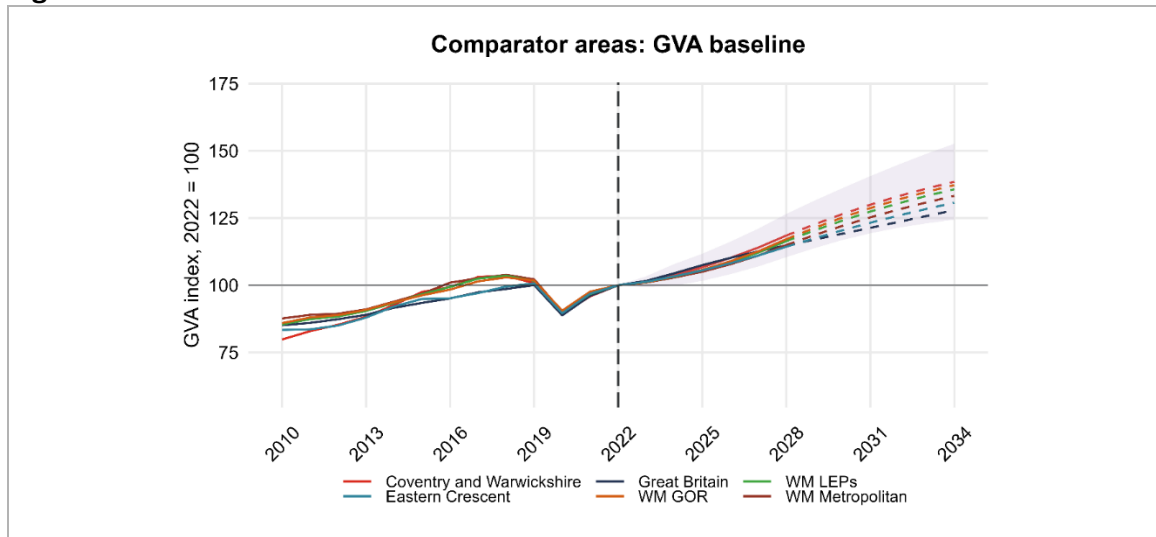
authorities, November 2022)). The baseline forecasts in the HEDNA suggested employment growth of 0.5% per annum between 2019 and 2043 (compared to a much faster historic growth rate of about 1.0% per annum)

Figure 2-2: Employment forecasts



Source: SQW

Figure 2-3: GVA forecasts



Source: SQW

3. Assets, opportunities, challenges and risks

This chapter distils much of the evidence underpinning the Economic Strategy. It explains – in substantive terms – why the new strategy is so important. **In short, Coventry & Warwickshire has assets, opportunities, challenges and risks that are inherently bound up with each other. There is much on which to build – but there are also some clear risks and vulnerabilities in doing so.** The new Economic Strategy needs to navigate and respond to all this.

Assets and opportunities...

Coventry & Warwickshire has significant economic assets – many of which are inter-related and mutually reinforcing. These were identified by businesses during the strategy’s preparation; and they are also apparent through secondary evidence and data.

Its ‘know-how’, skills and labour market

Coventry & Warwickshire has deep ‘know how’ and a labour market that is – in many respects – second to none. It includes highly skilled engineers – many with experience of working for major primes in automotive and aerospace (most especially Aston Martin, Lagonda, BMW, JLR, Meggitt and Polestar) and across their supply chains. Whilst many individuals have entered the sector and thrived as apprentices, specialist provision has also been developed in response – for example, Coventry

University offers higher degrees in automotive engineering.

This deep engineering pedigree is well established and well documented, but alongside it, Coventry & Warwickshire also benefits from outstanding digital and creative skills and knowledge.

Some of this is linked to the growth of the games sector which is driving forward digital innovation and next generation creative content. There is a major hub in and around Leamington Spa (Box 3-1).

Box 3-1: Creativity and gaming in and around Leamington Spa

Coventry & Warwickshire has a globally significant gaming cluster which is one of the largest in the UK.

Its origins can be traced to the 1980s and the formation of Codemasters. The company grew rapidly, and in parallel, some early employees left to set up their own small businesses locally; these processes were synergistic and they led to the emergence of a distinctive games development cluster. SEGA (now part of EA), Tencent and Ubisoft now have a significant local footprint while Mediatonic, the studio behind the Gears of War mobile game, has also opened a local facility. There are, in addition, large numbers of much smaller companies and also a network of talented people working on a freelance basis.

The cluster is focused on Leamington Spa. Some 75% of the digital media companies in the area are games

companies. Research by CWLEP/Invest Warwickshire suggests that over 3,000 skilled games professionals work in Leamington Spa, equating to over 10% of the UK total in games development. Their skillsets include design, software development, artificial intelligence, augmented reality, virtual reality and product development; they therefore have widespread application which extends far beyond gaming.

There is another dimension too – and this has become more apparent since the pandemic. It surrounds the skills and networks of the people who live in Coventry & Warwickshire even if their employers are based elsewhere. Many of these individuals are spending time working from home – and benefiting from the area’s outstanding quality of life. The business networks they are forming as residents (rather than necessarily as workers) appear to be gaining traction.

Put together outstanding engineering pedigree with creative and digital skills, and the latent potential of those who live locally but formally work elsewhere, and there is a labour market cocktail of enormous opportunity . This ought to be materially significant in creating a foundation for sustainable and added value growth in the years ahead.

Its pedigree in terms of research and innovation

Intrinsically linked to the character of its labour market is the area’s pedigree in respect of research and innovation.

In part, this is driven by its major businesses. The latest data produced by ONS (*Business enterprise research and development, 2022*) suggest that nationally, R&D expenditure by businesses summed to just under £50bn (in current prices) in 2022. This implied a real (constant price) increase of about 30% from the figure in 2014. The West Midlands (ITL1) region accounted for 7.7% of expenditure and 8.4% of UK business R&D employment. Extracting data below ITL1 levels is problematic, but the sectoral breakdown of national business R&D expenditure by sector is aligned with Coventry & Warwickshire’s private sector research specialisms – in motor vehicles and parts (where £3.7bn was invested by businesses in R&D nationally) and aerospace (£2.0bn) in particular.

Box 3-2: Research and innovation in the automotive sector

Coventry & Warwickshire has huge pedigree in relation to the automotive sector. JLR’s principal research site is at Gaydon. According to its Annual Report 2022/23, it employed over 8,600 people (company-wide) in R&D in 2023. Aston Martin’s HQ is also at Gaydon, as is its main R&D centre. Other global OEMs with a significant R&D presence include Polestar and TATA Motors.

For the automotive sector, the major challenge/opportunity surrounds the transition to electric vehicles. Coventry & Warwickshire has seen significant corporate investment in this context, sometimes involving both businesses and academic collaborators (from within the sub-region). This is driven in part by the

type and direction of government funding at a national level, which links to the Advanced Propulsion Centre and focuses on collaborative R&D.

In 2023, for example, Aston Martin's electrification programme was awarded £9m funding from the Advanced Propulsion Centre, supplementing its in-house battery electric vehicle platform; the award involved a six-partner collaborative R&D project and other partners included the Manufacturing Technology Centre (based at Ansty Technology Park) and WMG, University of Warwick.

Coventry & Warwickshire is also home to two major universities. **University of Warwick** is a Russell Group university. It is the Midlands' top ranked university according to the Sunday Times. The university has just under 30,000 students. Under the Research Excellence Framework (REF, 2021), over 90% of its research was rated 'world leading' or 'internationally excellent', and in 2022/23, its research income was £191m (*Warwick 2030: Reshape, Refresh, Renew* (updated in March 2024)). Its research specialisms span business, science, engineering, mathematics, computer science, and arts and cultural disciplines.

WMG (Warwick Manufacturing Group) is part of the University of Warwick, and accounts for about a third of the university's activity by spend and headcount. Its research is focused on five themes (data, electrification, manufacturing, materials and transport).

⁴ Note that the name has been changed since the Annual Highlights report was published

It has specialisms in battery technology. It is also one of the UK's seven Advanced Manufacturing Catapult Centres, delivering the Advanced Materials Battery Industrialisation Centre (AMBIC) – a scale-up facility – which builds on earlier investment in UKBIC (also involving WMG). WMG is working closely with WMCA to deliver the Electric Vehicle and Battery Storage cluster (*Annual Highlights, 2023*, published by WMG)⁴.

University of Warwick is increasingly seeing itself as a regional player. It has launched a major initiative to develop **Warwick Innovation District** – spanning the main university campus but also a range of other facilities. This will be increasingly important over the lifetime of this strategy.

Coventry University has different and distinctive specialisms. The university has long had a strong reputation in automotive and industrial design, and before that it had its roots in Lanchester College (a name associated with the highly innovative Lanchester company).

Coventry University formed an Institute for Advanced Manufacturing and Engineering (a collaboration between Coventry University and Unipart Manufacturing Group) in 2014.

It also has a collaboration with HORIBA MIRA to create a Centre for Connected and Autonomous Automotive Research to pioneer and test new developments linked to future transport needs.

This is based at MIRA Technology Park, which is a leading automotive research and development facility. It offers advanced testing and engineering services for the automotive, defence, aerospace, and rail industries. The Park includes specialised test tracks, laboratories, and simulation tools, providing a hub for innovation in vehicle technologies, autonomous driving, and electric vehicle development. It attracts global companies and fosters collaboration between engineers, researchers, and manufacturers.

Coventry University developed a *Research Strategy 2030* which emphasises eight research themes. These are: health and wellbeing; clean growth and future mobility; data science and emerging technologies; sustainability, equity and resilience; responsible business, economies and society; peace and security; global education; and creative cultures. The Strategy is committed to enterprise and innovation. It states: *“linked to our campus locations and research facilities, we will establish a series of innovation districts, bringing together innovators, entrepreneurs, researchers, creatives, and investors to work together to create the conditions for significant economic growth”*.

Its cultural and creative assets

Coventry & Warwickshire has major assets in respect to culture and creativity.

Coventry hosts the Belgrade Theatre and the Herbert Art Gallery and Museum. It is home to two leading transport museums:

Coventry Transport Museum and the British Motor Museum at Gaydon (featuring the largest automotive archive and the largest collection of British-made cars). It also has a thriving independent arts sector.

Stratford-upon-Avon is the birthplace of William Shakespeare and home to the Royal Shakespeare Company Theatre; it is a major destination for international visitors. Warwick is the county town. Warwickshire also has a successful and growing festival scene encompassing music, performing and visual art, literature and food.

Coventry & Warwickshire is a successful visitor destination with a strong and compelling offer. Over 26 million visits and £2.1bn in spend are generated in the local economy. Tourism alone is worth £1.3bn to Warwickshire’s economy and supports some 70,000 jobs across Coventry & Warwickshire.

Coventry was awarded City of Culture status for 2021, and this ought to have been a significant fillip to the sector. In practice it was badly affected by the restrictions linked to the pandemic, and the City of Culture Trust, an independent charity set up to oversee its delivery, went into administration. Nevertheless, associated economic impacts have been estimated to include £20.9m of net additional off-site and organisational expenditure in Coventry & Warwickshire;

and 225 one-year net additional full time equivalent (FTE) jobs⁵.

In the round, Coventry & Warwickshire's cultural and creative assets are a further reason why individuals and businesses choose to locate in the area. They need to be recognised as a key part of its economic asset base.

Its places

Also important is the diversity of its places.

Coventry is a city with international ambition and potential. It is a place that has reinvented itself multiple times, but it has resilience as a consequence – and it is now seeing renewed investment and growth, some of it linked to the key sectors outlined above.

The major market towns of Warwickshire – including **Atherstone, Leamington Spa, Nuneaton, Rugby, Stratford-upon-Avon and Warwick** – are all different. Some are historic and relatively affluent; some host key clusters (such as games development in Leamington); and some are on-going priorities for regeneration.

The **Warwickshire countryside** must also be recognised as an asset. Large parts of the districts of North Warwickshire, Rugby and Warwick are within the West Midlands Green Belt. This means that developable land is often in short supply – and for the new Economic Strategy, the implications are important.

⁵ *Coventry UK City of Culture 2021 – Impact Evaluation*, completed by University of

That said, some of the largest developments of industrial space in the West Midlands have taken place in North Warwickshire and Rugby (e.g. at Hams Hall, Birch Coppice, Ansty Technology Park and Tritax Symmetry Rugby).

Its location

Finally, it is crucial to recognise the economic significance of Coventry & Warwickshire's location, and its connectivity – at the heart of the UK and globally. It occupies the 'golden triangle' of the motorway network (M1/M6/M42) which means that a substantial population is within easy reach. It has strong rail (freight and passenger) links. It also benefits from proximity to Birmingham International Airport and East Midlands Airport, while Heathrow Airport is two hours away.

The route of HS2 crosses Warwickshire. Although there is not a planned HS2 station within Coventry & Warwickshire, the HS2 project is an important driver of economic growth currently (through the construction phase) and longer term economic benefits ought to follow – particularly in North Warwickshire (which is close to the UK Central / Arden Cross and the Interchange station in Solihull) and Coventry (noting that the mainline station is 10 minutes from Birmingham International).

Challenges and risks

Alongside these assets and opportunities, Coventry & Warwickshire faces a series of

Warwick and Coventry University in partnership with Coventry City Council

challenges and risks. These need to be acknowledged within the Economic Strategy and addressed, whether directly or through the companion strategies identified in Figure 1-1. Some of the challenges and risks are the ‘flip side’ of major assets.

Its faltering performance in terms of scale up and growth

Despite the strength of its research base and the pedigree of its innovation assets, Coventry & Warwickshire actually has a poor track record in relation to scaling growth for businesses. From this perspective, it is a long way behind key comparators – notably neighbouring Oxfordshire (and recognising that three of Oxfordshire’s districts are included within the definition of the Eastern Crescent set out earlier).

The Scale-Up Institute has examined changes in scale-up density between 2013 and 2021 across (former) LEP areas in England and the devolved nations. Across over 40 local economies, Coventry & Warwickshire is identified as the second worst performing (in front only of the Black Country) on this measure.

Quite why this should be the case is hard to explain. It could be a quirk of data, but there appear to be substantive issues too: early-stage equity investment appears to be in short supply and investor networks are underdeveloped (certainly as compared to elsewhere). There may also be issues linked to the supply of appropriate commercial premises. A third factor may be the challenging ‘growth routes’ that typically need to be

navigated by firms within the area’s strongest sectors.

Its vulnerability in relation to net zero carbon – but also the opportunity linked to it

One reason why the area’s poor performance in relation to scale-up is such a concern is that Coventry & Warwickshire is structurally vulnerable to the full implications of decarbonisation and the shift away from fossil fuels. In practice this is both an opportunity and a threat: the sub-region owes much to automotive, aerospace and vehicle engineering and these activities are being transformed through electrification. Seeking to scale-up start-up businesses as a route to broader diversification is therefore important as a route to greater economic resilience.

Its skills shortages and gaps

Coventry & Warwickshire needs also to address skills shortages and gaps. Whilst its overall qualifications profile is good, the demand for new and different skills is relentless – and as sectors evolve, the requirements of employers change. There is strong provision within the area – including through the Warwickshire Skills Hub and the Coventry Careers Hub – but there is more to be done.

Its challenges in relation to developable land and commercial floorspace

The corollary of an outstanding location, fast growth and large areas of Green Belt is pressure on developable land – although the overall picture is

complicated. A recent study by Icení found that:

- **office floorspace** has been lost across Coventry & Warwickshire since 2012 at a rate that is three times greater than the regional average. Office markets are strongest in Coventry and Leamington/Warwick but elsewhere there are major issues linked to viability. Some office space has been upgraded but some space is vacant and awaiting refurbishment.
- conversely, there is a strong demand for **industrial premises**, particularly in the north (North Warwickshire, Coventry, Rugby), but much of this is driven by demand for logistics/distribution space (particularly in relation to larger ‘big box’ provision). Whilst some new supply is coming forward, *“there will likely be a continuing need to replenish industrial supply over time if economic growth is not to be constrained”*⁶.

Within this context, **there is a real need for ‘move-on’ space** (particularly units of <10,000 sq ft and 10-50,000 sq ft). This has been identified through property market studies and could well be a contributory factor in relation to poor scale-up performance identified above.

⁶ *Coventry & Warwickshire Housing and Economic Development Needs Assessment (HEDNA)*, Icení Projects (on behalf of Coventry & Warwickshire local authorities, November 2022)

⁷ *Coventry & Warwickshire Housing and Economic Development Needs Assessment*

More generally, the commercial property market is both complicated and under some pressure. It will be important that appropriate consideration is taken of the nature and scale of demand from key sectors, recognising that this itself is changing.

Its challenges in relation to housing and affordable housing

Coventry & Warwickshire – like most local economies – is facing a range of issues linked to housing. House prices grew by an average of 6.9% per annum between 2000 and 2020 – about a percentage point more than the average for the West Midlands ITL1 area and for England⁷. Housing affordability has deteriorated, although it varies substantially across the area: Stratford-upon-Avon is the least affordable district (with an affordability ratio of 11.15 in 2023, compared to a national average of 8.14); Coventry is the most affordable local authority area (5.57)⁸.

The shortage of **affordable homes and rented accommodation** is a challenge for residents and businesses alike.

Its infrastructure challenges

As it looks forward, Coventry & Warwickshire is also facing wider infrastructure challenges.

(HEDNA), Icení Projects (on behalf of Coventry & Warwickshire local authorities, November 2022) – para 4.3

⁸ House Price Statistics for Small Areas and Annual Survey of Hours and Earnings from the Office for National Statistics

Whilst the area has outstanding links to the national transport network (road and rail), **local connectivity** is considered to be less strong. This is stifling economic ambition and change – and it means that those in more deprived parts of the sub-region may not be able to access the growth opportunities that do exist. Within this context, there is a need to identify network capacities and constraints, and to establish sustainable transport opportunities (corridors, nodes, active travel, electric vehicles and accessible places), linking to the work and evidence of Midlands Connect, and making the best use of the existing transport infrastructure. In this context, working with other partners – notably WMCA – will continue to be important.

There is also a need to establish other key infrastructure capacities, needs and opportunities that could be a significant driver of, or barrier to, future growth. These include utilities, waste, education and health infrastructure, and energy needs (demand and supply). Issues surrounding power supply appear to be a particular concern. They will affect the growth of key sectors if not addressed.

Water is identified as a further challenge – both in guiding development towards the most appropriate locations (taking into account flood risk, future resilience and climate change impacts) and establishing

the capacity and need for new water and wastewater infrastructure⁹.

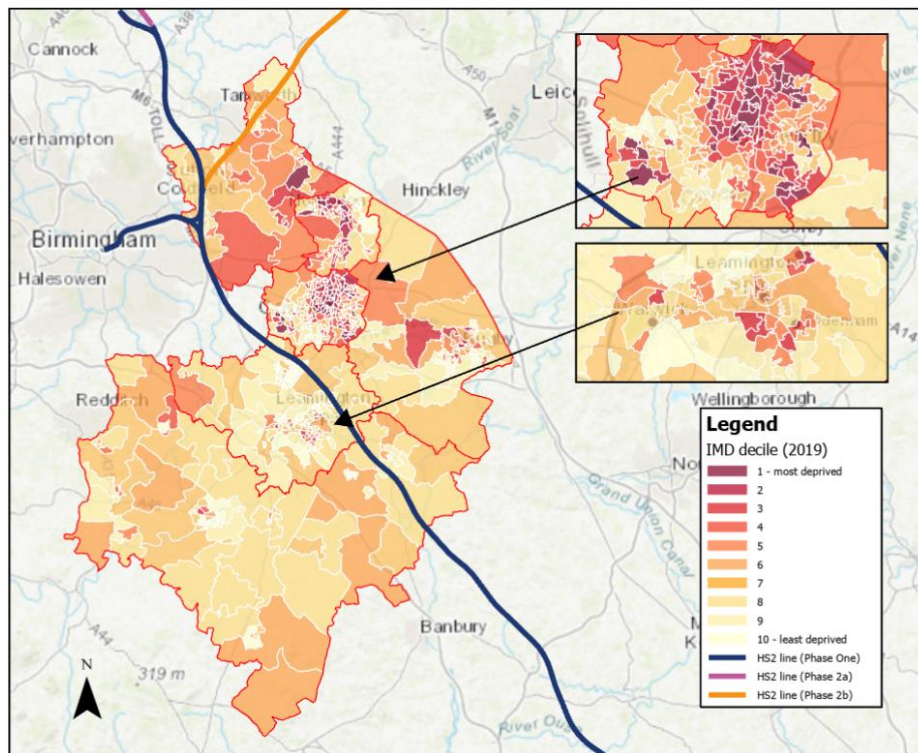
Its challenges linked to inequality

Finally – and perhaps most importantly – there are significant and ongoing challenges linked to **the scale of inequality** across the sub-region. Data from the Index of Multiple Deprivation (2019) highlight the spatial differences which exist across Coventry & Warwickshire. The south is more prosperous than the north. Warwick and Stratford-on-Avon districts fare better than Coventry (particularly the north and east of the city), Nuneaton and Bedworth, and North Warwickshire. Figure 3-1 (below) provides an indication of the extent of inequality across the sub-region.

A similar picture is apparent in relation to the qualifications profile. The proportion of working age people qualified to NVQ level 4 and above ranges from 35.4% in Nuneaton & Bedworth and 31.7% in North Warwickshire to 49.1% in Stratford-on-Avon and 49.4% in Warwick. Warwickshire's *Economic Growth Strategy* and the Coventry *Economic Development Strategy* both identify inclusive growth as a key principle for the future development of the area.

⁹ *Strategic Planning Case Study – Coventry & Warwickshire*, Planning Advisory Service, 2020

Figure 3-1: Index of Multiple Deprivation, 2019



Source: *Index of Multiple Deprivation, MCLG, 2019*

Conclusions

The evidence summarised above is complicated and mixed. It highlights Coventry & Warwickshire's assets and potentials – but also the scale of challenges that the sub-region needs to address. Some of these challenges are a corollary of success and – in a sense – they are good problems to have; but they are problems nonetheless. Others are simply unacceptable: the scale of

inequality across the wider sub-region is a case in point.

A third set might be regarded as possible problems rather than immediate threats, but they do point to the need for resilience and – implicitly – the fragilities that exist in the context of constant change. Many of these are likely to be tested over the years ahead in the light of a whole series of future trends and drivers. It is these that provide the focus for the chapter that follows.

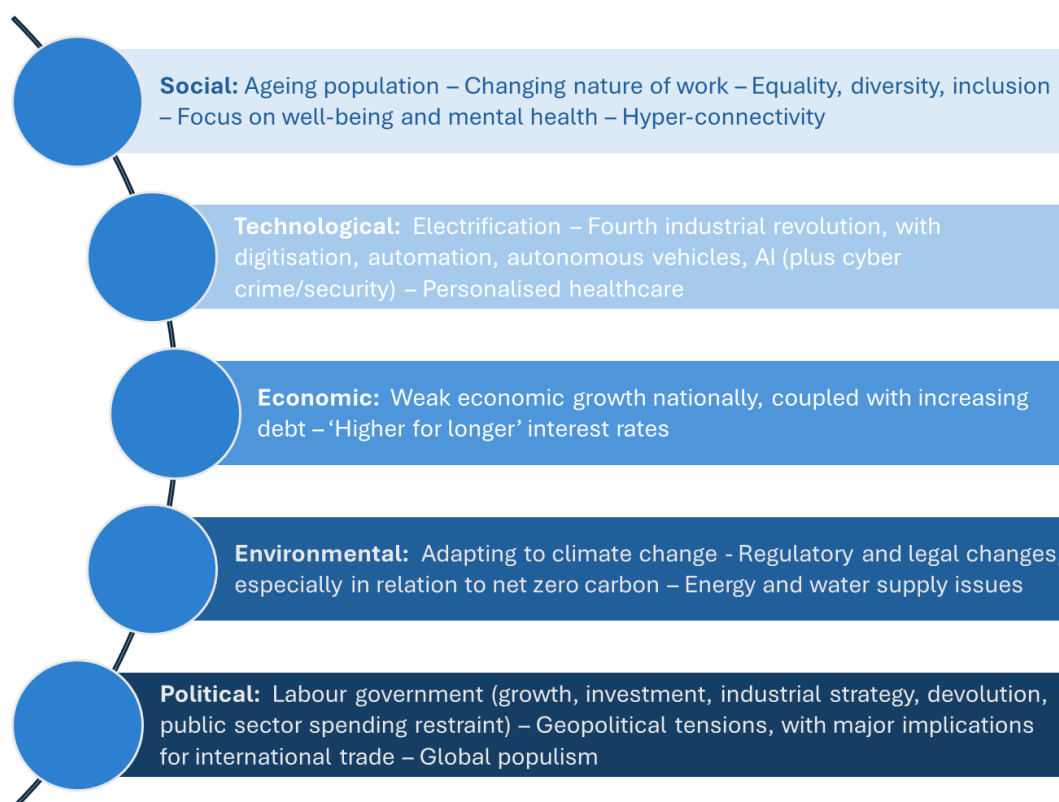
4. Trends and drivers shaping the future

In framing a forward-looking strategy, it is a truism that the future may look really quite different from either the present or the past. Many established trends and drivers are generic in character, affecting every sub-national economy in the UK, and most have international dimensions too. However they have a particular form in Coventry & Warwickshire – particularly given the assessment set out in Chapter 3.

Moreover they are likely to work through in combinations that could well be unique. They present a distinctive set of challenges and risks given the area’s economic structure, character and heritage.

Some key trends and drivers that are likely to be especially relevant are illustrated in Figure 4-1 and then described in the paragraphs that follow.

Figure 4-1: Key trends and drivers that might shape the next decade



Social trends and drivers

Looking back, the 2020-22 pandemic provides an important ‘marker’ in relation to societal change – and in many

respects, it is a watershed in defining the end of the ‘early’ part of the 21st Century. While it did not cause many of the changes that were observed, it accelerated the pace of change

substantially: short term adaptations have quickly become accepted as the new 'normal'.

One very obvious element is linked to the **nature of work** – specifically, where and when it is done, and what forms it takes. The shift to working from home was fundamentally enabled by digital technology, but the pandemic made it first essential and then acceptable such that in many sectors, remote and/or hybrid working is now commonplace. The consequences are different routines, different uses of public transport (which is often now busier at the weekends than during the week), different relationships to work places (and particularly town centres) and different forms of social interaction. All of this brings with it major questions linked to both innovation and productivity – which are key themes in this Economic Strategy.

Whilst not the cause, the pandemic also prompted far greater consideration of **wellbeing** in general and issues linked to **mental health** in particular. This in turn links to changing social relationships – some work-related, some the consequence of smaller households, and many linked to 'hyper connectivity' through social media, and the levels of scrutiny/pressure that can come through it.

It also links to an increasing **generational chasm**, especially through a new form of digital divide. The 'digital natives' of Gen Z have a very different relationship to digital technology than their parents and grandparents, and the rest of the 'baby boomer' generation. This has huge

implications, including in relation to appropriate forms of service delivery and consequential risks of exclusion.

Across Coventry & Warwickshire – as the rest of the UK – the population is now far more **diverse** than a generation ago. In 2021, half of all children born in Coventry had at least one parent who was born outside of the UK and in 2019, over 190 languages were spoken by Coventry school pupils, in addition to English. The whole area is ethnically diverse and it is culturally richer as a consequence. There is also far more awareness of protected characteristics and intersectionality – and also greater recognition of the structural biases this can create.

Cutting across all of this is a need to recognise the pace and consequences of a population which is **ageing**: as lifespans increase and birth rates fall, the population is getting older. The economics of an old population are challenging, both for individuals (given increasingly challenging pension arrangements) and for the nation as a whole given huge demands for health and social care.

Technological trends and drivers

The pace of technological change is relentless.

The **decarbonisation of the economy**, including manufacturing and transport, with the wider use and deployment of **electrification**, will continue to be a challenge and opportunity (particularly for

Coventry & Warwickshire, given its links to internal combustion technology).

The **digital transformation** – or the fourth industrial revolution as it has been described – continues to redefine many dimensions of how people live and work and how the economy functions.

Automation is a key part of this and one that will shape the future. Many jobs will be lost through automation – but new ones are also likely to be formed. For an economic strategy, this is very important: it means that many of the jobs that will provide the livelihoods of people in Coventry & Warwickshire ten years from now do not yet exist – which in turn means that forward planning is very difficult. The challenge is obvious for businesses and education providers.

The possibilities – and challenges – linked to **artificial intelligence** (AI) is another dimension. It too will be transformational – from the delivery of healthcare to the management of transport networks.

On a different front, in the context of scientific advances, the transition to more **personalised medicine** is likely to accelerate – improving outcomes for patients and also bringing with it imperatives in relation to the growth of life sciences as a key sector nationally.

Economic trends and drivers

In the economic sphere, the challenges of **consistently weak economic growth, coupled with significant national debt**, are an ongoing concern – particularly given the financial costs of the pandemic and the UK's continuing adjustment

following its departure from the EU. In the UK at least, the consequence is widely expected to be fiscal changes which will affect individuals and businesses alike.

In addition, after a decade of very low interest rates pre-pandemic, **the cost of borrowing** has escalated and it is likely to remain relatively high (despite a recent reduction in the base rate from the Bank of England). This is likely to be problematic for businesses which are seeking to borrow money – whether to fund growth or to effect ownership changes.

Environmental trends and drivers

In the environmental sphere, the imperatives surrounding the urgent need to **adapt to climate change** are both clear and wide-ranging.

The UK has had a legally binding net zero target since 2019. This has led to ambitious targets linked to the net zero transition – although early milestones have been reprofiled as the practicalities of achieving them became more apparent. Nevertheless, significant progress will need to be made – including with regard to electrification and also to retrofit – if the targets are to be achieved. Importantly, similar ambitions and targets have been set in many other national economies.

There is also a question as to whether expectations surrounding **consumption** simply need to be managed – with more emphasis on the circular economy (reusing and recycling materials) and reduced consumption overall.

Linked in part to the climate emergency are substantial challenges relating to **energy and water supply**. These are biting across Coventry & Warwickshire – albeit many other areas are under similar pressures. Resolving these challenges will be imperative if sustained and sustainable economic growth is to be achieved.

Political trends and drivers

As of July 2024, the UK has a new Labour government with a large majority in the House of Commons. Its priorities include:

- accelerating the pace of economic growth
- addressing the housing crisis and introducing planning reforms
- advancing both deeper and wider devolution, as a route to addressing spatial disparities across the UK
- supporting clusters and place/area-based economic assets – including through a new Modern Industrial Strategy
- achieving green growth and progress towards net zero carbon targets

- redefining the UK’s role and profile internationally.

Although there is a commitment to investment, priorities will need to be delivered in the context of continuing pressure on the public finances.

There are also political drivers that are international. These include: geopolitical instability (notably war in Ukraine and conflict in the Middle East); the possibility of emerging bilateral alliances, particularly given levels of debt in some less developed nations; the structures put in place to deal with misinformation, including in relation to cybercrime; and the range and effectiveness of global responses to climate change mitigation and adaptation.

After thirty years of globalisation, international trade has become more challenging, and is likely to remain so given the shifting global political backdrop.

In addition, the rise of populism globally – fuelled in part by social media – is a further political driver. It brings with it a fundamental questioning (or even distrust) of core institutions.



5. Vision and Strategic Economic Framework

Defining a Vision...

Consistent with the evidence summarised in chapters 2, 3 and 4 – and the statement of purpose in Chapter 1 – the **Vision** at the heart of Coventry & Warwickshire’s new Economic Strategy is set out in full below.

The Vision is aspirational and ambitious. It reflects some of the risks facing the area but also the huge opportunities which are available to it. It

recognises fully the need to be more inclusive and more sustainable – so that all places within Coventry & Warwickshire, and all communities, might benefit.

As partners and stakeholders strive towards the Vision, Coventry & Warwickshire will fulfil its potential and achieve high value economic growth which will deliver a range of benefits locally, regionally, nationally and internationally.

Vision

By 2034, Coventry & Warwickshire will be **recognised for the role of its innovation-focused knowledge economy**, particularly in **nurturing creativity, harnessing digital possibilities and solutions, enabling future mobility, and unlocking the opportunity of electrification.**

This will be achieved through **major research-intensive businesses and universities/institutions**, but also through the dynamism and effectiveness of a **rich but varied innovation ecosystem** in which creativity flourishes and new businesses are formed, nurtured and grown.

Over the next decade, Coventry & Warwickshire will see economic transformation and growth, through new skills and competencies, and through a process of economic restructuring (especially as established businesses/sectors pivot in response to regulatory and technological change).

As a result, **the whole area will be known around the world for its economic vibrancy, founded on creativity and innovation.** The **productivity** of the local economy will also have grown.

The **benefits will be enjoyed by all** who live and work in Coventry & Warwickshire, and **inequalities between people, communities and places will be much reduced.**

...and respecting the distinctive character of Coventry & Warwickshire

The delivery of this Vision will be shaped by (and will respond to) the **distinctive character of Coventry & Warwickshire as a series of places**.

This includes:

- the **towns (and their environs) which help to define the area's economic distinctiveness**, particularly in relation to some key growth sectors/clusters and locations
- **Coventry**, as a compact, vibrant and ambitious city
- those areas across Coventry & Warwickshire that **experience economic underperformance currently** (both absolutely and relatively)
- the **rural areas**, which set Coventry & Warwickshire apart and help to define what makes Coventry & Warwickshire special
- **links beyond Coventry & Warwickshire**, particularly to Birmingham (as England's second city) and into Oxfordshire, Northamptonshire and Leicestershire
- the **international connections** that help to define Coventry & Warwickshire, and the opportunities arising from them.

Strategic Economic Framework

Progress towards the Vision will be made through **five Themes**. These will galvanise activity and give it purpose, focus and intent.

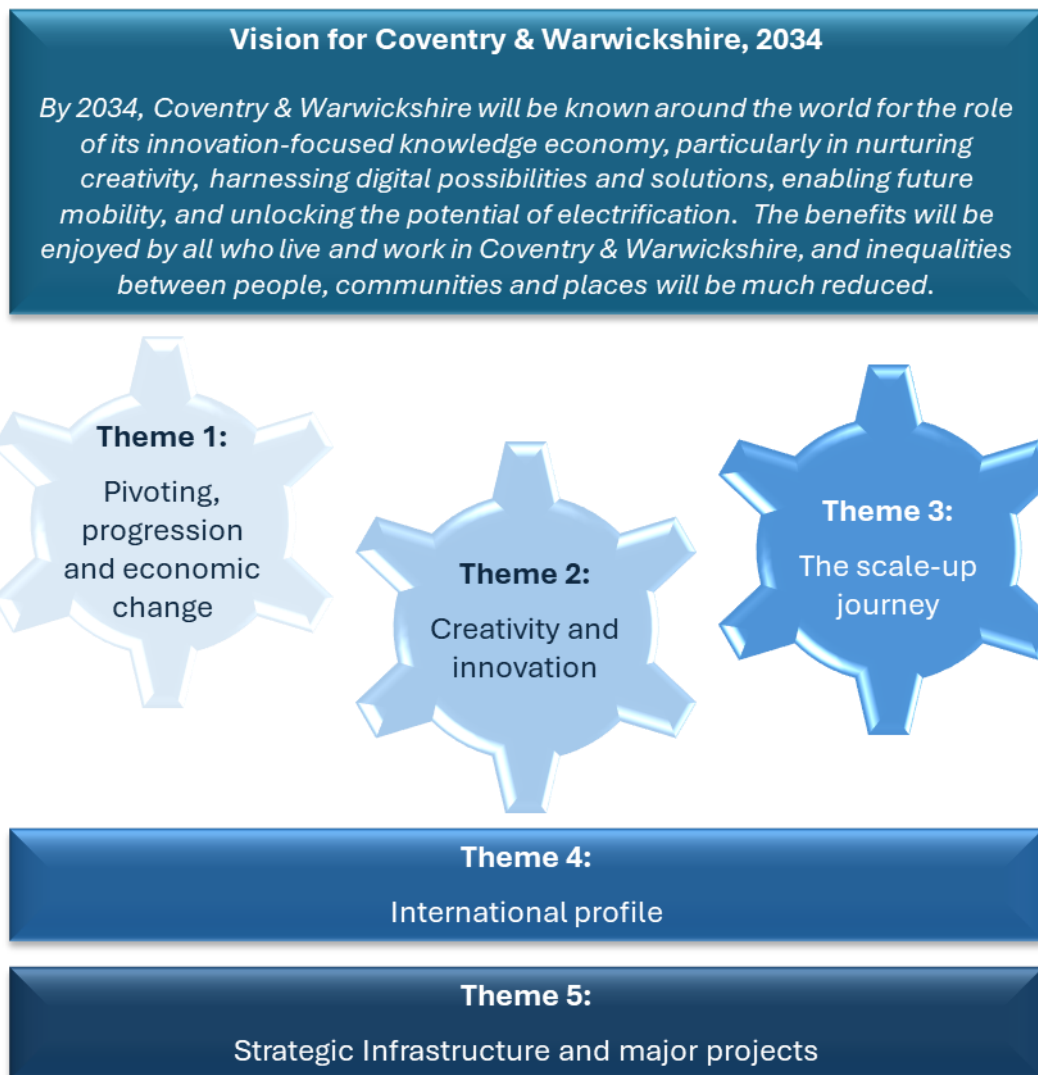
The five Themes have been defined because they are **sub-regionally relevant and appropriate**. They are also **strongly inter-related and synergistic**.

They have been defined in order to:

- provide **flexibility and agility** in the context of risk and uncertainty (politically, economically, institutionally)
- distil the core of **what Coventry & Warwickshire needs to 'do'** (given the area's assets, opportunities and challenges)
- be **appropriate at a sub-national scale** (given the raft of strategies and plans at both larger and smaller spatial scales)
- allow **real progress to be made** in pursuit of the Vision.

The **Vision** and **five Themes** together provide a **Strategic Economic Framework** for Coventry & Warwickshire. This is summarised in the graphic below and explained in the remainder of this document.

Figure 5-1: Strategic Economic Framework for Coventry & Warwickshire



6. Theme 1 – Responding to economic change

Summarising Theme 1

Theme 1 is concerned with supporting and investing in a profound process of industrial restructuring across Coventry & Warwickshire – linking to both specific transitions (notably electrification at the core of automotive and aerospace) but also more general processes of industrial change driven by autonomy and automation, AI, etc.

Businesses and sectors will need to modernise and adapt if they are to take advantage of new market opportunities. In parallel, people and communities will need to be equipped to respond.

In many other local economies, the scale of transformation is such that it could have been catastrophic. However Coventry & Warwickshire has so far appeared to be reasonably resilient.

In part this is because new businesses and sectors are emerging (see Themes 2 and 3) and in part it is because major businesses and organisations in the area have actually been at the vanguard of industrial change – through for example technologies linked to electric vehicles, batteries and battery storage, hydrogen vehicles, low energy mass transport solutions (e.g. Coventry Very Light Rail (CVLR)), and renewable energy production. Further, the area has invested (or is investing) in specific ventures to realise the associated opportunities and mitigate the surrounding risks (see Box 6-1).

Rationale

Coventry & Warwickshire is experiencing significant economic change. This involves both sectoral shifts and major developments within existing key sectors, notably automotive and future mobility (including aerospace and other vehicle engineering and advanced manufacturing more generally). An industrial revolution is ongoing, precipitated by regulatory and technological change, and particularly the shift towards autonomy and electrification: major businesses and their supply chains are literally being re-engineered in the context.

Box 6-1: Key assets and investments in Coventry & Warwickshire linked to electrification and the future of mobility

UK Battery Industrialisation Centre (UKBIC) officially opened in 2021. It is a first-of-a-kind battery manufacturing scale-up facility and is funded in part by the UK government Faraday Initiative. It provides the space and skills for the UK's growing battery sector. It hosts a range of specialist manufacturing equipment installed for the benefit of UK industry.

Located on the boundary between Coventry and Warwick (district), **Greenpower Park**, will be a location for

battery research, industrialisation, manufacturing, testing, recycling and electrified logistics on the outskirts of Coventry. The factory will bring together global battery manufacturers; it is the only available site in the UK within an investment zone and with planning permission for a large-scale battery manufacturing facility. Greenpower Park is located within the **Coventry & Warwick Gigapark**, part of the **West Midlands Investment Zone**. This provides further incentives (e.g. tax reliefs) to encourage investment into this location.

MIRA Technology Park is the leading UK vehicle test and development facility, and home to more than 40 major OEM companies (including Bosch, JLR, Polestar and Toyota). The Park is one of Europe's leading mobility R&D locations for automotive technology, with a focus on Connected and Autonomous Mobility and vehicle propulsion systems (including battery electric and hydrogen). The campus includes MIRA Technology Institute (MTI) (a specialist facility to train engineers both onsite and in the local area) and MIRA South Site (a high-quality, masterplan development incorporating 2.3m sq ft of large scale manufacturing and industrial facilities, to support the 2m sq ft of existing space and permission on the park for R&D activity).

National Transport Design Centre (connected to Coventry University) is a Centre that focuses on exploring the future of transport design, bringing together a cross-disciplinary group of individuals/academics to research future transport ideas.

Long Marston Rail Innovation Centre provides rail infrastructure, testing infrastructure and innovation space to develop new railway technologies, many of which aim to reduce emissions associated with the railways.

Jaguar Land Rover's Future Energy Lab is a state-of-the-art electric vehicle test facility, which will support JLR in launching nine electric models by 2030.

The **JLR Product Creation Centre** at Gaydon is home for almost 13,000 designers, engineers, procurement and related staff. Alongside the JLR Future Energy Lab and NAIC in Coventry, it will drive the development of global vehicle creation and related technology for JLR.

The **National Automotive Innovation Centre (NAIC)** is the flagship 150,000 sq ft facility at the WMG Campus at the University of Warwick. It brings academics together with engineers from JLR, TATA and TVS (among other OEMs) to research and develop new technologies around vehicle propulsion, light weighting, cyber technology and autonomy in vehicles.

The process of re-inventing large swathes of the economy inevitably creates losers as well as winners. It has been (and will be) extremely challenging for some businesses, people, communities and places. There is therefore a need to recognise the scale of upheaval and to put appropriate measures in place – through training and upskilling, enterprise support, access to capital and through effective connections to new employment opportunities.

Fit with strategic priorities regionally/nationally – and locally

Although it relates to only part of the area, the **West Midlands Plan for Growth** (like the earlier West Midlands Local Industrial Strategy) identifies the ongoing structural shift driven by electrification as one of the key challenges facing the West Midlands. In response, it identifies a series of clusters that might drive forward the region's economic future. These are relatively well represented across Coventry & Warwickshire.

The **West Midlands and Warwickshire Local Skills Improvement Plan (LSIP)** identifies the importance of transitioning to new technologies within existing sectors. The LSIP identifies the engineering and manufacturing, construction, ICT and digital, and logistics and distribution sectors as being the most critical for the future, with a need to develop current and future green skills needs, and develop more digital skills needed by businesses to support their growth aspirations.

The **West Midlands Electric Vehicle Inward Investment Strategy** has been developed to support investment into Coventry & Warwick Gigapark. It is also designed to support the sustainability and growth of the wider auto sector, including sites locally like University of Warwick Innovation Campus at Wellesbourne, and MIRA South Site expansion.

Priority Interventions

In advancing Theme 1, partners across Coventry & Warwickshire will seek to:

- **facilitate (and sustain) a Coventry & Warwickshire-specific dialogue between businesses and training providers**, to ensure that skills provision continues to be aligned with changing business needs.
- **invest in skills and workforce development**, recognising that jobs are changing rapidly and there is a need to plan for roles that do not yet exist and respond to significant skills shortages/gaps.
- **build digital skills across Coventry & Warwickshire** – to ensure that everyone has a basic digital literacy, but also start developing more advanced digital skills to support business needs.
- **put in place relevant and innovative business support** that bolsters national products and key regional and national networks to help businesses manage the transition. This could include:
 - packages of support for enterprises seeing major changes in their operating environment
 - packages of support linked to SMEs' transition to net zero carbon
 - packages to drive innovation across the area, to enable and support growth and diversification.
- **instigate local transport measures** to ensure that those in more deprived areas across Coventry &

Warwickshire are fully able to access emerging opportunities.

- **recognise and identify those who are at risk of socio-economic**

exclusion as a result of technological/regulatory change and put in place measures to support them (linked especially to skills and training).

7. Theme 2 – Creativity and innovation

Summarising Theme 2

Theme 2 is defined around processes of creativity and innovation. While Coventry & Warwickshire already has clear strengths, there is much more that could be achieved. Theme 2 is intrinsically cross-cutting and cross-sectoral, and the aim is to encourage creativity and innovation across the board, including through tacit forms of knowledge exchange. The wider innovation ecosystem has a role to play in this context, but Theme 2 needs to be understood more broadly. Theme 2 is concerned with cultural and attitudinal dimensions of creativity and innovation – and the benefits that could follow.

video games development cluster and other digital creative companies in and around Leamington, and the skills and knowhow that comes with them. There is also a clear read-across to advanced engineering, and there is plenty of evidence of a rich cross-fertilisation taking place. As these two specialisms come together more consistently, the scope for innovation ought to be spectacular.

But Theme 2 is actually much broader. Its focus is system-level creativity and innovation. Coventry & Warwickshire needs to be a place where more people and more businesses have the confidence and the wherewithal ‘to try’. Sometimes they will fail, but this is the route to learning and the wider environment needs to be enabling and encouraging in this context.

Rationale

The nature of value creation is changing: both creativity and innovation need to be pervasive and cross-cutting, underpinned by effective processes of knowledge exchange.

Coventry & Warwickshire has real strengths in relation to creativity and innovation. It has a long history in innovation, including the birth of the modern bicycle, the motor car and aerospace propulsion. It is already recognised as a creative and innovative place. This has tangible expression in the digital creative space in the form of the

Coventry & Warwickshire needs to be a place where chance encounters lead to new and better business activity. The area is at the heart of England and in this sense, it is a natural meeting place. This needs to translate into an evolving culture of, and appetite for, creativity and innovation, particularly among new entrepreneurs.

The wider innovation ecosystem has a role to play in this context. It is important partly because it is linked to the management of risk, and it needs to continue to develop and mature. The recently established Warwick Innovation District (established by the University of

Warwick) is part of this, as are various organisations initiated by Coventry University.

There are already good examples of best practice. One example is the work of 1 Mill Street in providing a sustainable focus for the digital creative community in the south of the county. Another is the work of HORIBA MIRA and WMG in bringing together a future mobility version of the Plug and Play concept to the local area.

Theme 2 needs to be seen, fundamentally as ‘innovation and creativity *in place*’. It is therefore relevant to *both* those who call Coventry & Warwickshire home but who work elsewhere; and to entrepreneurs who are setting up new businesses locally. It is about a culture of innovation and enterprise – and the wide range of outcomes and impacts that might follow.

Fit with strategic priorities regionally/nationally – and locally

Whilst Theme 2 is not sector-specific, there are clear links to some sector-specific statements – such as the **Creative industries sector vision: a joint plan to drive growth, build talent and develop skills** which was developed nationally (by the previous government).

Drawing these strands together, there is likely to be a strong crossover with the **Modern Industrial Strategy** which is being developed by the new government. It is likely to include a growing recognition of the links between innovation and place. Creativity and innovation happens in places – and therefore alongside

investment in R&D, many different factors play their part – including the effectiveness of local labour markets; the availability of local sources of equity investment; the provision of specialist property.

At a regional level, the **West Midlands Plan for Growth** has aspirations to develop a region where innovation flourishes. The **West Midlands Innovation Accelerator** is a key venture in this context.

Locally, the **Coventry & Warwickshire Launchpad** – which is focused on immersive technologies and creative industries – is aligned fully with the ambitions and encompassed by Theme 2. At its core is a recognition of the importance of clustering. It highlights the role that local universities and local authorities can play in directing national funding and support to the local area. As the Launchpad is delivered, it will be important that appropriate learning takes place.

Priority Interventions

In advancing Theme 2, partners across Coventry & Warwickshire will seek to:

- **put in place mechanisms to learn from the Coventry & Warwickshire Launchpad**, and to disseminate the findings quickly at a local level.
- **develop measures to ‘engineer serendipity’ (i.e. chance encounters) between sectoral specialisms in a place setting**; in practice, this means creating conditions in which ‘chance

meetings' across disciplines, sectors and technologies are more likely to happen (e.g. through sandpits and the like).

- **encourage creativity and innovation at a local level** – through stronger local hubs (including in town centres), which can support the sharing of ideas amongst smaller businesses and those living and working in more remote locations of Coventry & Warwickshire.
- **recognise the significance of freelancers** – who are a key part of creative sectors yet often are isolated

and with a slightly precarious existence – and find ways of supporting them. This could be by offering bespoke training or work experience opportunities.

- **encourage the development of networks**, both locally (e.g. town level and across rural areas) and across Coventry & Warwickshire as a whole.
- **promote Coventry & Warwickshire as a place known for creativity and innovation** in dialogue with the two universities and wider cultural, creative and research institutions.

8. Theme 3 – The scale-up journey

Summarising Theme 3

Alongside Themes 1 and 2, Theme 3 links to the effectiveness of the wider innovation ecosystem, but the focus is on systemic barriers to scale-up – which is a major challenge for Coventry & Warwickshire.

Theme 3 assumes a high level of creative entrepreneurship and that start-up businesses – of many different forms – are in place; the challenge is unlocking their growth. This requires a particular set of intervention priorities, but it is important both in effecting sustainable economic growth and building the resilience of Coventry & Warwickshire as a whole.

Rationale

Coventry & Warwickshire has outstanding research and innovation assets (through its universities, businesses and research organisations), and it is producing new enterprises. But the evidence points to sluggishness in the growth process – such that despite its assets, Coventry & Warwickshire is one of the worst performing areas nationally in respect to the process of scale-up.

Coventry & Warwickshire has major businesses. For the most part, these are long established and they are playing key roles as anchor institutions through their supply chains and through the training

and knowledge transfer they provide. However this brings with it vulnerabilities too, particularly as technologies change (as explored through Theme 1). What Coventry & Warwickshire lacks is the unicorns that other knowledge economies can claim. In this respect, it is some way adrift. Logically, there is no shortage of possibilities, but realising the associated potential is proving challenging and there is widespread recognition that it needs to be a focus for the sub-region looking ahead.

In practice, many different factors are at play – including access to skills/knowledge, space, leadership and management skills, and finance; and the particular requirements of the area's key sectors. Addressing these issues is the focus for Theme 3.

Fit with strategic priorities regionally/nationally – and locally

A **Modern Industrial Strategy** is being developed by the Labour government. Whilst focused on key sectors/clusters, this is also likely to emphasise the importance of scale-up businesses.

Although it does not relate to the whole of Coventry & Warwickshire, the development of a vibrant innovation and scale-up ecosystem is a priority for the West Midlands Combined Authority. WMCA's **Plan for Growth** signals much continuity with the earlier Local Industrial Strategy for the West Midlands, and with various Strategic Economic Plans

(including that for Coventry & Warwickshire which was developed by the former Local Enterprise Partnership).

Within this context there is a particular commitment to the **West Midlands Innovation Accelerator**, overseen by West Midlands Innovation Board. This is a core part of the Deeper Devolution Deal (March 2023). It will accelerate investment in *‘applied and translational research to spark commercial growth and bolster the region’s R&D capability and capacity’*.

Priority Interventions

In advancing Theme 3, partners across Coventry & Warwickshire will seek to:

- **identify high growth businesses in Coventry & Warwickshire and sustain an active dialogue with them** to understand and to help navigate particular challenges (e.g. linked to recruitment, commercial property and/or planning issues, securing finance, etc.).
- **put in place mentoring and coaching support for those seeking to grow businesses** after the initial start-up phase.
- **develop an appropriate sites strategy**, with a focus on ‘grow on’ space and a commitment to use existing sites well. Partners must look to use direct and indirect powers and resources to encourage the provision of grow-on space within new developments and through the redevelopment of existing employment sites.
- **work with public and private sector partners to improve access to finance and build investor confidence to invest in scale-up businesses**. This will include building/supporting Midlands Mindforge in expanding its activities in the region, helping to accelerate and enhance the commercialisation of science and technology innovations from local universities.
- **develop sector-based Accelerators focused on emerging specialisms within Coventry & Warwickshire**, focusing firstly on those sectors with the greatest potential in the area (including those identified by Coventry City Council and Warwickshire County Council in their growth plans (and similar documents); those identified within the West Midlands Plan for Growth; and those highlighted within the Modern Industrial Strategy Green Paper (and eventually the White Paper)).
- **actively promote the the area for scale-up businesses** through marketing and other activities (linking with Theme 4).

9. Theme 4 – International profile

Summarising Theme 4

Theme 4 underpins Themes 1-3 and is concerned with Coventry & Warwickshire's 'place in the world'.

The area has many world-class assets and sectoral specialisms built up over many decades, and these have a global reach – including through international students.

Coventry & Warwickshire is already a leading inward investment destination; on a per capita basis, it is the leading geography in the UK according to recent national government data. Looking ahead, its growth opportunities need to be global. International trade and export has become more difficult in recent years, but requires support to both SMEs and UK branches of global companies.

The focus on international profile also means promoting and growing the area's visitor economy offer to international leisure and business tourists.

Rationale

Coventry & Warwickshire has assets of international significance. These range from academic institutions to major tourism attractions to internationally recognised businesses which are addressing global challenges.

International connections are already important to the local area, but they need to be nurtured further. There are many different reasons for this.

One factor is that the national market arguably lacks scale given the level of investment into key new technological advances (such as electric vehicle and battery technologies which are very important for Coventry & Warwickshire). The businesses and organisations that are operating in these spheres need access to global collaborators and global investors. For the businesses, global markets are similarly important and they need quickly to become part of international supply chains.

Box 4-1: The global transition to electric vehicles – and the opportunity for Coventry & Warwickshire

Nationally, the zero emission vehicle (ZEV) mandate became law in January 2024. It means that 80% of new cars and 70% of new vans sold in Great Britain will be zero emission by 2030, increasing to 100% by 2035. The transition however is challenging and in autumn 2024, it was reported that details of the ZEV mandate may be reviewed.

The transition, however, is global. The UK's timeframe is replicated across other major economies (including France, Germany and Sweden). In the USA, there is a target for 56% of all new vehicles sold to be electric by 2032 (BBC News website, 20.03.24); although slower than

elsewhere, this still represents a substantial transition.

Within this context, the worldwide commercial opportunity is enormous and the stakes are very high indeed – particularly in a year of general elections. Currently, this is translating into friction surrounding international trade and, specifically, tariffs on electric vehicles. Meanwhile major automotive companies are shifting their production locations in order to avoid tariff barriers. The global industry is therefore very fluid. Activities in Coventry & Warwickshire are fully part of this wider narrative, with the opportunities and threats afforded by it.

For similar reasons, there is a strong case for seeking to attract more inward investment.

Locally, Invest Coventry & Warwickshire works with partners to promote key sectors and provide soft-landing support to investors. Looking ahead, public and private partners should continue to work together to attract new UK and overseas investment to support the occupancy of new commercial office and industrial space coming onto the market, including new development at Coventry & Warwick Gigapark and MIRA South Site.

Both the University of Warwick and Coventry University attract thousands of international students into the area, although many of these also leave after graduation. UK government policy in relation to migration is a factor here

¹⁰ See [New Government drives forward trade talks to turbocharge economic growth - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-government-drives-forward-trade-talks-to-turbocharge-economic-growth) July 2024

(particularly in respect of the families of international students). However retaining more of these students after graduation would help in terms of augmenting the area’s skills base (which is very important in respect of Themes 1, 2 and 3).

The area attracts millions of visitors each year to the likes of Stratford-upon-Avon and Warwick Castle, but international tourism numbers have not yet returned to pre-pandemic levels. The new Coventry & Warwickshire Destination Partnership should help to articulate and promote the wider offer; it is important that this reaches international visitors too.

Fit with strategic priorities regionally/nationally – and locally

Rebuilding the UK’s role in the world – post-Brexit and post-pandemic – is a clear national priority. UK government has plans to **publish a new trade strategy** which will align with the forthcoming **Modern Industrial Strategy**; this will also enhance the UK’s economic security and support its net zero ambitions. The new trade strategy should help to reset the UK’s relationships with the EU, support more small businesses to export and remove unnecessary barriers to trade¹⁰. There is a real opportunity for Coventry & Warwickshire to make a key contribution.

Locally, **Invest Coventry & Warwickshire** is already showcasing the assets and ‘investibility’ of the area, with its ‘*Be Here...*’ branding and a focus on key

sectors (automotive and future mobility; digital creative and video games; and business, professional and financial services). The Invest Coventry & Warwickshire website and ‘Be Here...’ inward investment brochure highlight the many strengths of the area and provide a focal point for those interested in setting up in the city and county.

Priority Interventions

In advancing Theme 4, partners across Coventry & Warwickshire will seek to:

- **support international collaborations and actively encourage international business tourism.**
- **continue to develop materials for targeted inward investment marketing.** These might focus on:
 - the EV and battery inward investment opportunity
 - cultural and creative assets and opportunities (including heritage and the visitor economy)
 - Coventry & Warwick Gigapark, and Greenpower Park
- the local sustainability and ESG offer
- the benefits of Coventry & Warwickshire at the heart of the UK.
- **support businesses in Coventry & Warwickshire which are seeking to trade internationally**, helping them to overcome regulatory and trade barriers.
- **attract and welcome international visitors to Coventry & Warwickshire**, and promote the Visitor Economy more generally.
- **recognise the large numbers of international students at both Coventry University and University of Warwick and equip them to be ‘area ambassadors’ over the long term:** helping them to ‘understand this place’ might create alumni networks through which the strengths of Coventry & Warwickshire are articulated and shared around the world.

10. Theme 5 – Strategic Infrastructure and major projects

Summarising Theme 5

As a foundation of Themes 1-4, the fifth and final Theme is concerned with infrastructure and major projects. Within Coventry & Warwickshire, sustainable economic growth will require infrastructure investment. Some of this is already underway – but progress needs to be sustained and accelerated. In other cases, there is research to be done, business cases to develop, and funding to be secured. Priorities need to be agreed in line with the Economic Strategy, and then driven forward. More generally, there is a need to research and implement new policy and approaches, and to bring forward new development opportunities if the area's growth is to be realised fully.

Rationale

Within Coventry & Warwickshire, there are already major infrastructure initiatives and projects – but these are complicated, long term, dependent on national government (and sometimes WMCA) priorities (which can change – as has been seen in relation to HS2). Although there have been some major successes in recent years, some critical projects have

proceeded slowly, which has challenged the credibility of the area to deliver.

The **transport infrastructure** across Coventry & Warwickshire is regularly mentioned by businesses as a major constraint. It affects access to workers, and it can constrain the functioning of supply chains.

The **availability of employment space** is also frequently cited as a major barrier to business growth, hindering expansion plans and impacting on the local economy¹¹. There are currently major existing development sites for industrial uses, and others in the pipeline, but these have not always delivered the mix of space required, particularly for SMEs. Quality grade A office space has been in short supply in some locations.

In addition – as discussed in Chapter 3 – there are **constraints and challenges linked to a wide range of other infrastructures**. These include the supply of both energy and water, but also issues linked to social infrastructure (provision for hospitals, schools, GP surgeries, etc., given population growth).

Beyond the immediate area, the changed circumstances of HS2 present both an opportunity and threat for Coventry & Warwickshire.

¹¹ Employment Land Report, Coventry & Warwickshire Chamber of Commerce, 2023

Fit with strategic priorities regionally/nationally – and locally

The Labour government is committed to economic growth, and the delivery of infrastructure is a key element of this. The new National Wealth Fund should have an important role to play in this context.

In its manifesto it commits to a **new 10-year infrastructure strategy** to guide investment and provide certainty about the project pipeline. It has also indicated that this will be aligned with the new Modern Industrial Strategy and also be cognisant of regional development priorities. In practice, much of it will be linked to the journey of devolution.

For Coventry & Warwickshire, there are two **devolution journeys** at work – one at Level 2 currently and the second focused on deeper devolution (Level 4). The latter brings with it an investment fund that needs to respond to infrastructure (and other) priorities. It will be important that these are articulated clearly given the different boundaries and jurisdictions. Alignment between the requirements of the Coventry & Warwickshire Economic Strategy and Coventry City Council's Place-Based Strategy will also be important.

Priority Interventions

In advancing Theme 5, partners across Coventry & Warwickshire will seek to:

- **promote and advance both the Greenpower Park (the location of the West Midlands Gigafactory) and the wider Coventry and Warwick**

Gigapark, recognising the key roles of both within the regional economy.

- **promote and advance similar net zero future mobility opportunity sites** at MIRA South Site and University of Warwick Innovation Campus, Stratford-on-Avon.
- **continue to progress long term schemes and extract social/economic impacts from them.** Examples include: Coventry City Centre South/Friargate; and Transforming Leamington.
- **develop an 'economy first' approach to identifying and promoting strategic sites**, linking them to Themes in this strategy – particularly the emergence of new economic sectors and encouraging the provision of space for manufacturing as well as e-commerce and logistics, and the provision of space suitable for SMEs.
- **continue to improve the area's strategic transport infrastructure**, recognising the importance of links across Coventry & Warwickshire but also those into neighbouring counties and the West Midlands Combined Authority area.
- Encourage a reassessment of the position on **HS2**.
- **ensure that all places and all people within Coventry & Warwickshire have access to an outstanding digital infrastructure** – and the skills and confidence to use it fully.

- **encourage investment in the infrastructure which is critical for growth** (energy, water, waste), taking note of the constraints that are identified currently.
- **recognise the importance of green infrastructure**, and ensure that it is valued and used.

11. Delivering the Economic Strategy

This Economic Strategy sets out a bold and fresh Vision for Coventry & Warwickshire. It seeks to achieve this through the delivery of five key Themes.

A shared endeavour

In advancing the Economic Strategy there is no ‘silver bullet’, nor a significant funding stream to be harnessed and used.

However, Coventry City Council and Warwickshire County Council are committed to working together – building on a long track record of successful joint working. They are also committed to working with the districts and boroughs in Warwickshire.

Core to this will be an ongoing dialogue and a commitment to sharing new evidence and insight as these become available. There is already positive and strong stakeholder engagement across the area, including through the *Coventry and Warwickshire Growth Hub*, *Coventry and Warwickshire Champions*, *Coventry and Warwickshire Chamber of Commerce*, *Invest Coventry & Warwickshire*, the *Federation of Small Businesses*, *Coventry & Warwickshire First* and the recently-established *Coventry & Warwickshire Destination Partnership*.

Working with the business community and with key organisations

The strategy has been advanced because it ‘makes sense’ for Coventry & Warwickshire as a whole, particularly in

relation to key sectors and clusters, and the innovation and creativity associated with them. In this context, the two upper tier authorities will engage actively with the business community in driving key elements of the strategy forward. It will also work closely with the area’s universities and its cultural, creative and research organisations.

Developing strategic relationships

The two upper tier authorities will align their own activities behind the strategy wherever it is possible to do so – noting that delivery will rely on a lot of ‘influencing’ and shaping mainstream processes. At the same time, each Council will pursue local priorities too as set out in county- and city-level strategies and plans; these have a particular focus on different aspects of employability and inclusion (which need to be advanced as a matter of urgency).

The delivery of this Strategy will rely on developing strong working relationships with others. This includes the West Midlands Combined Authority, neighbouring upper tier authorities and the new government. This will be key to making the case and unlocking investment to deliver many of the interventions identified. In particular new funding opportunities linked to the new National Wealth Fund should be explored (including the proposed allocations towards gigafactories).

If opportunities do emerge, the two upper tier authorities will engage jointly in a dialogue with central government and bid for funding support. Much of this strategy could, for example, be advanced through (something like) a Strength in Places fund programme, if such a scheme was to be launched.

Delivering this Strategy for local people and communities

Whilst this Economic Strategy must deliver economic growth for Coventry & Warwickshire, it should also ensure that all people and communities (both rural and urban) across the area are able to

benefit as investment is unlocked. All projects and interventions delivered as part of this Strategy have local communities in mind. Where relevant, this will mean:

- **consulting with communities (including through districts and boroughs)** to identify the most effective/appropriate ways to intervene locally.
- **delivering social value** throughout, ensuring that those investing locally create supply chain, employment and learning opportunities for local people.



Cabinet
Council

18 March 2025
25 March 2025

Name of Cabinet Members:

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

Director approving submission of the report:

Director of Regeneration and Economy

Ward(s) affected:

All

Title:

West Midlands Combined Authority Grant Funding to Coventry 2025/26

Is this a key decision?

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

Executive summary:

The West Midlands Trailblazer Deeper Devolution Deal (the Deal) was:

- Agreed in principle by the West Midlands Combined Authority (WMCA) Mayor and Portfolio Leaders on 10 March 2023.
- Announced in the Chancellor's Budget on 15 March 2023, and
- Adopted by Coventry City Council (the City Council) on 17 October 2023.

One of the flagship announcements within the Deal was for the West Midlands to have a Single Settlement, whereby instead of being funded through 50+ individual grants, the WMCA would be funded by a single funding settlement covering a full Spending Review period. This has since been rebranded as an "Integrated Settlement", and this report seeks approval to accept the first rounds of funding for Coventry through the Integrated Settlement.

Integrated Settlement Funding

The Integrated Settlement covers five Pillars. We are expecting a total of £19.44m to be awarded to the City Council through the first round of funding (£10.971m of which will be revenue funding and £8.469m capital funding), although there may be potential for additional in year funds in the event of strong performance or underspends elsewhere in the region. The Integrated Settlement funding being awarded to the City Council is summarised below:

- **Pillar 1: Local Growth & Place.** The City Council is expected to be allocated £4.65m of funds (£3.761m revenue and £0.889m capital) through the UK Shared Prosperity Fund for 2025/26 to deliver the City Council's business support and grants and Job Shop "Hub & Spoke" services.
- **Pillar 2: Adult Skills & Employment Support.** The City Council expects to be awarded £6.27m of revenue funding, of which £5.52m will be from the Adult Education Budget (AEB), and up to £0.75m from the Connect to Work fund to tackle physical and mental health barriers to employment.
- **Pillar 3: Retrofit & Net Zero.** The City Council expects to be awarded £8.52m (£0.94m revenue and £7.58m capital) across two funds to improve the energy efficiency of private housing stock and the public estate. Coventry based Registered Providers will also receive a share of the region-wide budget for the Warm Homes Social Housing Fund.
- **Pillar 4: Local Transport.** For 2025/26, much of the core transport funding for the City Council will be dealt with outside the Integrated Settlement, notably the City Region Sustainable Transport Settlement (CRSTS), and recommendations to approve acceptance of Transport Capital funding are covered in the Transport Capital Programme Cabinet Report to be tabled at this same meeting. Much of the Transport funding through the Integrated Settlement (notably focusing on bus services) will be managed by Transport for West Midlands (TfWM).
- **Pillar 5: Housing & Regeneration.** Continuation of WMCA's Brownfield Land & Infrastructure Fund, Brownfield Housing Fund, and Brownfield Land Release Fund. This funding will remain open for developers to apply for, and we do not expect the City Council to receive funding directly from this Pillar.

The WMCA will be the Accountable Body for the Integrated Settlement, and for each Pillar, it will be bound by outcome indicators, to be agreed with government. The funding that we are seeking acceptance for is being passported to the City Council, and in awarding this money, WMCA will pass delivery risk to the City Council through formal legal Grant Aid Agreements.

The City Council and other Constituent Authorities have challenged WMCA on the amount of funding that is being topsliced and retained for regional management and coordination functions. Should further funding become available as a result of reduction in WMCA central topslicing, this report requests delegated authority to accept such additional funding.

Business Energy Assessment Service Funding

On top of the UKSPF funding, the City Council is also expecting to receive up to £2.5m in 2025/26 (£0.8m revenue and £1.7m capital) from the Department for Energy Security and Net Zero (DESNZ) funded Business Energy Assessment Service (BEAS). This is an extension to the Pilot that has been running since April 2024 to deliver free Energy Efficiency Audits, continue the Green Business Network and provide capital grants to help local businesses save money on energy bills and advance their path to net zero.

This report requests authority to accept WMCA's expected allocation to Coventry City Council of up to £19.44m of Integrated Settlement and Business Energy Assessment Service money of up to £2.5m to deliver these activities, together with delegated authority to enter into funding agreements with funders and thereafter back-to-back contracts with delivery partners, where necessary, to complete this work.

Recommendations:

Cabinet is asked to recommend that Council:

(1) Approve the acceptance of up to £21.94m made up of the following:

- a) WMCA's Integrated Settlement Funding allocation for 2025/26 to Coventry from WMCA for up to £19.44m, split between £10.971m of revenue funding and £8.469m of capital funding, and
- b) Business Energy Assessment Service Funding allocation for 2025/26 to Coventry from Department for Energy Security & Net Zero for up to £2.5m split between £0.8m of revenue funding and £1.7m of capital funding

with the capital funding element set out above being added to the City Council's Capital Programme.

(2) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance, and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including:

- a) Securing any match funding requirement; and
- b) Entering into the appropriate funding agreements with the relevant funding body.

(3) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance and the relevant Cabinet Member(s) to enter into back-to-back contracts with delivery partners as deemed necessary to bring into effect the recommendations set out in this report.

- (4) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance and the relevant Cabinet Member(s) to:
- a) Accept any additional funding which is made available to Coventry through the Integrated Settlement during 2025/26 and subsequent years 2026/27 and 2027/28, and
 - b) Undertake all necessary due diligence in relation to any of the additional funding made available, including the authority to enter into funding agreements with the WMCA, and entry into back-to-back contracts with partners as deemed necessary.

Council is recommended to:

- (1) Approve the acceptance of up to £21.94m made up of the following:
- a) WMCA's Integrated Settlement Funding allocation for 2025/26 to Coventry from WMCA for up to £19.44m, split between £10.971m of revenue funding and £8.469m of capital funding, and
 - b) Business Energy Assessment Service Funding allocation for 2025/26 to Coventry from Department for Energy Security & Net Zero for up to £2.5m split between £0.8m of revenue funding and £1.7m of capital funding
- with the capital funding element set out above being added to the City Council's Capital Programme.
- (2) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance, and the relevant Cabinet Member(s), to undertake all necessary due diligence in relation to the funding allocation including:
- a) Securing any match funding requirement; and
 - b) Entering into the appropriate funding agreements with the relevant funding body.
- (3) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance and the relevant Cabinet Member(s) to enter into back-to-back contracts with delivery partners as deemed necessary to bring into effect the recommendations set out in this report.
- (4) Grant delegated authority to the Director for Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance and the relevant Cabinet Member(s) to:

- a) Accept any additional funding which is made available to Coventry through the Integrated Settlement during 2025/26 and subsequent years 2026/27 and 2027/28, and
- b) Undertake all necessary due diligence in relation to any of the additional funding made available, including the authority to enter into funding agreements with the WMCA, and entry into back-to-back contracts with partners as deemed necessary.

List of Appendices included:

None

Background papers:

West Midlands Combined Authority Trailblazer [Deeper Devolution Deal \(2023\)](#):

[Memorandum of Understanding](#) for Single Settlements (now Integrated Settlements) with WMCA and Greater Manchester Combined Authorities (November 2023)

Overall West Midlands Combined Authority [Integrated Settlement for 2025/26](#):

Other useful documents

None

Has it or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

Yes - 25 March 2025

Report title: West Midlands Combined Authority Grant Funding to Coventry 2025/26

1. Context (or background)

- 1.1. In 2016, Coventry City Council joined the West Midlands Combined Authority (WMCA), along with Birmingham City Council, Solihull Metropolitan Borough Council, Dudley Metropolitan Borough Council, Sandwell Metropolitan Borough Council, Walsall Council and Wolverhampton City Council. Forming the WMCA allowed the seven constituent authorities to seek devolved funding and powers from Government.
- 1.2. The first “devolution deal”, an agreement between WMCA, Constituent Members and Government setting out which responsibilities would be devolved to the region, was agreed in 2015 in preparation for the formal establishment of the WMCA the following year. This gave the WMCA the responsibility for a devolved transport budget, devolved adult skills funding, and provided funding to establish the WMCA Investment Programme to finance major capital projects including City Centre South. The second Devolution Deal followed in 2017, which provided the establishment of the then West Midlands Industrial Strategy.
- 1.3. The WMCA, along with Greater Manchester Combined Authority, was then awarded a third Devolution Deal in March 2023 (the Trailblazer Deeper Devolution Deal). As well as 10 years of Business Rates Retention, £100m for a Single Regeneration Fund, a new Affordable Housing Programme, and additional funding to further pilot 5G-led solutions to challenges in the health & social care sector, one of the flagship announcements within this latest Devolution Deal was that WMCA would receive a “Single Settlement”, later rebranded as an “Integrated Settlement”, which would provide a single funding stream for all funding coming into the region within the five Pillars of Local Growth & Place, Adult Skills, Retrofit & Net Zero, Local Transport and Housing Regeneration, rather than the previous 50+ different funding streams.
- 1.4. Since the latest Devolution Deal was adopted by the 7 WMCA Constituent Authorities in 2023, WMCA has been liaising with government over which funds will form part of the Integrated Settlement and priority outcomes. The total value of funds available started to become clear in December 2024, with some funds being passported to Local Authorities, some funds being directed towards WMCA and Transport for West Midlands (TfWM) functions, and some being directed to third parties, and some that will be allocated to developers through successful bids to the Housing & Regeneration funds.
- 1.5. This report focuses on the funding that will be awarded to the City Council and seeks approval for the City Council to accept the Integrated Settlement funding and funding for the Business Energy Assessment Service. Approval is sought for a total of £21.94m of funding (£11.771m of revenue funding and £10.169m of capital funding), which represents the current expected values of funds expected to be passported to the City Council. Delegated Authority is also sought for the Director of Regeneration and Economy, following consultation with the Director of Finance and Resources, the Director of Law and Governance Chief Legal Officer and the relevant Cabinet Member(s) to accept any additional Integrated Settlement funds that are allocated to Coventry during 2025/26 and subsequent years 2026/27 and 2027/28, for example

due to underspends in other parts of the region or changes in funding priorities. The funding acceptance of is detailed in the sections below.

Integrated Settlement Funding

- 1.6. **Pillar 1: Local Growth & Place.** The City Council is expected to be allocated £4.65m of funds through the UK Shared Prosperity Fund (UKSPF) *for 2025/26*, of which £3.761m is expected to be revenue funding and £0.889m capital funding. This forms part of the £46,463,600 overall allocation awarded to WMCA. This covers the one-year extension that the Government has granted to UKSPF, following the first tranche of funding between April 2022 and March 2025. The funding for the City Council for 2025/26 will cover four key elements, which focus on similar thematic areas to the first tranche of funding:
 - 1.6.1. The funding of Business Advisors within the City Council and a Capital Grants fund to provide advice, support and finance to enable Coventry businesses to grow, diversify and innovate through the Local Business Investment Priority, as well as specialist services to be delivered by key local partners that will support new start-ups and the development of social enterprises. This funding is being passported directly from WMCA to the City Council, and other Local Authorities in the region have also been passported funds to deliver similar activities.
 - 1.6.2. The continued delivery of the Job Shop “Hub & Spoke” model through the People & Skills Investment Priority, with a particular focus on key areas of deprivation with target groups including those who are 50+ and unemployed, economically inactive and low paid women, ethnic minorities, those with disabilities and health conditions, those with multiple complex needs and young people who are NEET (not in employment, education or training). This funding is being passported directly from WMCA to the City Council (other Local Authorities in the region have also been passported funds to deliver similar activities) and will build on the activities that we have delivered with third sector partners through the People & Skills Investment Priority of UKSPF since 2023.
 - 1.6.3. Capital upgrades to Community Hubs to advance the roll-out of integrated place-based services in communities most in need of them, which is likely to potentially include employment and enterprise support, digital inclusion and health related services. This funding is being passported directly from WMCA to the City Council, and other Local Authorities in the region have also been passported funds to deliver priority capital projects.
 - 1.6.4. Continued co-ordination of UK Shared Prosperity Fund activities in Coventry. This funding is being passported directly from WMCA to the City Council, and other Local Authorities in the region have also been passported funds to deliver similar activities.
 - 1.6.5. Coventry businesses are also expected to benefit from other activities that other organisations will delivering through the remainder of WMCA’s UKSPF allocation within the Local Business Priority, including an expansion of the number of Community Enterprise Hubs to support the development of new enterprises amongst Minority Ethnic Groups in particular (one of which is currently delivered by Highlife Centre in Coventry), Social Enterprise Clusters, Investment Readiness support to

make more businesses prepared to access debt and equity finance, and a dedicated regional Export Support programme to complement national provision by Department for Business & Trade, as well as Trade & Investment activities to be delivered by West Midlands Growth Company.

- 1.7 On top of the UKSPF funding, the City Council is also expecting to receive £2.5m from Business Energy Assessment Service (BEAS) for 2025/26 (£0.8m of which is expected to be revenue funding and £1.7m capital funding), which is an extension of the national Pilot funded by DESNZ that the Authority has been involved in delivering within the West Midlands since April 2024. Although the funds are not included in the Integrated Settlement, the activities are closely aligned with those delivered through the UKSPF Local Business Priority and will build on the Decarbonisation Net Zero Programme that the City Council has delivered through UKSPF funding up to March 2025. The funds to be allocated to the City Council are part of an overall budget of £14m which has been allocated to the West Midlands International Territorial Level (ITL) 1 region (i.e. WMCA area, plus Warwickshire, Herefordshire, Worcestershire, Staffordshire and Shropshire).
- 1.8 This BEAS funding will enable the City Council to continue supporting local businesses with improving their energy and resource efficiency on a 1:1 basis through Free Energy Audits (Coventry & Warwickshire-wide), one-to-many support through the Green Business Network (Region-wide) and Energy Improvement Capital Grants (Coventry only) and will help local businesses advance on their path to Net Zero. This funding will be passported to the City Council as part of extensions to existing delivery contracts the City Council has with Aston University (delivery of Energy Efficiency Audits in Coventry as part of a region-wide consortium), Warwickshire County Council (delivery of Energy Efficiency Audits in Warwickshire) and Birmingham City Council (management of capital grants in Coventry as part of a region-wide consortium).
- 1.9 It is also expected that Coventry businesses will benefit from other business support activities delivered region-wide through other Local Growth and Place funds within the Integrated Settlement. These include Made Smarter West Midlands (£1,226,400 has been allocated to the West Midlands ITL1 region for 2025/26), which supports manufacturing businesses to adopt digital technologies, and the Create Growth Programme (£0.425m has been allocated to the West Midlands) to support the growth of businesses in creative industries.
- 1.10 The Local Growth & Place Pillar also includes Investment Zone funding, with the City Council due to be allocated £0.38m of revenue funding and £5.75m of capital funding in 2025/26. This funding has already been covered within the approval to accept up to £35m of Investment Zone funding in the reports that were approved by Cabinet and Council in March 2024.
- 1.11 **Pillar 2: Adult Skills & Employment Support.** On top of the UKSPF activities funded through the People & Skills and Communities & Place Investment Priorities, the City Council is expected to be awarded £6.27m of revenue funding through this Pillar. This consists of the following:
 - 1.11.1 £5.52m through the Adult Education Budget (AEB), which will be passported from WMCA to the City Council as part of an overall £140m WMCA allocation for the Adult

Skills Fund. This will fund training courses to help local residents acquire the skills to find new jobs, and fund specialist training to help up-skill people already in work. The AEB funding is directly awarded to the City Council's Adult Education Team to provide key foundation and sector specific skills for upwards of 9,000 residents. This is delivered in the community across the city and includes skills such as Digital, English, Maths, English for Speakers of Other Languages (ESOL) and employer designed 'Into Employment' courses. For AEB funding, WMCA allows in year 'Growth Cases' providing further funding for Coventry Adult Education in areas in which they are successful, and we are seeking Delegated Authority to accept any additional AEB funding we are allocated in any such event.

1.11.2 £0.75m through the Connect to Work fund, which has been launched by the Labour government. This will tackle physical and mental health related barriers to employment, and the £0.75m of funding to be passported directly from WMCA to the City Council, as part of an overall allocation of £5.72m that has been awarded to WMCA.

1.12 The City Council will also play a key role in shaping the remaining regional Adult Skills Fund Budget which includes Free Courses for Jobs funding, to ensure a fair share is spent on Coventry residents, in-line with our One Coventry priorities, although WMCA's budget for this fund has been reduced for 2025/26 by 3% from £142.3m to £140m. WMCA will also be awarded £12m of funding for Skills Bootcamps (a reduction from the £26.7m WMCA received in 2024/25), but these Bootcamps will provide short-term training courses to help local residents gain the skills needed by businesses in key growth sectors, and cross-cutting skills such as digital and green skills. This will build on the successes of Bootcamps that have been delivered across the West Midlands in recent years and similar to previous funding rounds, the providers of the Bootcamps will be procured by WMCA.

1.13 **Pillar 3: Retrofit & Net Zero.** The City Council is expected to be awarded £8.52m (£0.94m of revenue funding and £7.58m of capital funding) across two funds to improve the energy efficiency of private domestic homes and the public estate. The funding the City Council will be awarded will include funding for management and co-ordination, and to develop the pipeline of future projects and stimulate additional private investment to deliver future retrofit activities. It should be noted that unlike the other Pillars, these funds will cover a three-year period between 2025/26 and 2027/28, and form part of the WMCA's overall funding allocation of £167.106m. The funds will enable positive work that the City Council has led and co-ordinated to continue in installing energy efficiency measures into public buildings and insulating the homes of those experiencing fuel poverty.

1.13.1 Warm Homes Local Grant – The City Council is expected to be awarded £3.64m to retrofit private dwellings in households experiencing fuel poverty. This funding is being passported directly from WMCA to the City Council, and forms part of an overall WMCA allocation of £30m.

1.13.2 Public Sector Decarbonisation Scheme – The City Council is expected to be awarded £4.88m to improve the energy efficiency of public buildings across Coventry and reduce carbon emissions. This funding is being passported directly from WMCA to the City Council, and forms part of an overall WMCA funding allocation of

£36.324m. As part of the conditions of this grant, match funding will be required equal to 12% of the grant value (amounting to £590,000 in total) to contribute to the building upgrades; however, this will be subject to the acceptance of Business Cases and the organisations needing to provide match funding would depend on the nature of projects approved (these could include the City Council, Schools, Academies or other providers).

- 1.14 The Warm Homes Social Housing Fund is the third fund within the Retrofit & Net Zero Pillar. This £100.77m regional fund will be passported from WMCA directly to Registered Providers (RPs) of social housing based on a fair share allocation. This will include funding for social homes in Coventry that are owned by Citizen Housing, who have worked successfully with the Council over the last 3 years retrofitting over 2,000 homes under the Social Housing Decarbonisation Fund. There is flexibility under the new funding arrangements for RPs to enter into partnerships with the City Council to support delivery if felt the most appropriate route by respective RPs.
- 1.15 Additional funds are likely to be made available directly to the City Council during 2025/26 through the retrofit allocation for housing standards enforcement and to support innovation and market enabling initiatives. The City Council will also benefit from regional funding within the programme to support market development, customer journeys and energy advice through a £4.98m pot within the overall allocation. Further funding may be allocated to the City Council and local Registered Providers of Social Housing in the event of any underspends in the wider programme.
- 1.16 **Pillar 4: Local Transport.** Several streams of transport funding have been included within the Integrated Settlement for 2025/26, but these are all for programmes and services that are being directly managed by Transport for West Midlands on behalf of the WMCA. Around £50m has been allocated in relation to bus service provision, the most significant budgets being Bus Service Operator Grant and the Bus Service Improvement Plan. Coventry will benefit from this funding in the form of continued support for local bus services within the city, but the budgets will be managed centrally by TfWM as currently happens. Similarly, funding for the Local Electric Vehicle Infrastructure Fund has been included within the Integrated Settlement, and will be managed directly by TfWM. The City Council will be bidding to TfWM for funding to maintain the excellent progress in delivering the largest network of public electric vehicle charge points outside London.
- 1.17 Further details of the Integrated Settlement Transport funding are included within the Transport Capital Programme report also being considered by Cabinet and Council in March 2025. This Transport Capital Programme report also outlines details of other funding programmes that are for 2025/26 being kept separate to the Integrated Settlement, notably the ongoing City Region Sustainable Transport Settlement which was confirmed by Government in 2022 for the five-year period to March 2027, and the Active Travel Fund for which the fifth tranche of funding was announced in late 2024. Funding for future rounds of the Active Travel Fund has been included within the Integrated Settlement, but this will also be considered within the Transport Capital Programme report.

- 1.18 **Pillar 5: Housing & Regeneration.** Continuation of WMCA’s Brownfield Land & Infrastructure Fund, Brownfield Housing Fund, and Brownfield Land Release Fund through £62.69m of additional government funds. This funding will remain open for developers to apply for, and although we do not expect the City Council to receive funding directly, there is potential for some Coventry-based projects to be funded.
- 1.19 The City Council and other Constituent Authorities have challenged WMCA on the amount of funding that is being topsliced and retained for regional management and coordination functions. Local delivery should be prioritised over funding for regional functions, and the Council continues to put pressure on WMCA to reduce the value of funding retained regionally, particularly in the light of the economies of scale that Integrated Settlement Funding presents over previous arrangements involving 50+ funding programmes. Should further funding become available as a result of reduction in WMCA central topslicing, this report requests delegated authority to accept such additional funding.

2 Options considered and recommended proposal

- 2.1 The Council could have chosen to decline the opportunity to take on the Integrated Settlement and BEAS funding for Regeneration and Economy activity in Coventry. With WMCA having overall responsibility for the funding and accountability to government, the Council could have chosen to undertake a purely strategic role, working with WMCA to define the activities that would make the biggest difference in the city, and leaving them to commission the activity from third party providers. This approach has been discounted because the Council has an excellent track record of using government funding to run successful projects in business support, employment and skills, retrofit and net zero, and capital regeneration activities. The Council will be lead partner in all activities that it is receiving Integrated Settlement funding for, and if it did not take on this role there is a risk that the overall offer for business and residents would be much poorer, and partner organisations that deliver essential services would struggle to secure funding.
- 2.2 The recommended option is for Coventry City Council to approve acceptance of the funding and act as the lead body for Integrated Settlement and BEAS funding in Coventry covering business support, employment & skills, retrofit and net zero, and capital regeneration projects. This will allow the Council to tackle the city’s key economic, social and environmental challenges and an integrated manner, continue its own high quality in-house delivery where appropriate, and working with external partners and the voluntary sector to ensure that specialist provision is available where that is required. The Council is currently taking this approach through existing UKSPF, Public Sector Buildings Decarbonisation Fund, and Social Housing Decarbonisation Fund, and has led highly effective partnerships to make the most of the funding sources. The preferred option is that Coventry City Council continues to act in this role with the new Integrated Settlement funded work.

3 Results of consultation undertaken

- 3.1 Since September 2024, the WMCA has held regular liaison (minimum one meeting per fortnight) with Senior Officers from Coventry City Council and those in the other 6 Constituent Authorities (plus engagement with non-Constituent Authorities) to

establish each locality's key priorities and how these should shape the focus of activities delivered through the Integrated Settlement. WMCA has also consulted with private sector bodies, such as Business Insights Forum, to further ensure activities are aligned with economic and business needs.

- 3.2 The findings from the One Coventry Plan public consultation process have been instrumental in further defining the focus of activities covered by the funding being passported to the City Council. The consultation processes that fed into the three strategies pertinent to the Integrated Settlement Pillars directly linked to Regeneration and Economy – these being:
 - 3.2.1 The Coventry Economic Development Strategy 2022-2027 consultation process has influenced the focus of activities through the Local Growth & Place Pillar. This featured consultation with key business bodies such as Coventry and Warwickshire Growth Hub, Coventry and Warwickshire Chamber of Commerce and Federation of Small Businesses, plus Coventry University, University of Warwick and the majority of Voluntary and Community Sector.
 - 3.2.2 The Coventry Skills Strategy 2022-2030 consultation process has strongly influenced the focus of activities delivered through the Adult Skills Pillar, as well as the People & Skills Investment Priority of UKSPF (funded through the Local Growth & Place Pillar). Again, the consultation process for this strategy featured engagement with key business bodies (including Coventry & Warwickshire Growth Hub, Coventry & Warwickshire Chamber of Commerce), local colleges and universities, as well as key Independent Training Providers and Community & Voluntary Sector bodies.
 - 3.2.3 The Coventry Climate Change Strategy 2024-2030, which was shaped by a dedicated detailed public consultation, has influenced the focus of activities through the Retrofit & Net Zero Pillar. The Climate Change Strategy has been developed in conjunction with the city's independent Climate Change Board, comprising over 25 major stakeholder organisations across the city from business to community and voluntary sector organisations. Retrofit and net zero have been a particular focus of the Board's Route to Net Zero Pathway Group which includes both Coventry and Warwick Universities, E.ON and Act on Energy.

4 Timetable for implementing this decision

- 4.1 The Integrated Settlement funding through the Local Growth & Place and Adult Skills Pillars makes funding available for the 2025/26 financial year. For the Retrofit & Net Zero Pillar, the funding covers a three-year period of between 2025/26 and 2027/28. With existing funding for similar activities expiring on 31st March 2025, approval is sought to a prompt start of activities in April 2025 to ensure as much continuity as possible of key services that will support local businesses, residents and the environment.

5 Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1 Financial Implications

- 5.1.1 The report seeks authority to accept an allocation of up to £21.94m of external Integrated Settlement and BEAS grant funding for the purposes set out in section 1 of the report. In each case, it constitutes the indicative allocation for Coventry from a wider WMCA allocation for the respective individual Funds.
- 5.1.2 The Public Sector Buildings Retrofit Fund will require match funding worth 12% of the value of the grant being awarded through this Fund. This amounts to £590,000; however, the source of the match funding will depend on the nature of projects being funded through the acceptance of Business Cases and securing the match required. Acceptance of the Integrated Settlement grant will not take place until full due diligence is in place
- 5.1.3 It is not expected that match funding from the City Council is required for the other funds, however where this may be the case, this will be achieved using existing operational budgets in the Economic Development, Skills, Employment & Adult Education, and Climate Change & Sustainability. No other new commitments of match funding will therefore be required as a result of the decisions recommended in this report.
- 5.1.4 The majority of the grant monies awarded will be directed at the delivery of services set out in the report; however, a small amount of each fund will be retained to cover local management costs of the Economic Development, Skills, Employment & Adult Education, Climate Change & Sustainability teams, and where possible overheads, whose budgets are set up to require funding from the grant regimes they deliver.
- 5.1.5 The WMCA is the nominated Accountable body for the Integrated Settlement, however they will in awarding monies to the City Council pass delivery risk to the City Council through formal legal Grant Aid Agreements. See section 6.2 of the report which outlines the approach to risk management.

5.2 Legal Implications

- 5.2.1 The Council will be required to enter into a funding with the appropriate funder in order to draw down the respective funding allocation. Legal and Procurement Service will ensure that the terms and condition associated with the utilisation of the funding set out in this report are reviewed in order to ensure that the council is not entering into an agreement that may involve risk to the Council.
- 5.2.2 All the activities carried out with Integrated Settlement funding and the Business Energy Assessment Service Funding will need to comply with Subsidy Control Legislation that is in force. Under the regime, public authorities are required to self-assess whether the financial assistance they grant is consistent with key principles and will be required to publish information about subsidies. A Subsidy Advice Unit has been established within the Competition and Markets Authority, which will have

oversight of the new regime and will be responsible for advising public authorities on more complex subsidy measures.

5.2.3 The City Council's Legal & Procurement Services will work with the delivery teams to ensure that any support provided to businesses or delivery partners is compliant with the new rules.

5.2.4 Any Public Procurement requirements will be considered and undertaken in accordance the grant conditions, the Councils Contract Procedure Rules and the Public Contract Regulations 2015 (as applicable).

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 Securing Integrated Settlement funding will help to deliver the objectives of the One Coventry Plan.

6.1.2 **Increasing the Economic Prosperity of the City and Region.** The funding for Regeneration and Economy should contribute towards delivering this objective. Notably the UKSPF funding should further help to provide the conditions for enabling local businesses to prosper and help to create good quality jobs. Some of the UKSPF funding should also help to realise new domestic and international investment into Coventry. New funding through the Local Transport Pillar themes and potential funding through the Housing & Regeneration Pillar will also help to create the conditions for future job creation and business prosperity through infrastructure investments.

6.1.3 **Improving Outcomes and Tackling Inequalities Within our Communities.** The funding through the People & Skills Pillar of UKSPF, as well as the funds being made available through the Adult Skills & Employment Support Pillar should help to connect Coventry residents with employment and skills opportunities, by enabling them to access the necessary employment and training support.

6.1.4 **Tackle the Causes and Consequences of Climate Change.** The funding through the Retrofit & Net Zero Pillar provides further opportunities for tackling the causes and consequences of climate change and supports delivery of Coventry's Climate Change Strategy. Retrofitting more homes and improving the energy efficiency of public buildings will help the city make further progress against the aim of lower emission development, as well as in tackling fuel poverty. The investments through the Local Transport Pillar should also incentivise greater take-up of electric vehicles. Moreover, the BEAS successor programme will help to further reduce the carbon footprint of local businesses and support more Coventry firms on a path to net zero.

6.1.5 **Continued Financial Sustainability of the Council.** The Integrated Settlement funding will enable the Council to continue supporting local businesses and residents to prosper, as well as protecting the local environment, by enabling the continuation of essential services in the areas of business support, employment & skills support and retrofit.

6.1.6 Council's Role as a Partner, Leader and Enabler. Securing the Integrated Settlement funding and acting as lead partner for delivering of business, employment & skills and retrofit activities will contribute to the Council's aim to act as leader and enabler for the city, ensuring that through our relationship with WMCA and with our delivery partners, the very best outcomes are achieved for our residents and businesses. It will also position the City Council to help shape the focus of future funding settlements coming into the region post-Spending Review, by playing an important facilitation role in effectively articulating the needs, opportunities and priorities facing Coventry and ensuring this is reflected in WMCA's liaison with government through the Strategic Partnerships created since the signing of the Devolution Deal.

6.2 How is risk being managed?

6.2.1 Coventry City Council has a long track record of delivering externally funded skills, business support and regeneration projects, and the risks associated with this type of work are well understood. For example, there are financial risks such as the failure to deliver output or financial targets, and the risk that this could lead to funding clawback. Risks of this kind are mitigated by ensuring that sufficient programme management resource is available to enforce adherence to the funder's rules, and to work closely with delivery partners to ensure they are producing eligible outputs on time and on budget. There is sufficient experience in the delivery teams in the Economic Development Service, Climate Change & Sustainability Service and the Employment, Skills & Adult Education Service to manage these risks appropriately at service or division level. An entry on the corporate risk register will therefore not be necessary.

6.3 What is the impact on the organisation?

6.3.1 The principal impact on the organisation will be to secure funding for staff directly employed by the Council working on our business support, retrofit and employment and skills activities. Successfully securing Integrated Settlement funding for these programmes will provide funding crucial to retaining highly skilled staff currently working on projects which are due to come an end later this year.

6.3.2 Whilst we do not anticipate impacts to the Council's ICT and accommodation, some of the Council's buildings, as well as the wider public estate in Coventry, could benefit from the Public Sector Decarbonisation Scheme. We will design project activities to minimise the disruption to the building users during its delivery, but to the major nature of these works, it may not be possible to mitigate all disruption entirely. The project team will work closely with all stakeholders to find appropriate solutions to any potential disruption, and any building enhancements will also deliver both immediate carbon emission and energy bill savings.

6.4 Equalities / EIA

6.4.1 We have developed Equalities Impact Assessments (EIA) for the business support programmes and employment and skills activities that have been funded by UKSPF, which will be continued through this next tranche of funding.

6.4.2 In designing our methods of service delivery, we will need to consider the barriers to accessing business and employment & skills 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 that was completed for the Economic Development Strategy and Skills Strategy will also inform our approach.

6.4.3 WMCA will undertake Equality Impact Assessments (EIA) as part of the process of developing Programme Business Cases for the funds through the Net Zero & Retrofit and Housing & Regeneration Pillars, as well as Bus Service Improvement Grant and Bus Service Operators Grant. The region's Constituent Authorities will be expected to feed into the EIAs before the Business Cases are submitted.

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

6.5.1 The BEAS funding for 2025/26 will continue the positive work delivered by the BEAS Pilot during 2024/25 and both the UKSPF-funded Decarbonisation Net Zero Programme and Coventry & Warwickshire Green Business Programme before this, by delivering positive impacts for 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. It is anticipated that other activities funded through the Local Business Pillar of UKSPF will help to grow and further develop businesses operating in green sectors of the economy and create more job opportunities.

6.5.2 The Council's Skills Strategy sets out a clear priority to ensure our skills provision has a strong focus on green skills, with the recent roll-out of our Green Skills Roadmap emphasising this further. The Council's UKSPF employment & skills support activities will support this through ensuring residents are able to access available 'green skills' provision, are given good quality 'green skills' careers advice, connected to employers offering jobs.

6.5.3 The retrofit work to public buildings, social housing and homes characterised by high levels of fuel poverty will have a further positive impact in reducing carbon emissions (notably through reduction of fossil fuel use and increased use of renewable energy to heat buildings) and will also help conserved energy. The active travel components of the Transport Pillar will also have a positive impact of reducing carbon emissions, by encouraging alternatives to car travel, which should also lead to air quality improvements.

6.6 Implications for partner organisations?

6.6.1 Similar to the first tranche of UKSPF funding, a proportion of the City Council's UKSPF allocation will be used to fund the Council's partner organisations in business support, employment and skills programmes. Because the funding available will be considerably less than in previous programmes there is likely to be some impact on partner organisations, particularly VCS organisations involved in employment and skills delivery.

6.6.2 The Social Housing Decarbonisation Funding will entail Registered Providers of Social Housing being awarded funds to retrofit social housing across Coventry. This will include funding for social homes in Coventry that are owned by Citizen Housing, who have worked successfully with the Council over the last 3 years retrofitting over 2,000 homes under the Social Housing Decarbonisation Fund.

6.6.3 The City Council will also continue to work with the other 6 Constituent Authorities and WMCA to further define the detail of delivery arrangements for all of the funds covered through the Integrated Settlement and share good practice and learning points during Fund delivery. Effective partnership working with the other Constituent Authorities and WMCA will also be pivotal to shaping priorities for future funds through the next Spending Review period and ensuring that Coventry's key priorities and opportunities are sufficiently reflected.

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Public report
Cabinet

Scrutiny Co-ordination Committee
Cabinet
Council

06 March 2025
18 March 2025
25 March 2025

Name of Cabinet Member:

Cabinet Member for Policy and Leadership – Councillor G Duggins

Director approving submission of the report:

Chief Executive

Ward(s) affected:

All

Title:

Local Government Association (LGA) Corporate Peer Challenge 2024 – Outcome of Progress Review

Is this a key decision?

No – although the proposals affect more than two electoral wards, the impact is not expected to be significant.

Executive summary:

The Local Government Association (LGA) is the national voice of local government, working with Councils to support, promote, and improve local government. The LGA's Corporate Peer Challenge offer is effective and well regarded by the sector and provides robust, strategic and credible challenge and support to Councils.

It is expected that all Councils receive a Corporate Peer Challenge at least every five years covering core areas and any specific areas requested by the Council. Coventry City Council's second Corporate Peer Challenge took place from 15th to 18th January 2024.

The visit focused on five core themes (local priorities and outcomes, organisational and place leadership, governance and culture, financial planning and management, and capacity for improvement). These areas are critical to Councils' performance and improvement.

We also asked the Peer Team to provide feedback on the organisation's corporate capacity and plans for service transformation, recognising the opportunity to receive some external challenge and feedback on future delivery plans.

At the time of the Corporate Peer Challenge in January, the Peer Team recognised that Coventry is an ambitious place that is on the up, with examples of innovation and a willingness to embrace change, whilst not forgetting its heritage. The Peer Team also noted that the Council is well-run, with strong officer and political leadership.

Following the Peer Challenge, the Council reflected on the Peer Team's findings in order to determine its response to the recommendations that were made. The link to the Council response is provided below (see background papers).

Corporate Peer Challenge – Progress Review

All Corporate Peer Challenges now include a progress review which takes place approximately 10 months after the original Peer Challenge visit. This review provides space for a Council's senior leadership to report to the Peer Team on the progress made against the key recommendations, discuss early impact or learning and receive feedback on the implementation of the action plan.

The LGA Corporate Peer Challenge progress report is provided as an appendix to this report (Appendix A). This report provides a detailed response on findings, including a number of observations and suggestions within the main section of the report.

Overall, the Peer Team were impressed at the level of progress made by Coventry City Council since the Corporate Peer Challenge. Work has been undertaken to respond to the recommendations including actions which were already underway prior to the original Peer Challenge and the Peer Team acknowledged the structured approach for making improvements and changes to achieve the Peer Team's recommendations.

In summary, during the progress review, the Peer Team:

- heard more examples of improvement and success, which was gratifying;
- saw that the Council was showing a confidence to make adjustments to its improvement journey where this was necessary, for example in reconsidering its approach to transformation;
- also heard again of the strong and visible leadership provided by the Leader of the Council and the Chief Executive;
- noted that the Council continues to be financially well managed but is facing similar demand and inflation pressures as other Councils and there is a strong recognition that the Council's use of reserve to balance the accounts is not sustainable and that it must continue to work to ensure meaningful service and organisational transformation.

More detailed feedback was provided under six key themes which includes acknowledgment of the progress made and some suggestions for continued improvement. These areas are described in the 'Progress Review - Feedback' section of the LGA's progress review report (see Appendix A to the report) and a summary of these findings can be found from section 1.14 below.

Recommendations:

Scrutiny Co-ordination Committee is requested to:

- 1) Support the recommendations to Cabinet.
- 2) Identify any further recommendations to Cabinet in relation to the outcome of the Progress Review.

Cabinet is requested to:

- 1) Support the work to deliver the actions which respond to the recommendations made by the Peer Team.
- 2) Consider any comments made by Scrutiny Co-ordination Committee in relation to the outcome of the Peer Challenge.

Council is requested to:

- 1) Note the content of the Peer Team's progress review report and support the work to deliver the actions which respond to the recommendations made by the Peer Team.

List of Appendices included:

The following appendix is attached to the report:

Appendix A – LGA Corporate Peer Challenge Progress Report

Appendix B – Briefing Note from Scrutiny Co-ordination Committee – 6 March, 2025

Background papers:

LGA Corporate Peer Challenge Feedback Report –

<https://edemocracy.coventry.gov.uk/documents/s60841/04%20Appendix%20A.pdf>

Council Response to Peer Team Recommendations –

<https://edemocracy.coventry.gov.uk/documents/s60842/04%20Appendix%20B.pdf>

Other useful documents

Local Government Association (LGA) Corporate Peer Challenge 2024 – Outcome of Peer Challenge: Cabinet Report

<https://edemocracy.coventry.gov.uk/documents/s60840/04%20Local%20Government%20Association%20LGA%20Corporate%20Peer%20Challenge%202024%20Outcome%20of%20Peer%20Challenge.pdf>

Has it or will it be considered by Scrutiny? Yes – 06 March 2025 – Briefing Note attached

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 – 25 March 2025

Report title: LGA Corporate Peer Challenge 2024 – Outcome of Progress Review

1. Context (or background)

- 1.1. Peer Challenge is a core element of the LGA's sector-led improvement offer to local authorities. The activity is improvement focused, with the scope being agreed by the Council and tailored to reflect local needs and specific requirements.
- 1.2. Coventry City Council invited the LGA to undertake a Corporate Peer Challenge in January 2024.
- 1.3. The core components of each Corporate Peer Challenge relate to local priorities, organisational leadership, governance, financial resilience and capacity for improvement. These elements help Councils to check they have the capacity to continue to deliver their priorities.
- 1.4. In addition, Coventry City Council asked the LGA to provide feedback on the organisation's corporate capacity and plans for service transformation, recognising the opportunity to receive some external challenge and feedback on future delivery plans.
- 1.5. The original LGA feedback report highlighted 10 main recommendations, specifying areas for improvement, arising from the Peer Challenge. The recommendations were as follows:

1. City Centre masterplan

The Council should continue to work at pace to develop a city centre masterplan with the support and involvement of partners.

2. One Coventry Plan

The next iteration of the One Coventry Plan needs to include a corporate delivery plan supported by consistently developed service plans and should include a review of the corporate strategy framework to ensure strategies are linked and gaps are identified.

3. Employees

The Council has rich data from the recent workforce survey and should develop actions to address the issues it highlights. A key element of this would be ensuring there is further support for the employee networks.

4. Medium Term Financial Strategy (MTFS)

Future financial modelling within the MTFS should consider the full impact and risk of key underlying assumptions e.g. demographic change, inflation, and policy on issues such as real living wage.

5. Financial accounts

The Council should make swift progress to sign off and publish their outstanding

financial accounts.

6. Transformation programme

The transformation programme is at a very early stage of development, and the Council should focus on rapid engagement and mobilisation of the right skills, capacity and capability needed to deliver.

7. Communications

The Council should develop a refreshed external communication strategy.

8. Performance management

The Council should use the established performance framework to drive improvement and bring greater prioritisation and visibility to areas that require improvement.

9. Elected Member training

Elected Members are keen to engage with opportunities for training and development and the Council should review barriers to take up of the current offer and how these can be addressed.

10. Workforce Diversity

The Council should take further steps to improve diversity across the organisation at all levels.

- 1.6. The Council's response (see link in background papers) describes the work that is being undertaken to address each recommendation. Many of the actions set out in the action plan were already in progress before the Peer Challenge and were not initiated as a direct result of Peer Challenge feedback.
- 1.7. All Corporate Peer Challenges now include a progress review which takes place approximately 10 months after the original Peer Challenge visit. The purpose of this is to help the Council assess the impact of the Peer Challenge and demonstrate the progress it has made against the areas of improvement and development identified by the Peer Team.
- 1.8. The LGA and the Council worked together to agree the timetable of activities for this one day progress review which took place on 22 November 2024.
- 1.9. Four members of the original Corporate Peer Challenge team returned to Coventry for the Progress Review.
- 1.10. The Progress Review focused on each of the recommendations from the Corporate Peer Challenge, under the following theme headings:

- 1.City Centre
- 2. Workforce
- 3.Finance and the Medium Term Financial Strategy
- 4. Transformation
- 5. Communication
- 6. Performance Management

1.11. The LGA's progress review report was received following the Peer Team's return visit (Appendix A). This report provides a detailed response regarding these findings and includes recognition of progress and suggestions for the Council to consider. The LGA will also publish the progress report on their website.

1.12. Overall, the Peer Team were impressed at the level of progress made by Coventry City Council since the Corporate Peer Challenge. Work has been undertaken to respond to the recommendations including actions which were already underway prior to the original Peer Challenge and the Peer Team acknowledged the structured approach for making improvements and changes to achieve the Peer Team's recommendations.

1.13. Extracts from the Peer Team's findings from the progress review are summarised below.

1.14. Theme 1) City Centre

- Since the Peer Team's visit in January 2024 some great work has been done: the Council has begun work on setting out its vision and objectives for the city centre.
 - It approved a reserved matters application for Phase 1 of Coventry City Centre South at the beginning of March 2024; on site work for the City Centre South development is due to start in the new year and to be completed in 2034.
 - High level scoping work has started on a 50-acre, mixed-use regeneration which will be an opportunity for the Council, working with investors, to create new communities in a vibrant city centre.
- The Council's approach will need to enable it to work towards a vision with partners that ensures inclusivity and commercial and physical regeneration that goes hand in hand with meeting the Council's housing ambitions.

1.15. Theme 2) Workforce

- The peer team recognise that a lot of work has been done to change human resource and organisational development practices within the Council. Amongst other actions, the Council has:
 - developed an action plan to address the issues raised in the staff survey;
 - established a leadership development programme;
 - been introducing a more targeted and challenging appraisal process;
 - introduced a psychological safe place programme; and
 - established an approach to talent management.

- Diversity remains a key issue for the Council as it seeks to meet the expectations of its communities and workforce. The Council has sought to improve its recruitment processes and has provided training for recruitment panels, to enable them to be more diverse in their make-up and more aware of the equalities, diversity and inclusion issues. In the view of the peer team the Council has not yet seen the full impact of these changes on the workforce composition.
- The peer team recognises the work being done to support staff networks, which includes additional support and training for network chairs and continuing sponsorship from senior staff.

1.16. Theme 3) Finance and the Medium-Term Financial Strategy

- The Council continues to be financially well-managed.
- As with most other Councils, it has faced significant in-year (2024/25) pressures in services such as Adults and Children's Social Care and Housing, as a result of inflationary pressures, increased demand and the complexity of cases.
- The in-year position also reflects that some of the savings projected at the beginning of the financial year have been slower to materialise.
- The statement of accounts for 2020/21, 2021/22 and 2022/23 were approved by Audit and Procurement Committee in November 2024 and were subsequently published, meeting the December backstop date. The accounts for 2023/24 were also published in November and are now subject to audit by the Council's external auditor.
- The financial position of the Council is well understood by Members and officers and there is a shared commitment to managing the Council's finances effectively.

1.17. Theme 4) Transformation

- The Council has recognised a need for the approach to transformation to be more focused and pacier.
- New governance arrangements for the programme have been put in place. There is now a smaller and more tightly drawn Change Board with senior representation from Finance, Organisational Development and the continued involvement of the Chief Executive. The Peer Team thought these changes made sense and that they should improve the focus and pace.
- The Peer Team thought that there was still a need for a clearer narrative on transformation in terms of the distinction between improvement and savings and the link to the Medium Term Financial Strategy.
- Achieving savings through the transformation programme will be critical to supporting the Council to meet financial challenges.
- The peer team consider that there will be a need to bring in additional external expertise, with the right skills, energy and drive so that delivery can be accelerated.

1.18. Theme 5) Communication

- Much progress has been made on internal and external communications. The new communications strategy has led to greater visibility and channel reach. The intention has been to make external communications more strategic, to further develop the narrative and to be more responsive through a range of channels.
- The Council is undertaking a residents' survey, and this will give further feedback on the new communications approach.
- The Peer Team considered that building on the progress so far, the next steps are how to get further focus on communities that are harder to reach and to gain more customer feedback to improve policy insight, traction and communication on transformation.
- The Council is also strengthening its internal communications. The Peer Team found that there was good and continued visibility of the leadership of the Council and the roadshows have helped with this. The Council recognises that there is still more to do to ensure better internal coordination.

1.19. Theme 6) Performance Management

- The Peer Team heard that the Council recognises the need for a strengthened corporate drive to performance management and to achieve this the Council is harnessing its directorate performance capacity to improve its corporate understanding.
- The Council recognises that it requires the leadership skills to drive the use of data and to embed this across the organisation. To achieve this the Council is seeking to recruit those skills into the organisation.
- The Council has been reviewing its corporate performance management products, including the Leadership dashboard with a view to being able to identify areas for improvement and prioritisation.
- Going forward the changes to programme governance and the plans for strategic recruitment will place the Council in a stronger position to ensure that performance informs resource allocation and the Council can focus on areas that require improvement.

1.20. The Peer Challenge process has given us a valuable opportunity to reflect and helped us to identify our strengths to leverage progress to date with renewed momentum. It has also helped us to identify specific areas of focus where we could look to optimise how we work. The Council will continue to reflect on these findings and suggestions in order to determine how the organisation wishes to take things forward.

2. Options considered and recommended proposal

- 2.1. There is an expectation that all Councils will take up the Peer Challenge offer, at a time of their choosing, as an effective tool for improvement. Independent evaluations of the LGA's Corporate Peer Challenge programme have previously concluded that there is a positive impact and a range of benefits from the Council receiving a Peer Challenge.
- 2.2. Cabinet is recommended to support the ongoing work to deliver the actions which respond to the recommendations made by the Peer Team.

3. Results of consultation undertaken

- 3.1. A range of partner organisations and stakeholders were engaged in the original Peer Challenge which included Council employees, Elected Members, Trade Unions, partners and residents. The progress review was lighter touch and involved a small number of meetings with Council employees and Elected Members.

4. Timetable for implementing this decision

- 4.1. The improvement plan associated with the Peer Challenge will continue to be monitored through the Council's Leadership Board.
- 4.2. The current LGA sector-led improvement support offer includes an expectation that all Councils will have a Corporate Peer Challenge or Finance Peer Review every 4 to 5 years. It is therefore anticipated that Coventry will commission its next Peer Challenge by 2029.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1. Financial Implications

There are no specific financial implications associated with this report. Should it transpire that the delivery of any of the specific actions require additional resources, these will be sought from within existing resources, ensuring appropriate organisational governance is in place to identify the requirement and the associated funding source.

5.2. Legal Implications

There are no specific legal implications associated with this report.

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>

Progressing the areas identified during the Peer Challenge will make a positive contribution to the delivery of the Council's priorities, particularly in relation to promoting the growth of a sustainable Coventry economy and improving the quality of life and outcomes for Coventry people.

6.2. How is risk being managed?

The Council's Leadership Board will be responsible for oversight of delivery of Peer Challenge recommendations. Where recommendations are associated with other change or improvement programmes, risk will be managed through individual programme governance arrangements.

6.3. What is the impact on the organisation?

There are no direct implications at this stage.

6.4. Equalities / EIA?

No specific analysis of equality impacts was completed in the course of the Peer Challenge or follow-up visit.

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

None

6.6. Implications for partner organisations?

Although led by the City Council, the original Peer Challenge included a number of partner organisations as well as representatives from various partnership boards across the city and wider geographical area. Progressing the improvements identified will require input and leadership from everyone.

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Julie Newman	Director of Law and Governance	-	20/02/25	24/02/25
Julie Nugent	Chief Executive	-	21/02/25	25/02/25
Councillor G Duggins	Cabinet Member for Policy and Leadership	-	19/02/25	21/02/25

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LGA Corporate Peer Challenge – Progress Review

Coventry City Council

22 November 2024

Feedback



Corporate Peer Challenge



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1. Introduction

The council undertook an LGA Corporate Peer Challenge (CPC) during 15-18 January 2024 and promptly published the full report with an action plan.

The Progress Review is an integral part of the Corporate Peer Challenge process. Taking place approximately ten months after the CPC, it is designed to provide space for the council's senior leadership to:

- Receive feedback from peers on the early progress made by the council against the CPC recommendations and the council's RAG rated CPC Action Plan.
- Consider peer's reflections on any new opportunities or challenges that may have arisen since the peer team were 'on-site' including any further support needs
- Discuss any early impact or learning from the progress made to date.

The LGA would like to thank Coventry Council for their commitment to sector led improvement. This Progress Review was the next step in an ongoing, open and close relationship that the council has with LGA sector support.

2. Summary of the approach

The Progress Review at Coventry council took place (onsite) on 22 November 2024

The Progress Review focussed on each of the recommendations from the Corporate Peer Challenge, under the following theme headings:

- City Centre working
- Workforce
- Finance and the MTFS
- Transformation
- Communication
- Performance management

For this Progress Review, the following members of the original CPC team were

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Local Government Association company number 11177145 Improvement and Development Agency for Local Government company number 03675577

Chair: Councillor Louise Gittins

Chief Executive: Joanna Killian

President: Baroness Grey-Thompson

involved:

- Cllr Eamonn O'Brien, Leader of Bury Council
- Pam Smith, Chief Executive Newcastle City Council
- Rupaben Raghwani, Assistant Director: Finance Transformation & Change, Southwark Council
- Eamon Lally, Peer Challenge Manager, Local Government Association

3. Progress Review - Feedback

The peer team welcomed the opportunity to return to Coventry City Council to see what progress the council has made over the past year in meeting the recommendations from the original CPC Report. At the CPC held in January 2024 the peer team recognised that Coventry is an ambitious place that is on the up, with examples of innovation and a willingness to embrace change, whilst not forgetting its heritage. The peer team also noted that the council is well-run, with strong officer and political leadership. During the peer team's return to the council for the Progress Review, it heard more examples of improvement and success, which was gratifying. The peer team also saw that the council was showing a confidence to make adjustments to its improvement journey where this was necessary, for example in reconsidering its approach to transformation. The peer team also heard again of the strong and visible leadership provided by the Leader of the council and the Chief Executive. The council continues to be financially well managed but is facing similar demand and inflation pressures as other councils and there is a strong recognition that the council's use of reserves to balance the accounts is not sustainable and that it must continue to work to secure meaningful service and organisational transformation.

The councils Progress Review updated position Statement November 2024 provides commentary on progress against the CPC recommendations. Overall, the peer team were impressed at the level of progress made by Coventry City Council since the CPC and noted the structured approach taken by the council for making improvements and changes to achieve the peer team's recommendations. The council has been open about the continuing challenges it faces.

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City centre: During its onsite visit in January 2024 the peer team noted that Coventry was an ambitious place and the team are pleased to see that this ambition remains strong. The council is central to the development of the city and is working on a range of investment opportunities. Since the peer team's visit in January 2024 some great work has been done: the council has begun work on setting out its vision and objectives for the city centre. It approved a reserved matters application for Phase 1 of Coventry City Centre South at the beginning of March 2024; on site work for the City Centre South development is due to start in the new year and to be completed in 2034. High level scoping work has started on a 50-acre, mixed-use regeneration which will be an opportunity for the council, working with investors, to create new communities in a vibrant city centre. The council's approach will need to enable it to work towards a vision with partners that ensures inclusivity and commercial and physical regeneration that goes hand in hand with meeting the council's housing ambitions.

Workforce: The peer team recognise that a lot of work has been done to change human resource and organisational development practices within the council. The peer team heard that since its visit in January 2024, amongst other actions, the council has: developed an action plan to address the issues raised in the staff survey; established a leadership development programme; been introducing a more targeted and challenging appraisal process; introduced a psychological safe place programme; and established an approach to talent management. Diversity remains a key issue for the council as it seeks to meet the expectations of its communities and workforce. The council has sought to improve its recruitment processes and has provided training for recruitment panels, to enable them to be more diverse in their make-up and more aware of the equalities, diversity and inclusion issues. The council said that it would be looking at the data in the new year to consider the impact of these changes. However, in the view of the peer team the council has not yet seen the full impact of these changes on the workforce composition. Part of the equation is for the council to continue to find opportunities to sell itself as an employer to communities. More direct approaches with communities might be applied. The peer team noted the initiative undertaken in Newcastle where

accelerated recruitment rounds have been undertaken in communities in an approach which embraces the 'see me not CV' tag line.

The peer team recognises the work being done to support staff networks, which includes additional support and training for network chairs and continuing sponsorship from senior staff.

Financial management: The council continues to be financially well managed. That said, as with most other councils, it has faced significant in-year (2024/25) pressures in services such as Adults and Children's social care and Housing, as a result of inflationary pressures, increased demand and the complexity of cases. The in-year position also reflects that some of the savings projected at the beginning of the financial year have been slower to materialise. The resultant impact, as of quarter 2, is an in-year overspend of £10.2mil. The council expects the overspend will reduce by year end and that all anticipated savings will be achieved in due course. In our CPC report we were concerned to ensure that all underlying assumptions around demography, inflation and policy issues were taken into account. This has been taken on board and there is now a need to continually monitor and review these assumptions.

Following the CPC in January 2024, the team stressed the need for the council to move quickly to publish its outstanding financial accounts. It is important to acknowledge that the slow pace of auditing annual financial accounts is a national issue that reflects, to a large extent, challenges in the audit sector rather than specific issues with councils' accounts. Coventry council's statements of accounts for 2020-21, 2021-22, and 2022-23 were approved by the council's Audit and Procurement Committee on the 24th November 2024 and were subsequently published, meeting the 13 December 2024 Backstop date. These accounts have been published with a disclaimer of opinion by the external auditor. The accounts for 2023/24 were published on 29 November and are now subject to audit by the council's external auditor. The Backstop date for these accounts to be audited is 28 February 2025. It is the opinion of the council that the delay in publication of the reports has not impacted on its financial standing or its ability to attract investment into the area.

The financial position of the council is well understood by Members and officers and

there is a shared commitment to managing the council's finances effectively. The council's financial management over past years has meant that its financial standing overall is sound. The council has healthy reserves and, as with the last financial year, can draw on these to cover overspends. However, the council realises that this is not sustainable and is looking to transformation to deliver the changes required to reinforce financial stability as well as improving service delivery.

Transformation: The council has recognised a need for the approach to transformation to be more focused and pacier. New governance arrangements for the programme have been put in place. There is now a smaller and more tightly drawn Change Board with senior representation from Finance, Organisational Development and the continued involvement of the Chief Executive. The peer team were told that the focus of the Board will be on strengthening accountabilities and identifying issues and solutions. The peer team thought that these changes made sense and that they should improve the focus and pace. However, the peer team thought that there was still a need for a clearer narrative on transformation in terms of the distinction between improvement and savings and the link to the Medium Term Financial Strategy. It will be important to make sure there is a link to customer value and making sure the community is fully engaged in the reform. Achieving savings through the transformation programme will be critical to supporting the council to meet financial challenges. Currently the transformation plan, which is a one-year plan for 2024/25, and which we understand will be further revised, anticipates total estimated savings of £12.22m in 24/25 rising to £16.07m in 25/26 and £16.89 in 26/27. As we have said above, these savings are being achieved more slowly than expected. Making sure arrangements are in place to achieve the identified savings through having a tight hand on activities, savings and accountabilities will be critical. The peer team consider that there will be a need to bring in additional external expertise, with the right skills, energy and drive so that delivery can be accelerated.

Communications: much progress has been made on internal and external communications. The new communications strategy has led to greater visibility and channel reach. The intention has been to make external communications more strategic, to further develop the narrative and to be more responsive through a range of channels. The council is engaged in proactive campaigns such as Fairer Coventry,

Working for You, Electric City/Future City, Love Cov and One Coventry (internal campaign). Digital communications are now much stronger with bulletins reaching significantly more people and with budget survey responses doubling. The council is undertaking a residents' survey, and this will give further feedback on the new communications approach. It is expected to highlight greater visibility by the public. The peer team considered that building on the progress so far, the next steps are how to get further focus on communities that are harder to reach and to gain more customer feedback to improve policy insight, traction and communication on transformation.

As part of its revised Communications Strategy, the council has undertaken re-branding work to raise communities' awareness of its activities through campaigns such as Working for You and Love Cov. It primarily operates under two logos, the council's own brand and the One Coventry brand which emphasises when the council is acting in partnership, with extensive partnership working taking place across the city. The peer team thought that this was useful work enabling the council to strengthen its identity.

Internal communications: the council is also strengthening its internal communications. It has undertaken roadshows to explain the organisational narrative, but as importantly, to listen to staff; this included engaging with the staff networks. The peer team found that there was good and continued visibility of the leadership of the council and the roadshows have helped with this. The greater level of planning around communications, through the establishment of an internal communications board, with communications and Human Resource involvement, is providing a solid framework for engagement, although the council recognises that there is still more to do to ensure better internal coordination.

Performance management: the council's approach to performance management, as set out in its framework, has been to build on the systems and processes already in place, rather than to establish a further layer of bureaucracy. During the progress review the peer team heard that the council recognises the need for a strengthened corporate drive to performance management and to achieve this the council is harnessing its directorate performance capacity to improve its corporate understanding. The council recognises that it requires the leadership skills to drive

the use of data and to embed this across the organisation. To achieve this the council is seeking to recruit those skills into the organisation. The council has been reviewing its corporate performance management products, including the Leadership dashboard with a view to being able to identify areas for improvement and prioritisation. Going forward the changes to programme governance, as set out under transformation above, and the plans for strategic recruitment will place the council in a stronger position to ensure that performance informs resource allocation and that the council can focus on areas that require improvement. This understanding should help to inform design and delivery of transformation programmes. In the CPC report, the peer team raised the need for consistently developed service plans and the council has responded by ensuring that service plans will be in place for the next financial year 'creating a golden thread from the corporate One Coventry to individual performance and management objectives'.

Key recommendations from the Corporate Peer challenge report

1. City Centre masterplan

The council should continue to work at pace to develop a city centre masterplan with the support and involvement of partners.

2. One Coventry Plan

The next iteration of the One Coventry plan needs to include a corporate delivery plan supported by consistently developed service plans and should include a review of the corporate strategy framework to ensure strategies are linked and gaps are identified.

3. Employees

The council has rich data from the recent workforce survey and should develop actions to address the issues it highlights. A key element of this would be ensuring there is further support for the employee networks.

4. Medium Term Financial Strategy

Future financial modelling within the MTFS should consider the full impact and risk of

key underlying assumptions e.g. demographic change, inflation, and policy on issues such as real living wage.

5. Financial accounts

The council should make swift progress to sign off and publish their outstanding financial accounts.

6. Transformation programme

The transformation programme is at a very early stage of development, and the council should focus on rapid engagement and mobilisation of the right skills, capacity and capability needed to deliver.

7. Communications

The council should develop a refreshed external communication strategy.

8. Performance management

The council should use the established performance framework to drive improvement and bring greater prioritisation and visibility to areas that require improvement.

9. Member training

Members are keen to engage with opportunities for training and development and the council should review barriers to take up of the current offer and how these can be addressed.

10. Workforce Diversity

The council should take further steps to improve diversity across the organisation at all levels.

4. Final thoughts and next steps

The LGA would like to thank Coventry City Council for undertaking an LGA CPC Progress Review.

We appreciate that senior managerial and political leadership will want to reflect on

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these findings and suggestions in order to determine how the organisation wishes to take things forward.

Under the umbrella of LGA sector-led improvement, there is an on-going offer of support to councils. The LGA is well placed to provide additional support, advice and guidance on a number of the areas identified for development and improvement and we would be happy to discuss this.

Helen Murray (Principal Adviser) is the main point of contact between the authority and the Local Government Association (LGA) and their e-mail address is helen.murray@local.gov.uk

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Briefing Note

To: Cabinet

From: Scrutiny Co-ordination Committee

Date: 18th March 2025

Subject: Local Government Association (LGA) Corporate Peer Challenge 2024- Outcome of Progress Review

1 Purpose of the Note

- 1.1 To update Cabinet on the outcome of the consideration of an item - Local Government Association (LGA) Corporate Peer Challenge 2024- Outcome of Progress Review at the meeting of Scrutiny Co-ordination Committee on 6th March 2025

2 Recommendations

- 2.1 Scrutiny Co-ordination Committee supports the recommendations to Cabinet with no additional recommendations.

3 Information and Background

- 3.1 At their meeting on the 6th March 2025, Scrutiny Co-ordination Committee considered a report on the Local Government Association (LGA) Corporate Peer Challenge 2024- Outcome of Progress Review.
- 3.2 The item was introduced by the Leader and the Committee received a brief presentation highlighting key aspects of the report.
- 3.3 The Committee questioned the Leader and officers and received responses on the following areas:
 - How communities can feed into the transformation programme and the use of the household survey to inform priorities
 - The governance of the Transformation and the development of a Change programme
 - Performance management was part of the One Coventry Plan process and how to consider real time access to information on KPI's
 - How Scruco can continue to monitor the 6 priorities identified through the Peer Challenge
 - How progress on the refreshed Communications Strategy had been recognised by the review team.

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Cabinet

18 March 2025

Name of Cabinet Member:

Cabinet Member for City Services – Councillor P Hetherton

Director approving submission of the report:

Director of City Services and Commercial

Ward(s) affected:

All wards

Title:

2025/26 Transport Capital Programme

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City

Executive summary:

The Coventry Transport Strategy was approved by Council in December 2022. It is a 15-year Strategy which sets out plans to fundamentally change the city's transport system, including by investing in significant improvements to public transport, walking and cycling and by accelerating the transition to zero emission vehicles.

This report includes details of a number of capital programmes which will be delivered over the coming year. This includes a £3.1m programme of local network improvements, an £11.9m programme of highways maintenance and up to £2m (subject to funding approval) of further improvements to walking and cycling. These programmes form part of the Council's wider commitment to deliver the changes set out in the Coventry Transport Strategy.

Funding sources for these programmes include the City Region Sustainable Transport Settlement (CRSTS) and tranche 5 of the Active Travel Fund (ATF5). In the future, both CRSTS and ATF funding will be absorbed into the West Midlands' wider Integrated Settlement, along with several of further sources of transport funding.

Recommendations:

Cabinet is recommended to:

1. Approve delivery of the 2025/26 programmes of local network improvements and highways maintenance schemes, as set out in Appendices 1 - 3 of the report
2. Review the latest update on Active Travel Fund tranche 5 and delegate authority to the Director of City Services and Commercial, following consultation with the Cabinet Member for City Services and the Director of Finance and Resources, to:
 - accept any funding that is secured via this fund up to a maximum sum of £2.5 million pounds
 - add any schemes which receive sufficient funding to the five-year capital programme and approve their delivery
3. Review the latest update on arrangements for future transport funding to be received as part of the West Midlands Integrated Settlement

List of Appendices included:

- Appendix 1 – Local Network Improvement Programme 2025-26 Scheme List
- Appendix 2 – Highways Maintenance Description of Maintenance Schemes
- Appendix 3 – Highways Maintenance Scheme Locations

Background papers:

None

Other useful documents:

The Coventry Transport Strategy and accompanying Implementation Plan are published on the Council's website at <https://www.coventry.gov.uk/transport-strategy-2>

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?

The Transport Capital Programme will also be considered by the Council's Leadership Board. At the time of writing, the date for this meeting is to be confirmed.

Will this report go to Council?

No

Report title: 2025/26 Transport Capital Programme

1. Context (or background)

- 1.1. The Coventry Transport Strategy was approved by Council in December 2022. It is a 15-year Strategy which sets out plans to fundamentally change the city's transport system, including by investing in significant improvements to public transport, walking and cycling and by accelerating the transition to zero emission vehicles.
- 1.2. The Strategy is accompanied by a detailed Implementation Plan setting out the 'pipeline' of specific improvements that the Council intends to deliver over the lifetime of the Strategy, with a particular emphasis on years 1-5. This Plan was approved at the same time as the Strategy but has subsequently been updated, with some minor changes being approved by Cabinet in October 2024.
- 1.3. The Implementation Plan (published on the Council's website at <https://www.coventry.gov.uk/transport-strategy-2/coventry-transport-strategy-implementation-plan>) therefore includes details of all the major transport schemes which the Council is currently planning to deliver. This includes, for example, details of planned new segregated cycleways, significant junction improvements and public transport improvements such as the introduction of Very Light Rail and potential new railway stations. No decisions are currently being sought in relation to these major schemes, the development/delivery of which are ongoing.
- 1.4. The Strategy also includes delivery of a rolling programme of local network improvements and highway maintenance schemes across the city's road network, which complement the major schemes described above. This report provides details of the planned improvements which are proposed to be delivered under these programmes during 2025/26, for which approval is sought.
- 1.5. In addition to this, the report also provides an update on several smaller schemes aimed at promoting walking and cycling, which the Council hopes to deliver using ATF5 funding. These schemes are also intended to support successful delivery of the Coventry Transport Strategy. However, at this time the level of funding available to deliver these is still to be confirmed. Approval is therefore sought to delegate authority to the Director of City Services and Commercial to accept this funding (once this is confirmed), to add funded schemes to the 5-year capital programme and to approve their delivery.
- 1.6. Finally, the report provides an update on future funding arrangements for transport. This is also covered in a separate Cabinet report on the West Midlands Combined Authority Integrated Settlement.

City Region Sustainable Transport Settlement (CRSTS)

- 1.7. Investment in transport infrastructure is mainly funded via external funding, most of which is administered by the West Midlands Combined Authority (WMCA) as the strategic transport authority for the region. This is currently comprised of money from several different funds but the largest of these is CRSTS.

1.8. CRSTS is a five-year capital funding settlement between WMCA and central Government. Across the region, it is worth £1.1bn, over the period 2022 to 2027. As well as funding the development and delivery of several major schemes including, for example, the Coventry Very Light Rail Demonstrator Project, this also includes funding for our ongoing programmes of local network improvements and highways maintenance.

Local network improvements

1.9. Improving road safety is a priority for the Council and good progress is being made, with rolling three-year data showing a 38% reduction in personal injury collisions and a 40% reduction in casualties occurring on roads within the city over the last 10 years (2015-2024).

1.10. Each year injury collision data (as collated by the Police) is analysed and a prioritised list of locations where further investigation and interventions may be considered is produced. This evidence led approach ensures resources are targeted at locations where there is the potential to achieve the most positive outcomes.

1.11. These schemes form part of the annual Local Network Improvement Programme (LNIP), along with other schemes which help support vulnerable road users, improve traffic management and ensure compliance with the Council’s statutory ‘network management duties’, as set out in the Traffic Management Act 2004.

1.12. In 2025/26, the City Council will receive just over £2m from CRSTS for the LNIP programme. However, a reprofiling exercise carried out in quarter 3 of 2024/25 made some additional funding (previously allocated to other CRSTS schemes in the region) available for further improvements, while the Council also secured funding through the Traffic Signal Obsolescence Grant and Green Light Fund in 2024. Once these additional funds are taken into account, this gives a total LNIP budget for 2025/26 of £3.1m.

1.13. The table below provides a high-level summary of how this funding will be spent, with each line representing a programme of works. Further details of some of these programmes is provided below, with a full list of the specific locations where work is proposed to take place also being provided in Appendix 1.

Programme/ scheme	Description of works included	Cost
Local Safety schemes	Road safety interventions based around priority sites including, site investigation and scheme development and implementation. To include road layout safety improvements, speed management including vehicle actuated sign and Average Speed Enforcement scheme extension (subject to support from West Midlands Police), and delivery of School Streets phase 3	£730,000

Vulnerable users	Measures focused on improving the safety and experience for vulnerable road users. To include Pedestrian Improvements, new crossing facilities and school related initiatives such as 20mph speed limits	£535,000
Traffic management	Provision of schemes and initiatives to aid the operation and efficiency of the network. To include junction improvement schemes, Moving traffic enforcement, traffic regulation orders and minor community lead interventions	£431,600
Urban Traffic Management and Control	Urban Traffic Management and Control focused enhancements and upgrades. To include LED upgrade to existing sites, including energy efficiency, and operational improvements, upgrade of portable variable message units, upgrade of crossing sites with installation of pedestrian crossing facilities	£613,000
Urban Traffic Management and Control Green Light Fund	Crossing and signal upgrades and improvements funded through the DfT Green Light Fund	£470,000
Major Scheme Development	Development of future schemes including, for example, carrying out traffic surveys, traffic modelling and scheme design	£290,400
TOTAL		£3,070,000

- 1.14. Average Speed Enforcement (ASE): As part of the 2024/25 LNIP programme the ASE network within the city has again been expanded, with three further corridors due to go live in March/April 2025. These three new routes will complement our existing extensive network of ASE on key corridors across the city.
- 1.15. In 2025/26 the Council will, in partnership with West Midlands Police, undertake a review of the existing ASE corridors, several of which have now been in situ for multiple years. West Midlands Police is the enforcement agency for the ASE programme, and as such is responsible for the issue and collection of speeding fines. A regional review of the ASE programme is also underway which will consider the potential for further development of enforcement activity to include red-light camera enforcement.
- 1.16. School-based initiatives: Supporting road safety and speed compliance at and around school sites continues to be a major priority and as part of the 2025/26 programme several school-based initiatives and interventions will be prioritised. This includes the expansion of the School Streets programme, the provision of enhanced pedestrian facilities and the introduction of 20mph speed limits outside schools.
- 1.17. Mini-speed visor programme: In 2024/25 the Council's mini-speed visor programme was launched, expanding use of vehicle actuated signs to improve compliance with speed limits. This programme is due to be expanded in 2025/26 and will form part of a suite of community focused interventions delivered through the Traffic Management portion of the LNIP.
- 1.18. Urban Traffic Management and Control (UTMC): The UTMC system operating in the city comprises signal-controlled junctions, pedestrian and cycle crossings, CCTV cameras monitoring traffic conditions, and variable message signs. These tools are

used to help manage traffic on the city's network as efficiently as possible, and continual investment is required to ensure they are fit for purpose and support the Council's statutory network management responsibilities.

- 1.19. The UTMC investment programme for 2025/26 includes measures to improve the operation of traffic signals across the network, including upgrades to LED technology, which is more reliable, enhances visibility, and reduces energy use by up to 75% (compared to traditional halogen heads). Signal upgrades will be carried out at four sites, introducing controlled pedestrian facilities at Cox Street, Swanswell Street, Tile Hill Lane and Banner, Lane, delivering improvements for pedestrians. Several of the proposals set out in the programme are intended as multi-year programmes and as such will be carried forward across years.
- 1.20. Crossing and signal upgrades: In 2025/26 the remaining Pelican Crossing sites in operation across the city will be upgraded to Puffin facilities. These upgrades are funded by the Traffic Signal Obsolescence Grant and Green Light Fund, with the first of the nine sites due to be upgraded being completed in January 2025. The remainder of the sites are scheduled for delivery in the first half 2025, while an additional element of the grant award managed by Transport for West Midlands will also be utilised to upgrade existing signal and Puffin sites at several locations.

Highways maintenance

- 1.21. Highways maintenance includes repairing roads and pavements, as well as carrying out preventative maintenance. In 2024/25 the highways maintenance programme included treating approximately 20km of carriageway and 16km of footway.
- 1.22. It should be noted that in 2022/23 significant price increases due to inflation, coupled with accelerated deterioration across parts of the network, created a £2m pressure on the highway maintenance programme, with some schemes being deferred to 2023/24. To address this, the Cabinet Member for City Services agreed to bring forward £1m from future years CRSTS funding, to be paid back over the following 4 years at £250,000 per year. Taking this reduction into account, the CRSTS allocation for highways maintenance in 2025/2026 is £3.8m.
- 1.23. In addition to this, the recent CRSTS reprofiling exercise made a further £3.3m available for highways maintenance in 2025/26. A significant element of this funding will be used to improve the condition of pavements and cycleways, which is essential for promoting active travel and providing safer facilities for vulnerable people. This is further supplemented by £1.5m of funding secured from DfT and £2m of local funding.
- 1.24. Right to Buy receipts of £1.4m from the Citizen Housing Group will also be used to provide a further programme of highway improvements in and around Citizen estates across the City. This will be the eleventh year of improvements funded from Right to Buy receipts. The fund has now contributed to a significant investment, which equates to 85km of treated pavements and roads.
- 1.25. This provides a total budget of £11.9m for highways maintenance in 2025/26. The table below provides a high-level summary of this programme. More detailed descriptions of the types of works which will be carried out under each heading are provided in Appendix

2, while the locations at which these works will be carried out are set out in Appendix 3.

1.26. The proposed programme focuses on ensuring that the worst affected roads and pavements across the city are properly repaired and that preventative maintenance is carried out. This is a key theme in the West Midlands Local Transport Plan and is also driven by the City Council's Highways Infrastructure Asset Management Policy and Strategy (January 2016).

	CRSTS	CRSTS rebasing	DfT funding	CCC funding	Citizen	TOTAL
Planning and patching				£950,000		£950,000
Resurfacing	£605,400	£1,350,000	£760,000	£250,000		£2,965,400
Surface treatments		£750,000	£500,000	£200,000		£1,450,000
Footway improvement schemes	£1,000,000	£650,000	£200,000	£250,000		£2,100,000
Retread		£500,000				£500,000
Verges				£100,000		£100,000
Vehicle safety fence	£150,000					£150,000
Structures	£700,000					£700,000
Drainage surveys/maintenance	£1,381,000			£219,000		£1,600,000
Citizen					£1,400,000	£1,400,000
TOTAL	£3,836,400	£3,250,000	£1,460,000	£1,969,000	£1,400,000	£11,915,400

1.27. Cabinet is requested to approve delivery of both the LNIP and highways maintenance programmes.

Active Travel Fund 5 (ATF5)

1.28. ATF is a further source of funding which is used to develop and deliver transport schemes that promote walking and cycling. In November 2024, it was confirmed that the WMCA would receive £5.2m under ATF5 to deliver schemes during 2025/26 and 2026/27. The WMCA is still in the process of determining how this funding will be spread across the region and which specific schemes it will fund.

1.29. The Council is currently seeking up to £2m of this funding to deliver the following schemes:

Scheme	Cost
Completion of the Coundon Cycleway (200m section connecting end of current route at Chester St with pedestrian/cycle overbridge at A4053)	£350,000
Signalised road crossings connecting the existing Coundon Cycleway and planned Coundon Park Cycleway to other routes and residential areas	£469,147

New signalised road crossings to improve access for pedestrians and cyclists at various other locations	£918,583
2 additional School Streets schemes	£80,000
Maintenance improvements to existing cycle and walking routes	£160,000
TOTAL	£1,977,730

1.30. As noted above, it is not yet known which/how many of the above schemes will be funded from the WMCA's overall ATF5 allocation. Cabinet is therefore requested to delegate authority to the Director of City Services and Commercial to accept this funding (once this is confirmed), to add funded schemes to the capital programme and to approve their delivery.

Future funding arrangements (Integrated Settlement)

1.31. From 2025/26 funding from various sources is being amalgamated and will be given to the WMCA as part of a single 'Integrated Settlement'. This includes funding for transport as well as economic development, adult skills, housing, regeneration and retrofit. This approach is intended to give the WMCA greater flexibility over how it uses more of its available funding in the future.

1.32. A separate Cabinet Report provides more detail on the Integrated Settlement. However, at this stage it will cover a single financial year only, with the following sources of transport funding being included in 2025/26. It should be noted that the ATF elements of the Settlement are additional to the previously announced allocation for ATF5, (see Sections 1.28 to 1.30), which will continue to be administered separately.

Previous funding source	Capital/ Revenue	Funding for 2025/26
Bus Service Improvement Plan	Revenue	£37,066,610
Bus Service Improvement Plan Capability and Capacity	Revenue	£125,000
Bus Service Operators Grant	Revenue	£1,792,259
Bus Service Operators Grant Plus	Revenue	£11,000,000
Active Travel Fund	Capital	£12,341,244
Active Travel Capability Fund	Revenue	£3,615,215
Local Electric Vehicle Infrastructure fund	Capital	£493,640

1.33. In total therefore, the Integrated Settlement includes £66.4m worth of transport funding for 2025/26, to be spent across the region as a whole. While much of this is likely to be retained by TfWM to support the delivery of bus services in the region, it is anticipated that some money will be made available to fund further improvements to active travel and electric vehicle charging infrastructure in Coventry.

1.34. It is not yet known exactly how much of this funding will be allocated to Coventry, or which projects these will be used to fund. Cabinet is therefore not being asked to make any decisions regarding this funding at this time.

1.35. It should be noted that in the longer-term it is intended that the Integrated Settlement will become a multi-year settlement between the WMCA and central Government and will also include future rounds of CRSTS.

2. Options considered and recommended proposal

- 2.1. Cabinet is recommended to approve delivery of the 2025/26 programmes of local network improvements and highways maintenance schemes. This is recommended to secure £15m worth of investment in maintaining and improving the city's highway network and improving road safety.
- 2.2. Appendices 1 – 3 set out the specific works that will be carried out under each of these programmes, if they are approved. If these are not approved in their current form, there would need to be a delay in starting the programmes to allow further work to place and there would be a risk that not all work would not be completed in required time.
- 2.3. Cabinet is also recommended to delegate authority to accept any funding that is secured via this Active Travel Fund Tranche 5 up to a maximum sum of £2.5 million pounds, to add any schemes which receive sufficient funding to the five-year capital programme and approve their delivery. This is recommended to accelerate delivery of any schemes which receive sufficient funding, ensuring that these can also be delivered within the required timescales.

3. Results of consultation undertaken

- 3.1. A public consultation was carried out prior to the Coventry Transport Strategy being adopted in 2022. The results of this were considered by Cabinet as part of the decision to adopt the Strategy. Where appropriate, separate consultations have also been/will also be carried out on the individual schemes prior to their implementation, with the precise details of this depending on the size and nature of the scheme.

4. Timetable for implementing this decision

- 4.1. If approved, the schemes described in Appendices 1 - 3 will be delivered over the 2025/26 financial year. It is therefore expected that all these schemes will be delivered by the end of March 2026.
- 4.2. If funding is secured, the schemes described in Section 1.29 of this report will be delivered over 2025/26 and 2026/27. It is therefore expected that fully funded schemes will be delivered by the end of March 2027.

5. Comments from Director of Finance and Resources and the Director of Law and Governance

5.1. Financial Implications

Approval is being sought to deliver a programme of local network improvements and highway maintenance schemes over 2025/26. The total cost of these schemes is £15m, comprised of £3.1m for local network improvements and £11.9m for highway

maintenance. Both programmes are fully funded, with the majority of the funding coming from CRSTS.

Cabinet are also requested to delegate authority to the Director of City Services and Commercial, following consultation with the Cabinet Member for City Services and the Director of Finance and Resources, to accept funding for a series of active travel schemes via ATF5. The Council is currently seeking up to £2m from this fund to deliver the schemes described in Section 1.29 of this report. It is not yet known how much of this funding will be secured and so delivery of these schemes is dependent on the level of funding which is ultimately secured.

The Transport Capital Programme detailed within this report is consistent with the City Services element of the 5-year Capital Programme 2025-26 to 2029-30, approved by Council in the 2025-26 Budget Report on 25th February 2025.

5.2. Legal Implications

5.2.1 The Council has various statutory duties relevant to this report. These include:

- Maintaining the City's adopted highway network and associated structures
- Maintaining the City's traffic management infrastructure
- Managing the City's road network to secure the expeditious movement of traffic
- Promoting/encouraging safe, integrated, efficient and economic transport facilities and services in conjunction with TfWM
- Investigating road accidents and introducing measures to reduce their recurrence
- Producing a definitive map recording all public rights of way in the City
- Acting as a 'risk management authority' in respect of highway drainage for the purposes of the Flood and Water Management Act 2010.

5.2.2 The delivery of the proposed schemes is therefore intended to ensure that the Council meets these statutory duties.

5.2.3 The Council also has various statutory powers which allow it to improve or add to the existing highway/traffic management infrastructure and which will be relied on to deliver these programmes.

5.2.4 Where the delivery of the programmes of local network improvements and highways maintenance schemes, as set out in Appendices 1 - 3 of the report require any procurement exercise, such exercise will be undertaken in accordance with the applicable procurement regulations (including the Procurement Act) and contract procedure rules (as applicable).

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 Coventry Transport Strategy is closely aligned with the One Coventry Plan. In particular, the four objectives which the Strategy is built around (supporting the city's economic recovery and enabling long-term growth, delivering a sustainable, low

carbon transport system, ensuring equality of opportunity and maximising health and wellbeing and reducing health inequalities) are very closely aligned with those that are described in the One Coventry Plan.

Achieving all these objectives requires a change in the way in which people travel to, from and around Coventry. The schemes contained in the Transport Capital Programme support the implementation of the Coventry Transport Strategy and are therefore intended to help bring about this change.

6.2. How is risk being managed?

Individual schemes/programmes are subject to the Council's usual governance and risk management arrangements. This is proportionate to the stage of development/delivery which they are at and the level of spend associated with them.

For example, at an officer level, the Transport Capital Programme Board maintains oversight of all capital schemes that are delivered directly by the Council.

6.3. What is the impact on the organisation?

None

6.4. Equalities / EIA?

An Equalities Impact Assessment (EIA) was carried out prior to the Coventry Transport Strategy being adopted in 2022. This EIA remains current and covers the activity described in this report.

However, it should be noted that larger individual schemes are also subject to their own EIAs.

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

The decarbonisation of the transport system is at the heart of the Coventry Transport Strategy, with delivering a sustainable, low carbon transport system being one of its four core objectives. The programmes described in this report are therefore intended to contribute to this goal.

This approach is critical to enable Coventry City Council to achieve its carbon emissions reduction targets and the objectives of the emerging Climate Change Strategy and One Coventry Plan.

6.6. Implications for partner organisations?

None

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

Theme definitions

Local Safety Schemes	Road safety interventions based around priority sites including, site investigation and scheme development and implementation. To include road layout safety improvements, speed management including vehicle actuated sign and ASE scheme extension (subject to WMP approval), and delivery of school streets phase 3.
Vulnerable Road Users	Measures focused on improving the safety and experience for vulnerable road users. To include pedestrian improvements, new crossing facilities and school related initiatives such as 20mph speed limits.
Traffic Management	Provision of schemes and initiatives to aid the operation and efficiency of the network. To include junction improvement schemes, Moving traffic enforcement, traffic regulation orders and minor community lead interventions.
UTMC	Urban Traffic Management and Control focused enhancements and upgrades. To include LED upgrade to existing sites, including energy efficiency, and operational improvements, upgrade of pvms units, upgrade of crossing sites with installation of pedestrian crossing facilities.
UTMC TSO GLF	Crossing and signal upgrades and improvements funded through the DfT Green Light Fund allocation to CCC.

Ref	Theme	Project	Scheme Title	Description
LNIP25/26-01	Local Safety Schemes	Local Road Safety Improvements	Longford Road	Corridor review, site investigation of potential point interventions.
LNIP25/26-02	Local Safety Schemes	Local Road Safety Improvements	Craven Street	Corridor review, site investigation of potential point interventions.
LNIP25/26-03	Local Safety Schemes	Local Road Safety Improvements	Proffitt Avenue	Extension of existing traffic calming on Proffitt Avenue.
LNIP25/26-04	Local Safety Schemes	Local Road Safety Improvements	Hipswell Highway	Provision of Vehicle Actuated Signs.
LNIP25/26-05	Local Safety Schemes	Local Road Safety Improvements	Jobs Lane	Provision of Vehicle Actuated Sign and associated signing improvements.
LNIP25/26-06	Local Safety Schemes	Local Road Safety Improvements	Radford Road	Corridor Review, introduction of traffic management and signalling improvements.
LNIP25/26-07	Local Safety Schemes	Local Road Safety Improvements	Donnington Avenue	Site review and options scoping.
LNIP25/26-08	Local Safety Schemes	School Street Projects	School Streets Phase 3	Delivery of schools streets at 2 further sites.
LNIP25/26-09	Local Safety Schemes	ASE Programme Delivery	ASE Programme (Extension)	Review of existing corridors and extension at Bennetts Rd S (subject to WMP support).
LNIP25/26-10	Local Safety Schemes	Local Road Safety Improvements	Stoney Stanton Road	Site review and options scoping.
LNIP25/26-11	Local Safety Schemes	Local Road Safety Improvements	Tile Hill Lane	Site review and options scoping.
LNIP25/26-12	Vulnerable Road User	Crossing Improvements	Hinkley Road	Pedestrian crossing review and assessment.
LNIP25/26-13	Vulnerable Road User	Crossing Improvements	Wolfe Road	Measures to aid pedestrian access including splitters and pedestrian refuge.
LNIP25/26-14	Vulnerable Road User	Crossing Improvements	Brays Lane at Sacred Heart	Investigation and provision of new Zebra crossing.
LNIP25/26-15	Vulnerable Road User	Crossing Improvements	Tile Hill Lane and Station Avenue	Investigation and provision of new Zebra crossing.
LNIP25/26-16	Vulnerable Road User	Crossing Improvements	Harefield Road at Brays Lane	Junction narrowing to aid pedestrian use.
LNIP25/26-17	Vulnerable Road User	Crossing Improvements	Hen Lane at Briscoe Road	Review of existing pedestrian facility in order to aid operation.
LNIP25/26-18	Vulnerable Road User	School Related Improvements	Pinley Fields at Stoke Aldermoor	Signage and lining improvements and consideration for School Street.
LNIP25/26-19	Vulnerable Road User	School Related Improvements	Upper/Lower Eastern Green Lane at Alspath Lane	Pedestrian improvements.
LNIP25/26-20	Vulnerable Road User	School Related Improvements	Lythalls Lane at Gateside Road	Pedestrian improvements.
LNIP25/26-21	Vulnerable Road User	School Related Improvements	Coundon Road	School time advisory 20mph.
LNIP25/26-22	Vulnerable Road User	School Related Improvements	Aldermans Green Road	School time advisory 20mph.
LNIP25/26-23	Vulnerable Road User	School Related Improvements	Dewsbury Avenue	Provision of wigwags/VAS.
LNIP25/26-24	Vulnerable Road User	School Related Improvements	Ringwood Highway	Provision of wigwags/VAS.

LNIP25/26-25	Traffic Management	Junction Improvements	Lawrence Saunders Road at Crampers Field	Junction improvement scheme.
LNIP25/26-26	Traffic Management	Junction Improvements	Lawrence Saunders at Poole Road	Junction improvement scheme.
LNIP25/26-27	Traffic Management	Junction Improvements	Alderminster Road at Sutherland Avenue	Junction improvement investigation and improvements.
LNIP25/26-28	Traffic Management	Traffic Regulation Orders	Moving Traffic Enforcement	Introduction of MTC enforcement of right turn ban at Walsgrave Rd at Briton Rd.
LNIP25/26-29	Traffic Management	Traffic Regulation Orders	Traffic Regulation Orders	Progression of TROs including residents parking schemes/speed limit changes.
LNIP25/26-30	Traffic Management	Traffic Management Improvements	Traffic Management Community Led Interventions	Minor interventions driven by community feedback.
LNIP25/26-31	Traffic Management	Traffic Management Improvements	Dropped Crossing, H-Bars Etc	Provision of point interventions to aid access.
LNIP25/26-32	UTMC	Way Finding Improvements	PVMS 4 signs	Provision of variable message signs to aid driver awareness and route choice.
LNIP25/26-33	UTMC	Crossing Improvements	Burnaby Road at Catesby Road	Full signal site upgrade.
LNIP25/26-34	UTMC	Crossing Improvements	Cox St at Swanswell Street	Full upgrade of signal site with new additional controlled pedestrian facilities.
LNIP25/26-35	UTMC	Crossing Improvements	Tile Hill Lane at Banner Lane	Full upgrade of signal site with new additional controlled pedestrian facilities.
LNIP25/26-36	UTMC	Crossing Improvements	Mile Lane at shuttle bridge	Full signal site upgrade.
LNIP25/26-37	UTMC	Signal Upgrades	Tile Hill Lane at Templar Avenue	LED upgrade to existing signal sites.
LNIP25/26-38	UTMC	Signal Upgrades	Beake Avenue at Parkgate Road	LED upgrade to existing signal sites.
LNIP25/26-39	UTMC	Signal Upgrades	Holbrook Lane near Colledge Road Dual	LED upgrade to existing signal sites.
LNIP25/26-40	UTMC	Signal Upgrades	Charter Avenue near Sir Henry Parks Road	LED upgrade to existing signal sites.
LNIP25/26-41	UTMC	Signal Upgrades	Charter Avenue near Mitchell Avenue	LED upgrade to existing signal sites.
LNIP25/26-42	UTMC	Signal Upgrades	Austin Drive	LED upgrade to existing signal sites.
LNIP25/26-43	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Holbrook Lane at Burnaby Road	Pelican upgrade to Puffin.
LNIP25/26-44	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Foleshill Road at Beresford Avenue	Pelican upgrade to Puffin.
LNIP25/26-45	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Walsgrave Road at Burns Road West	Pelican upgrade to Puffin.
LNIP25/26-46	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	St James Lane at Remembrance Road	Pelican upgrade to Puffin.
LNIP25/26-47	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Tile Hill Lane at Limbrick Avenue	Pelican upgrade to Puffin.
LNIP25/26-48	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Tile Hill Lane at Beechtree Avenue	Pelican upgrade to Puffin.
LNIP25/26-49	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Kirby Corner Road	Pelican upgrade to Puffin.
LNIP25/26-50	UTMC - TSO (GLF) - CCC Grant	Signal Upgrades	Broad Lane at Farcroft Avenue	Pelican upgrade to Puffin.
LNIP25/26-51	UTMC - TSO (GLF) - WMCA Grant	Signal Upgrades	A444 Bell Green Signals and Puffins Crossings	LED upgrade to existing signal sites.

Note: None of the schemes included in the appendices are in priority order. All locations could be subject to change or possible delays due to engineering difficulties.

Appendix 2: Description of Maintenance Schemes

Highways Maintenance

The maintenance treatment programmes, as shown in Appendix 3, are aimed at providing the most appropriate treatments to the classified and unclassified road network. The opportunity will also be taken to link the implementation of road maintenance, integrated transport projects and public realm projects together to lower costs and minimise disruption.

It is important to note that exact limits for the extended pavement programme are not provided in this report, due to volume of extra preparation work.

As shown in the report there is also an extra £1.4m provided by Citizen Housing Group for pavements and highway network improvements this year, which is provided from the Right to Buy Infrastructure Fund.

Pavement Treatments

Pavement Reconstruction: A scheme of work which will often include excavation of kerb lines, relaying or renewing of kerbs, replacement of slabs or tarmac and supporting layers. This restores the treated area to 'as new' condition. Some tarmac pavements can be 'overlaid', this is where a further layer of tarmac is laid over the top of the existing surface, adding strength to the pavement.

Pavement Slurry Seal (tarmac pavements): A process where a 'slurry' containing bitumen is spread across the existing tarmac. The process is thin, up to 10mm, so there are no problems meeting existing levels. This process is used on sites where early signs of deterioration are evident and hence is an excellent preventative maintenance treatment.

Pavement treatments vary in cost from around £13 per square metre for slurry seal up to £140 per square metre for full reconstruction. Reconstruction is very labour intensive which results in higher costs relative to road resurfacing work.

Road Treatments

Road Planing and Patching: This method of repair is best suited to those roads where there are larger (greater than 10 square metres) areas of deterioration, often at junctions and turning heads or where there are problems with old utility reinstatements. The process entails removing the top 40mm (or whatever is appropriate) and inlaying new material. Typical cost is £52 per square metre. This treatment has the added advantage of forming part of the preparation process for future preventative maintenance surface treatment schemes. Roads which have been planed and patched are very suitable for surface dressing or micro asphalt the following year. The Plane and Patch operation offers the flexibility to carry out large permanent repairs to roads which deteriorate quickly for any reason.

Road Resurfacing: This treatment is split into two types, inlay and overlay. Best value is achieved with overlay and, where possible, this is the preferred approach.

Inlay: This is an inherently expensive approach and will be used only where absolutely necessary, usually where there has been a structural failure in the base layers. It is recognised that there are a few locations where a deeper repair is essential. The costs of this approach can be over £75 per square metre.

Overlay: For roads where the deterioration is confined to the upper layers of the carriageway, a good solution is to overlay. Similarly to pavement overlay, an extra layer of tarmac is laid over the existing surface. To maintain kerb height, it is usually necessary to plane out adjacent to the carriageway edges. The advantage of this approach is that it increases the thickness of tarmac, thereby strengthening the carriageway and reducing the amount of material that has to be taken away. For roads in poor repair, pre-patching is necessary. Typical costs are £57 per square metre.

Surface Treatments: All of the above processes extend the life of a road by a number of years and this life can be extended further by the application of surface dressing or other surface layer systems such as a Micro Asphalt. The importance of surface treatments is that they provide waterproofing to the road surface and prevent the ingress of water. In winter, water significantly contributes to deterioration and can cause weaker surfaces to break up. Surface treatments help to prevent this process occurring.

This year continues the successful programme of preventative maintenance. The value of this approach can be seen from the fact that surface dressing costs around £15 per square metre and Micro Asphalt is typically £20 per square metre, compared to over £57 per square metre for resurfacing.

Drainage Surveys/Maintenance

Capital maintenance schemes for drainage includes the repair, renewal of piped systems, new gullies and connections to the main sewer and often can involve the laying of new highway drains. These works address capacity or damage issues which are usually evidenced by flooding on or adjacent to the Highway. The Council's annual CCTV programme surveys the Highway drainage network and highway culverts and helps to build the asset register.

Flood Relief Schemes

The purpose of these schemes is to reduce the risk of flooding in known high risk areas. Such works are usually carried out in conjunction with the Environmental Agency (EA). To reduce risk at source, flood reduction measures can entail construction of storage areas on the Highway or private land, e.g. ponds, swales and ditches for slow release. Other measures include naturally slowing flows using a technique known as Natural Flood Management (NFM), using tree and hedge planting together with other natural obstacles. Other measures such as Property Flood Resilience (PFR) planned for rollout provide resilience to internal flooding during extreme events.

Verges

This programme allows for the protection of verges, typically through the use of bollards in accordance with the adopted verge policy. It may also include provision of lay-bys or simply re soiling existing verges, where new protective measures are in place. Use of grass-grid type materials continues to be successful. These systems allow vehicle over- run whilst maintaining a green verge like appearance to the street scene.

Vehicle Safety Fences

This allocation is used to maintain existing safety fences (Vehicle Restraint Systems) on the network and can include bridge parapets. The budget allows for the testing and replacement of lengths of fencing to meet modern standards.

Structures

We continue to provide a programme of capital maintenance across over 300 structures which comprise road bridges, culverts, footbridges, retaining walls, sign gantries and subways. Schemes cover a wide range of maintenance works, including strengthening, waterproofing, repair of structural elements, and replacement of movement joints. The programme also includes detailed structural inspections and assessments of substandard structures. It should be noted that all locations are subject to detailed investigation and possible delays caused by engineering difficulties/consultation issues.

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Road Resurfacing

ROAD NAME	FROM	TO	WARD
WALL HILL ROAD	HAWKES MILL LANE	OUNDON WEDGE DRIVE	BAB
OUNDON WEDGE DRIVE	RBT W/WALL HILL ROAD		BAB
A45	OAK LANE	BOUNDARY (OUTBOUND - EXACT LOCATION TBC)	BAB
HILLMORTON ROAD	ALMOND TREE AVENUE	149	HEN/LON
MILVERTON ROAD	HILLMORTON ROAD	WAPPENBURY ROAD	HEN
HOLBROOK WAY	RAILWAY BRIDGE	HOLBROOK LANE	HOL/FOL
KINGSBURY ROAD	FULL LENGTH	-	SHE
BERRY STREET	FULL LENGTH	-	STM
KING WILLIAM STREET	FULL LENGTH	-	STM
WALSGRAVE ROAD	VARIOUS	-	STM/LWS/UPS
RING ROAD	VARIOUS	-	STM
BEANFIELD AVENUE	FULL LENGTH	-	WAI
CURRIERS CLOSE	FALKLAND CLOSE	END	WES
UPPER/LOWER EASTERN GREEN LANE	FULL LENGTH	-	WOO

Road Surface Treatment – Surface Dressing

ROAD NAME	FROM	TO	WARD
EXMINSTER ROAD	FULL LENGTH (EXCLUDING SPUR SECTION)	-	CHE/EAR
FORELAND WAY	FULL LENGTH	-	HOL
LEACREST ROAD	FULL LENGTH	-	HOL
POULTNEY ROAD	FULL LENGTH	-	RAD
CLAYTON ROAD	FULL LENGTH	-	SHE
HARNALL LANE EAST	SWAN LANE	STONEWAY STATON ROAD	STM
HARTLAND AVENUE	FULL LENGTH	-	UPS
LITTLE FIELD	FULL LENGTH	-	UPS
GREEN LANE	ST MARTINS ROAD	KENPAS HIGHWAY	WAI
WESTWOOD HEATH ROAD	FULL LENGTH	-	WES
LYNDALE ROAD	WILDCROFT ROAD	DUNCHURCH HIGHWAY SERVICE ROAD	WHO
STONEBURY AVENUE	FULL LENGTH	-	WOO
HOCKING ROAD	FULL LENGTH	-	WYK

Road Surface Treatment – Micro Asphalt

ROAD NAME	FROM	TO	WARD
WASPERTON CLOSE	WILLENHALL LANE	END	BIN
SALCOMBE CLOSE	REMEMBRANCE CLOSE	END	BIN
FLECKNOSE STREET	FULL LENGTH	-	BIN
FLETCHAMSTEAD HIGHWAY (SERVICE ROAD - SIR HENRY PARKS ROAD)	FULL LENGTH	-	EAR
PARKSTONE ROAD	FOLESHILL ROAD	CLINTON ROAD	FOL
CARADOC CLOSE	HENLEY ROAD	END	HEN
HENLEY MILL LANE	HENLEY ROAD	NO. 39	HEN
WEAVERS WALK (SERVICE ROAD)	FULL LENGTH	-	LON
THE LINDFIELD (SERVICE ROAD)	FULL LENGTH	-	LWS
ENFIELD ROAD	DRONFIELD ROAD	HOLMFIELD ROAD	LWS
LABURNUM AVENUE	FULL LENGTH	-	SHE
MONKS ROAD	FULL LENGTH	-	STM
ROUGHKNOWLES ROAD	INCLUDING WHITEFIELD CLOSE		WES
DIAL HOUSE LANE	FULL LENGTH	-	WOO
UNICORN LANE	EASTERN GREEN ROAD	END	WOO

Road Plane and Patch

ROAD NAME	FROM	TO	WARD
KERESLEY ROAD	VARIOUS	-	BAB
WILLIAM BRISTOW ROAD	VARIOUS	-	CHE
QUINTON PARK	VARIOUS	-	CHE
LONDON ROAD	VARIOUS	-	CHE
BLACK PRINCE AVENUE	VARIOUS	-	CHE
BERKELEY ROAD SOUTH	VARIOUS	-	EAR
MOOR STREET	VARIOUS	-	EAR
BROAD STREET	VARIOUS	-	FOL
CROSS ROAD	VARIOUS	-	FOL
ANSTY ROAD	VARIOUS	-	HEN/UPS/LWS
HOLBROOK LANE	VARIOUS	-	HOL
PARKGATE ROAD	VARIOUS	-	HOL
HALL GREEN ROAD	VARIOUS	-	LON
BELL GREEN ROAD	VARIOUS	-	LON
YEW CLOSE	VARIOUS	-	LWS
CASH'S LANE	VARIOUS	-	RAD/FOL

WIDDRINGTON ROAD	VARIOUS	-	RAD/FOL
RADFORD ROAD	VARIOUS	-	RAD/SHE
BARRAS LANE	VARIOUS	-	SHE
HOLYHEAD ROAD	VARIOUS	-	SHE/BAB
BLACKBERRY LANE	VARIOUS	-	UPS/WYK
A45/WAINBODY AVENUE SOUTH JUNCTION	VARIOUS	-	WAI
KENSINGTON ROAD	VARIOUS	-	WHO
HIGHLAND ROAD	VARIOUS	-	WHO
SUTTON AVENUE	VARIOUS	-	WOO

Road Retread

ROAD NAME	FROM	TO	WARD
NORTH BROOK ROAD	FULL LENGTH	-	BAB
CLAREMONT WALK	FULL LENGTH	-	BAB
POTTERS GREEN ROAD	WOODWAY LANE	SCHOOL	HEN
SIDDELEY AVENUE	ARMSTRONG AVENUE	ALDERMOOR LANE	LWS
BRIXHAM DRIVE	BLACKBERRY LANE	BIDEFORD ROAD	UPS
FINGEST CLOSE	FULL LENGTH	-	WHO
FLAUNDEN CLOSE	FULL LENGTH	-	WHO
PEPYS CORNER	FULL LENGTH	-	WOO

Pavement Improvement Schemes - Reconstruction Schemes

ROAD NAME	WARD
BRUNTINGHORPE WAY	BIN
LANGBANK AVENUE / THE BARLEY LEA CYCLEWAY	BIN
MARY HERBERT STREET	CHE
ARNOLD AVENUE	EAR
EDMUND ROAD	FOL
MARDOL CLOSE	HEN
GLENN STREET	HOL
GAYER STREET	LON
DUDLEY STREET	LON
LONGFELLOW ROAD	LWS
GRANGEMOUTH ROAD	RAD
CATESBY ROAD	RAD

HOLYHEAD ROAD	SHE
KING WILLIAM STREET	STM
DEEGAN CLOSE	UPS
HATHAWAY ROAD	WES
BUCKINGHAM RISE	WHO
SUTTON AVENUE	WOO
WHITNASH GROVE	WYK

Pavement Improvement Schemes – Slurry Seal Schemes

ROAD NAME	WARD
BENNETTS ROAD SOUTH	BAB
HAWKES MILL LANE	BAB
ABBAY ROAD	CHE
THE AVENUE	CHE
RED LANE	FOL
GUILD ROAD	FOL
WINGFIELD WAY	HOL
PEMBURY AVENUE	LON
MILL STREET	SHE
EASTLANDS GROVE	SHE
UPLANDS	UPS
STOKE ROW	UPS
JACKLIN DRIVE	WAI
ROUGHKNOWLES ROAD	WES
WIMBORNE DRIVE	WYK

Verge Schemes

ROAD NAME	WARD
BLACKBERRY LANE	UPS
DAVENTRY ROAD	CHE
LION FIELDS AVENUE	BAB

Highway Structure Schemes

Road Name	Structure	Works	Ward
A4053, Ringway Swanswell	Swanswell Viaduct	Structural Assessment, concrete and expansion joint repairs	St. Michael's

A4053, Ringway Hill Cross	Hill Cross Flyover	Bridge deck and expansion joint repairs	St. Michael's / Radford /Sherbourne
Carey Street	Carey St Bridge	Strengthening	Longford
A4053, Ringway Rudge/ Hill Cross	Holyhead Rd Overbridges	Structural Assessment of post tensioned bridge decks	St. Michael's / Sherbourne
A4114, Pickford Way	Allesley By-Pass Footbridge	Structural Assessment of half joints and post tensioned beam	Bablake/ Whoberley
B4118 Lockhurst Lane/ Holbrook Lane	Lockhurst Lane Viaduct	Structural Inspection and Repairs	Radford/ Foleshill/ Holbrook
A444 Jimmy Hill Way	Various Retaining walls	Structural investigation and repairs	St Michael's/ Upper Stoke
Various City Wide	Various	Principal Inspections	Various

Drainage Schemes

Road Name	Description	Ward
Holbrook Lane	Improve drainage efficiency in this area by intercepting runoff from the adjacent park, introducing more road gullies, improve the efficiency of the culverted watercourse.	Holbrook
Cross Road	Installation of new gullies to increase drainage efficiency.	Foleshill
Headington Avenue	Installation of new gullies and improve drainage efficiency.	Bablake
Holbrook Way – Phase 2	Investigate condition of culvert and effect repairs.	Holbrook
Ainsley Road	Installation of new gully to increase drainage efficiency.	Earlsdon
Staircase Lane – Phase 2	Improvement works to the River Sherbourne bank to Improve drainage efficiency.	Bablake
Canley Road – Phase 2, Trash Screen replacement.	Removing the existing screen and replacing it with a new trash screen to improve flood protection.	Whoberley
Bedworth Road	Installation of new gullies and improve drainage efficiency.	Longford

Coundon Green	Installation of new gullies and improve drainage efficiency.	Bablake
Celilo Walk	Investigation and potential delivery of property flood resilience measures.	Holbrook
Broad Lane.	Investigation and potential delivery of property flood resilience measures.	Woodlands
Bennetts Road	Investigation and potential delivery of property flood resilience measures.	Bablake
The Riddings	Investigation and potential delivery of property flood resilience measures.	Earlsdon
Heybrook Close.	Investigation and potential delivery of property flood resilience measures.	Upper Stoke
Hall Green Road	Investigation and potential delivery of property flood resilience measures.	Longford
Honeysuckle Drive.	Investigation and potential delivery of property flood resilience measures.	Longford
Verbena Close.	Investigation and potential delivery of property flood resilience measures.	Longford
Duggins Lane	Investigation and potential delivery of property flood resilience measures.	Westwood
Citywide Gully Repairs	Citywide programme of localised drainage maintenance and repairs. 11 Identified to date.	Citywide
Citywide culvert asset surveys and repairs	Camera surveys of the citywide culverted watercourses to inform a programme of repairs. 10 Identified to date.	Citywide
Citywide Pumping Station Maintenance programme.	Routine repairs and equipment replacement at 3 pumping stations.	Citywide



Public report Cabinet

Cabinet
Council

18 March 2025
25 March 2025

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor N Akhtar

Director Approving Submission of the report:

Director of City Services and Commercial

Ward(s) affected:

All Wards

Title:

Homes in Multiple Occupation (HMOs) Development Plan Document (DPD) Adoption

Is this a key decision?

Yes - the proposals are likely to have a significant impact on residents or businesses in two or more electoral wards in the City

Executive Summary:

Homes in Multiple Occupation (HMOs) can provide important accommodation for a range of people including those entering the housing market. However, they can also bring significant disruption to settled neighbourhoods. In order to ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods a Development Plan Document (DPD) has been prepared. As background, the DPD and accompanying Sustainability Scoping / Appraisal were consulted upon between 20 September and 15 November 2022 at the Regulation 18 stage and between 27 March and 15 May 2023 at the Regulation 19 stage. These consultations were undertaken in the formulation of the DPD which was then submitted to the Planning Inspectorate in September 2023, with hearings held January 2024 and subsequent Main Modifications consultation held between 10 June and 22 July 2024.

This report provides an update on the Main Modifications consultation and the published Inspector's Report, in which the Inspector concluded, through independent Examination, that the HMO DPD is 'sound' and has been prepared in accordance with legal and procedural requirements subject to her recommendations (main modifications). The report therefore seeks agreement to adopt the Homes in Multiple Occupation (HMOs) Development Plan Document (DPD). If adopted, it will become part of the Development Plan for the city.

Recommendation:

Cabinet is requested to recommend that Council:

1. Notes the Inspector's Report on the Examination of the Homes in Multiple Occupation Development Plan Document (Appendix 1), and specifically that she has concluded that subject to her main modifications, the Plan meets the tests of soundness and has been prepared in accordance with legal and procedural requirements and thus is 'capable of adoption'.
2. Adopts the Homes in Multiple Occupation Development Plan Document (Appendix 2), in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 which will be the Plan submitted on 25 August 2023 as amended by the schedule of Main Modifications (Appendix 3) and Additional Modifications (Appendix 4).
3. Notes that the Equalities Impact Assessment (Appendix 5), Sustainability Appraisal report (Appendix 6), Sustainability Appraisal Adoption Statement (Appendix 7) and draft Adoption Statement (Appendix 8) will be published as soon as reasonably practicable after 25 March 2025 in accordance with Regulations 17 and 26 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).
4. Delegates authority to the Strategic Lead – Planning, following consultation with the Cabinet Member for Housing and Communities, to make further minor modifications to the Plan prior to final publication, where these modifications are confined to the correction of typographical errors, amendments to policy or paragraph reference numbers and consequential cross referencing, where appropriate.

Council is requested to:

1. Note the Inspector's Report on the Examination of the Homes in Multiple Occupation Development Plan Document (Appendix 1), and specifically that she has concluded that subject to her main modifications, the Plan meets the tests of soundness and has been prepared in accordance with legal and procedural requirements and thus is 'capable of adoption'.
2. Adopt the Homes in Multiple Occupation Development Plan Document (Appendix 2), in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 which will be the Plan submitted on 25 August 2023 as amended by the schedule of Main Modifications (Appendix 3) and Additional Modifications (Appendix 4).
3. Note that the Equalities Impact Assessment (Appendix 5), Sustainability Appraisal report (Appendix 6), Sustainability Appraisal Adoption Statement (Appendix 7) and draft Adoption Statement (Appendix 8) will be published as soon as reasonably practicable after 25 March 2025 in accordance with

Regulations 17 and 26 of the Town and Country Planning (Local Planning) Regulations 2012 (as amended).

4. Delegate authority to the Strategic Lead – Planning, following consultation with the Cabinet Member for Housing and Communities, to make further minor modifications to the Plan prior to final publication, where these modifications are confined to the correction of typographical errors, amendments to policy or paragraph reference numbers and consequential cross referencing, where appropriate.

List of Appendices included:

Appendix 1: Inspector’s Report
Appendix 2: Homes in Multiple Occupation Development Plan Document - Adoption
Appendix 3: Schedule of Main Modifications
Appendix 4: Schedule of Additional Modifications
Appendix 5: Equalities Impact Assessment
Appendix 6: Sustainability Appraisal report
Appendix 7: Sustainability Appraisal Adoption Statement
Appendix 8: Draft Adoption Statement

Background papers:

None.

Other useful documents

HMO DPD website - <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

DPD and Article 4 Direction, August 2022 & Houses in Multiple Occupation – The Need for an Article 4 Direction, July 2022

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

Report to Cabinet and Council (30 August and 6 September 2022 respectively)
(Regulation 18)

Report to Cabinet and Council (14 March and 21 March 2023 respectively)
(Regulation 19)

Report to Cabinet Member (16 April 2024) (Main Modifications)

Has it been or will it be considered by Scrutiny?

Yes - The draft HMO DPD and associated Article 4 Direction was considered by the Communities and Housing Scrutiny Board (4) on 6 October 2022

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

Yes:

Cabinet Member for Housing and Communities – (Main Modifications) 16 April 2024 - <https://edemocracy.coventry.gov.uk/ieListDocuments.aspx?CId=739&MId=13166&Ver=4>

Will this report go to Council?

Yes – 25 March 2025.

Report title: Homes in Multiple Occupation (HMO) Development Plan Document (DPD) Adoption

1. Context (or background)

- 1.1 Homes in Multiple Occupancy (HMOs) are dwellings where unconnected individuals live with communal facilities. They provide important accommodation for a range of individuals with a range of different needs, including entry-level housing. However, they can also bring significant disruption to settled neighbourhoods. In order to ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods a draft Development Plan Document (DPD) (Regulation 18), was consulted upon between 20 September and 15 November 2022 which identified the key issues and proposed a series of planning policy responses which provide a far more detailed framework for assessing planning applications that that currently provided for through Policy H11 of the adopted Local Plan.
- 1.2 Following consideration of representations on the Issues and Preferred Option, work commenced on the Publication HMO DPD (Regulation 19). The evidence base which supported the HMO DPD was updated in relation to the Duty to Cooperate and Sustainability Appraisal. The above evidence combined with the previous consultation responses at Regulation 18 stage informed a secondary public consultation, known as Regulation 19, which was published between 27 March 2023 to 15 May 2023.
- 1.3 As a result of the consultation and comments received, a suite of modifications to the DPD were identified and submitted to the Planning Inspectorate to help assist the Inspector in understanding the Councils position based on the representations received to the Regulation 19 consultation. Council agreed on the 21st March 2023 that the HMO DPD and accompanying documents be submitted to the Planning Inspectorate at the earliest opportunity following the conclusion of the publication (Regulation 19) period.
- 1.4 The Council formally submitted the HMO DPD for Examination in Public on 25 August 2023. The Examination Hearings took place on 23 January 2024 which culminated in the production of a schedule of Main Modifications to the HMO DPD. The Main Modifications were published for a statutory six week period of public consultation in accordance with legislative requirements and in accordance with the Councils adopted Statement of Community Involvement (SCI) between 10 June and 22 July 2024.
- 1.5 In addition, to the Main Modifications, the Council also developed a schedule of additional modifications which and were published alongside the schedule of Main Modifications. However, these additional modifications were non – substantive for example to correct typographical errors and make factual corrections and were not before the Inspector for consideration but were published for completeness.
- 1.6 On 4 November 2024 Council officers received the Inspectors final report (see Appendix 1) together with the suite of main modifications (MMs) (see Appendix 3). The Inspector has concluded:

“The Council has requested that I recommend MMs to make the DPD sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended MMs set out in Appendix 1, the Coventry City Homes in Multiple Occupation Development Plan Document satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound”.

2. Options considered and recommended proposal.

- 2.1 In light of the Inspector’s report, the Council now has to decide whether it wishes to formally adopt the DPD forming part of the Development Plan for the city. In doing so, the Council can only adopt the Plan with the agreed Main Modifications, recommended by the Inspector together with the agreed Additional Modifications.

Do Nothing (Not Recommended)

- 2.2 An alternative option is for Cabinet to recommend to Council not to adopt the DPD. Non-adoption is not recommended as there would remain a lack of robust policy to assist with the determination of planning applications for HMO proposals. It would also mean that significant resources would have been wasted on the development of this DPD policy document.

Adopt the DPD (Recommended)

- 2.3 This would enable further elaboration on adopted Local Plan policy in line with its commitments. It will provide the necessary policy basis to help applicants so that they are clear about what is expected when bringing forward HMO proposals in the city.
- 2.4 This DPD will strengthen the Council’s ability to provide greater clarity and certainty in respect of the planning negotiation process and assist in accelerating the process of determining planning applications.

3. Results of consultation undertaken

- 3.1 Prior to receipt of the Inspectors report, the Council undertook a statutory public consultation in respect of the HMO DPD Main Modifications between 10 June and 22 July 2024. This consultation was carried out in accordance with the findings and subsequent modifications agreed with the Planning Inspector and in line with legislative requirements and the Councils adopted Statement of Community Involvement (SCI).
- 3.2 This consultation was not an opportunity to raise matters that either were, or could have been, part of the earlier representations or hearings on the submitted plan. Comments had to be focussed on matters of soundness. These are the issues on which the appointed Planning Inspector focused and considered before issuing the final report and whether the Council can proceed to adoption of the DPD. A total of five representations were duly made and submitted directly to the Planning Inspector for her consideration before issuing her final report.

4. Timetable for implementing this decision

- 4.1 Should Council approve the recommendations set out in this report the decision will take effect from the following day (26 March 2025). The Council will issue the Adoption Notice and other supporting documents on its website and make them available in the relevant and necessary Council offices and local libraries. The new HMO Development Plan Document will then form a statutory basis for the determining planning applications in respect of Homes in Multiple Occupation across Coventry.

5. Comments from the Director of Finance and Resources and the Director of Law and Governance

5.1. Financial implications

The primary costs associated with the Adoption of the DPD is the publication of the documents for use by officers, Councillors and other stakeholders. These costs are considered minimal and will be funded from existing budget provisions. The preparation of the DPD to date has incurred costs through the development and examination process. These costs have already been incurred and are reported within the current financial year.

5.2. Legal implications

It is a statutory requirement for the Council, if it is to adopt the Homes in Multiple Occupation (HMOs) Development Plan Document, to do so in accordance with the Inspector's recommended Main Modifications (S23(2) Planning and Compulsory Purchase Act 2004, as amended).

The recommended adoption of the DPD means that it has been deemed to be sound and legally compliant in accordance with national legislation and guidance. If the recommendations are approved by Council, an Adoption Statement, a draft of which is included at Appendix 8, and Sustainability Appraisal report are required to be issued alongside the finalised Plans at the earliest convenience in accordance with Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This Statement is to be published on the Council's website and sent to all interested parties as well as the Secretary of State for their information.

The statutory legal challenge period is set out in Section 113 of the Planning and Compulsory Purchase Act 2004. Challenges should focus on the legal process and correctness, as opposed to matters of soundness. Challenges should be made promptly and directed to the High Court. Should the Development Plan Document be subject to legal challenge a further report will be brought before Council to outline the proposed timescale and process.

The decision to adopt the DPD is one that must be made by Full Council as the plan is a policy framework document.

Once adopted by the Council, the HMO DPD will become the starting point for

determining HMO planning applications that are submitted to the Council for consideration. Accordingly, the adoption of the HMO DPD as proposed in this report will ensure that future planning decisions and appeals can be robustly defended.

6. Other implications

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

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

6.2. How is risk being managed?

The primary area of risk now sits with the statutory legal challenge period. This remains open for a 6-week period and will run between the 26 March 2025 and 8 May 2025. Throughout the development of the HMO DPD, we have sought to undertake extensive engagement, consider all reasonable alternatives. This work has been undertaken over several years and has been with a view to minimising the risk of challenge. The Council's approach to the development of the DPD has been endorsed by the Inspector.

6.3. What is the impact on the organisation?

No direct impact.

6.4. Equality/ EIA

A full Equalities Impact Assessment (EIA) was undertaken as part of the development of the DPD and formed part of the Council's submission to the Secretary of State. This stage of the process will result in the adoption of the HMO DPD with no further changes or impacts on the aims, objectives and direction, therefore a further update of the EIA has not been deemed appropriate at this stage.

As part of developing its EIA considerations the Council has had due regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary, the HMO DPD advocates higher quality housing and management which helps to promote good relations between different communities in that it addresses some of the negative impacts of the over concentration of HMOs

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

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

6.6. Implications for partner organisations?

No direct impact.

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

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Report to Coventry City Council

by C Dillon BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Date: 4 November 2024

Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the Coventry City Homes in Multiple Occupation Development Plan Document

The Plan was submitted for examination on 25 August 2023

The examination hearing was held on 23 January 2024

File Ref: PINS/U4610/429/8

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Abbreviations used in this report

HMO	Homes in Multiple Occupation
HRA	Habitat regulations assessment
MM	Main modifications
SA	Sustainability appraisal

Non-Technical Summary

This report concludes that the Coventry City Homes in Multiple Occupation Development Plan Document provides an appropriate basis for the planning of Coventry, provided that a number of main modifications are made to it. Coventry City Council has specifically requested that I recommend any main modifications necessary to enable the Development Plan Document to be adopted.

Following the hearing, the Council prepared a schedule of the proposed Main Modifications and carried out further sustainability appraisal and screening under the habitats regulations. The main modifications were subject to public consultation over a six-week period. I have recommended their inclusion in the Development Plan Document after considering the findings of the sustainability appraisal and habitats regulations screening and all the representations made in response to the consultation.

The main modifications are summarised as follows:

- Revisions to Policy HMO1 so that the criteria are justified, relevant to the intended scope of the policy and consistent with Policy HMO4 and the supporting text.
- Amendments to Policy HMO2 to make it clear how 'over concentration' of Homes in Multiple Occupation will be determined.
- Revisions to Policy HMO3 to make it clear how planning applications will be determined where Homes in Multiple Occupation already exist in the locality.
- Amendments to Policy HMO4 so that the criteria are clear, effective and consistent with national policy; and
- The insertion of monitoring indicators and supporting text to ensure that the performance of Policies HMO1, HMO2, HMO3 and HMO4 can be assessed on an annual basis.

A number of other modifications are recommended to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the Coventry City Homes in Multiple Occupation Development Plan Document (DPD) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the preparation of the DPD has complied with the duty to co-operate. It then considers whether the DPD is compliant with the legal requirements and whether it is sound. Paragraph 35 of the National Planning Policy Framework (2021) (the Framework) states that in order to be sound, Plans should be positively prepared, justified, effective and consistent with national policy.
2. On 19 December 2023 a revised Framework was published. However, it includes a transitional arrangement which indicates that, for the purpose of examining this DPD, the policies in the 2021 Framework will apply. Therefore, unless stated otherwise, any references to the Framework in this report relate to the 2021 version.
3. The starting point for the examination is the assumption that Coventry City Council (the Council) has submitted what it considers to be a sound plan. The DPD, submitted on 25 August 2023, is the basis for my examination. It is the same document that was published for consultation in March 2023.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any Main Modifications (MMs) necessary to rectify matters that make the DPD unsound and /or not legally compliant and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM01**, **MM02** etc, and are set out in full in Appendix 1.
5. Following the examination hearing, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal and screening under the habitats regulations of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a development plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted plan.

7. In this case, the submission policies map comprises the plan identified as 'Coventry City Council Administrative Area/ Area Covered by the HMO DPD'. The published MMs do not require any changes to the submission policies map. When the DPD is adopted, in order to comply with the legislation and give effect to its policies, the Council will need to update the adopted policies map to include the changes proposed in the submission policies map.

Context of the DPD

8. The Coventry City Local Plan (2011-2031) was adopted in 2017. Since then, the City has continued to experience population growth at a rate which is faster than the national and regional averages. The Council recognises that there is a need to ensure that new development supports successful communities by ensuring the right mix of housing types in an area, securing appropriate design and supporting well managed properties. The Council also recognises that Homes in Multiple Occupation (HMOs) provide an important contribution to housing choice. However, there are mounting concerns from residents and stakeholders about adverse effects arising from changes within neighbourhoods where HMO concentrations are becoming more noticeable.
9. As a direct response, the DPD is intended to supplement the strategic policies of the adopted Local Plan and the City Centre Area Action Plan. It seeks to manage future proposals for HMOs which, regardless of size, fall under planning control following the recently adopted City-wide Article 4 Direction.

Public Sector Equality Duty

10. In examining the Plan, I have had due regard to the aims expressed in section 149(1) of the Equality Act 2010. The Council's Equality Impact Assessment (including Health Impact Assessment) provides an assessment of the DPD against a range of protected characteristics. In summary, I am satisfied that the Plan will not have any disproportionate or undesirable consequences for others as a result of protected characteristics.

Assessment of Duty to Co-operate

11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by section 33A in respect of the preparation of the DPD. The Council's Duty to Cooperate Statement (August 2023) sets out the scope of its engagement activities in this regard.
12. In summary, the Council has engaged with relevant neighbouring authorities in the preparation of the DPD. They have confirmed in writing that there are no strategic cross boundary matters that apply. I agree with this shared position. The Environment Agency and Historic England, who are prescribed bodies for

the purposes of the duty, have raised some concerns about the content of policies. However, these relate to soundness matters, rather than engagement in the preparation of the Plan, and are addressed elsewhere in this report.

13. In conclusion, where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the DPD. The duty to co-operate has been met.

Assessment of Other Aspects of Legal Compliance

Local Development Scheme

14. The Council's Local Development Scheme was published in early 2022. It was updated in November 2022 to reflect the decision to undertake a full review of the adopted Coventry City Local Plan. The timescales for the preparation of the DPD are contained within this scheme.
15. Consultation on the DPD at Regulation 18 stage took place in September 2022, as scheduled. The Publication draft was consulted on in March 2023, as scheduled. However, there has been some minor slippage in the anticipated timescale for submission and adoption of the DPD. The Scheme was revised during the examination, in February 2024, to reflect current timescales.
16. In conclusion, overall, the preparation of the DPD accords with the Council's adopted Local Development Scheme

Consultation

17. The Council's Regulation 22 Consultation Statement confirms that public consultation on the DPD has been carried out at each stage of plan preparation. All consultation material was made available online at the Regulation 18 and 19 stages.
18. A range of different approaches were used to encourage participation and responses. This included stakeholder meetings and briefings; seminars and presentations; conferences and workshops. A series of drop in sessions and exhibitions at libraries were also held. Emails or letters to those on the Council's consultation database were circulated. The Council also publicised the consultation through social media, leaflets and posters; press releases; media interviews and newspaper articles. A 'Frequently Asked Questions' document was made available to support all of this activity. Consultation responses were accepted by email, letter and through the Council's online consultation portal.

19. In conclusion, consultation on the DPD was carried out in compliance with the Council's adopted Statement of Community Involvement 2021 and meets the consultation requirements of the Regulations. Adequate opportunities were provided to allow people to participate in the plan-making process.

Sustainability Appraisal

20. The Council carried out a sustainability appraisal (SA) of the DPD. This work formed part of the plan making process. It led to the publication of a report of the findings of the appraisal on the submission DPD.
21. The SA assessed the policies of the DPD against a range of economic, social and environmental objectives. Reasonable alternatives were also considered including not preparing the DPD and having different thresholds and distances for the management of HMOs. The SA outcomes were used to inform the submitted DPD and were published along with the DPD and other submission documents under Regulation 19. A subsequent addendum¹ to the SA was published which assessed the implications of the MMs on sustainability objectives.
22. In conclusion, the Council's SA work provides a robust and proportionate assessment.

Habitat Regulation Assessment

23. In line with the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations), a Habitats Regulation Assessment (HRA) has been undertaken. Its findings are contained in the Council's SA Report and addendum and clearly justify that an Appropriate Assessment is unnecessary in this instance. Natural England have reviewed the HRA and raised no objections. Based on the evidence provided, I agree with that conclusion.

Other Legal Requirements

24. Regulation 8 (4) & (5) of the 2012 Regulations require that the policies of any new plan are consistent with the adopted development plan. The exception to this is where it is explicit that the new plan contains a policy that is intended to supersede a policy in the adopted development plan and that policy is identified. The DPD clearly sets out its supplementary role as part of the wider development plan for the City. The adopted plan includes policies to address the strategic priorities for the development and use of land in the local planning

¹ The Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA) Addendum Note (March 2024)

authority's area. The supplementary role of the DPD is consistent with these. As such, the DPD is consistent with sections 19(1B) and 19(1C) of the 2004 Act.

25. The DPD, as part of the wider development Plan for the City includes policies designed to secure that the development and use of land in the local planning authority's area which contribute to the mitigation of, and adaptation to, climate change. Policy HMO4 specifically seeks to respond to the effects of climate change. Therefore, the DPD is consistent with section 19(1A) of the 2004 Act.

Conclusion on Other Aspects of Legal Compliance

26. In overall conclusion, the DPD complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

27. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing, I have identified 3 main issues upon which the soundness of the DPD depends. This report deals with the main issues. It does not respond to every point or issue raised by representors, nor does it refer to every policy criterion.

Main Issue 1 – Whether the purpose and strategy of the DPD are justified and consistent with national planning policy

28. The purpose and strategy of the DPD is focussed on securing the appropriate management of the distribution, concentration and quality of HMO proposals. It is intended to supplement the Local Plan, the recently confirmed Article 4 Direction and the HMO licensing regime. This is to safeguard against adverse environmental effects and improve the quality of HMO accommodation across the City.
29. The Council has mapped the distribution and numbers of known HMOs within the plan area. Some residential areas of the City already have very high concentrations of HMOs. Elsewhere, HMOs are also becoming increasingly popular in peripheral locations away from the city centre. Furthermore, the Council's HMOs: The Need for an Article 4 Direction Report (July 2022) and The Supporting Case for HMOs Article 4 Direction Report (August 2022) recognise that a higher than average rate of population growth is taking place across the City. This is associated with the 'young professional' demographic and the expansion of local colleges and universities.

30. The adopted Local Plan has sought to manage the provision of new HMO accommodation, particularly through Policy H11. Nonetheless, the Council has recognised that the continued growth and distribution of HMOs has given rise to concentrations that can adversely affect neighbourhoods. Paragraphs 4.1- 4.3 of the DPD summarise the harmful impacts which include effects on local character and the living conditions of existing residents. The Council's position is supported by representations made by stakeholders, including the Police Authority, and local residents. The evidence provided in support of the Plan therefore justifies its role and function as a standalone DPD which sits alongside the Local Plan and is intended to raise the standards of new accommodation.
31. The strategy of the DPD is set across 4 policies. Policies HMO2 and HMO3 seek to manage the concentration and distribution of HMOs. Policies HMO1 and HMO4 provide assessment criteria to ensure that the living conditions of existing residents are maintained, the character of neighbourhoods is preserved, and a good standard of living accommodation is secured. The findings of the SA, Equality Impact Assessment and duly made representations have informed the identification of the preferred strategy for managing the location of new HMO proposals and the scope of relevant policy requirements.
32. Each of these 4 policies is consistent with both the purpose of the DPD and the Local Plan. Overall, the strategy of the DPD is justified. It is also consistent with paragraph 92 of the Framework, which requires planning policies to aim to achieve healthy, inclusive and safe places. The DPD does not seek to restrict new HMOs or introduce a ceiling, but to ensure that their concentration and distribution does not have harmful environmental effects. In this regard, there is no conflict with national policy.
33. In overall conclusion, the main issues facing the City associated with growth in HMO accommodation have been evidenced. The purpose and strategy of the DPD to address these are justified and consistent with national planning policy.

Main Issue 2 – Whether Policies HMO1 and HMO4 are a justified and effective means to manage the quality of HMOs and whether they are consistent with national planning policy

34. Through their criteria-based approach, Policies HMO1 and HMO4 set out requirements for HMO proposals. Policy HMO1 seeks to secure acceptable levels of accessibility, parking and living conditions for prospective and existing residents. It also seeks to avoid harm to the character and appearance of the area, heritage assets, and highway safety. Policy HMO4 sets out requirements to secure a good standard of HMO accommodation. The policy criteria seek to avoid harm in terms of the living conditions of all residents, design, crime, the significance of heritage assets and flood risk.

35. In principle, both policies are justified and consistent with the role and purpose of the DPD. Furthermore, their scope and objectives are consistent with national planning policy in terms of living conditions, design and crime prevention.
36. However, as submitted, both policies and the supporting text are unclear on the types of HMO proposals that they would apply to. To be effective, these policies need to state that they apply to both new HMOs and the intensification of existing HMOs which require planning permission. This is rectified by **MM01**, **MM02** and **MM08**. Further MMs are required to both policies as follows.
37. Criterion (a) of Policy HMO1 is unclear on what constitutes a 'good' level of accessibility and how that level will be assessed. For effectiveness, further clarification is provided through the supporting text by **MM03**. It states that factors to consider in determining applications will include whether proposals are within walking distance to public transport provision. It also sets out the type of documents that will be used for that assessment.
38. As submitted, Criterion (b) requires accordance with emerging national accessible homes standards. However, unless HMO proposals meet the definition of dwellings that arise from new build or material alterations, they will fall beyond the scope of these standards. This requirement is therefore more onerous than Building Regulations, without justification. Furthermore, the viability of this policy criterion has not been tested. It is therefore necessary to delete Policy HMO1(b) and renumber the remaining criteria accordingly. This is rectified by **MM02**.
39. Criterion (c) extends beyond the intended scope of Policy HMO1 into matters covered by Policy HMO4. In doing so, it contains repetition and inconsistency in respect of living conditions, character and appearance, highway safety and heritage assets. Furthermore, the reference made to the historic environment is inconsistent with the approach and language used in the Framework. For effectiveness and consistency with national policy, it is necessary to delete the references to living conditions, character and appearance, highway safety and heritage assets. This is rectified by **MM02**.
40. The Article 4 direction has been confirmed since the DPD was written. The resulting out of date references to it contained in the supporting text are a source of confusion for the interpretation of Policy HMO1 and the wider DPD. Consequently, it is necessary to update the existing position by **MM03** for effectiveness.
41. With regard to Policy HMO4, criterion (b) is imprecise in its reference to amenity and noise. This would hinder the correct application of the policy. To be effective, it is necessary to insert new wording through **MM08**. This makes it clear that it is the amenity of occupants of neighbouring properties and activity,

noise and disturbance arising from the HMO proposal itself that are the relevant policy considerations.

42. Criterion (b) is also imprecise about whether it extends to non-designated heritage assets. As worded, it does not reflect the language and approach of the Framework. To be effective and consistent with national policy, reference to 'designated' and 'non-designated' heritage assets are required by **MM08**. For the same reasons, and for effectiveness **MM08** also introduces language consistent with the Framework and the creation a separate criterion for heritage matters.
43. Criterion (c) of Policy HMO4 requires all proposals to take into account minimum room size requirements, which are defined by the policy itself. Amongst other things, Policy HMO4 states that rooms less than 4.64m² must not be used as sleeping accommodation. The minimum size requirements are an appropriate and justified mechanism to secure adequate standards of HMO accommodation. However, for effectiveness, further information relating to the standards is provided in the supporting text by **MM09**.
44. Criteria (e) is concerned with the provision of adequate external space for HMOs. However, in terms of refuse storage there is overlap with criterion (f) which, in turn, does not clearly articulate the required standards. **MM08** is therefore necessary for effectiveness. This MM addresses the overlap and clarifies that 'sufficient' refuse storage which is suitably 'located' is required. Furthermore, as car parking will only be required for some, not all proposals, **MM08** also makes the necessary distinction. In addition, to secure good quality design, **MM08** clarifies that outdoor space must be usable.
45. Criterion (f) is imprecise in its reference to Secured By Design as 'standards' and is unclear how adherence with these standards is to be demonstrated. To be effective, **MM08** is necessary so that Secured By Design is appropriately referred to as a set of principles; and a management plan which addresses these design principles is required in all instances.
46. Flood risk is referred to in the supporting text as a relevant issue. However, the wording of Policy HMO4 does not cover this consideration. In the interests of policy effectiveness, **MM08** inserts an additional criterion, (i), which requires the applicant to demonstrate how, in areas at risk of flooding, the safety of those ground floor occupants will be secured. **MM10** provides relevant supporting text which sets out the means by which this may be achieved. The Environment Agency have confirmed that subject to these changes, the policy is sound.
47. Finally, no means of monitoring the future performance of either policy has been included within the DPD. For effectiveness, it is necessary to insert a monitoring section including relevant indicators. This will enable the implementation of the

DPD to be monitored and any necessary future remedial action for the Council to be identified. This is rectified by **MM12**.

48. Subject to the recommended MMs, Policies HMO1 and HMO4 are a justified and effective means to manage the quality of HMOs and they are consistent with national planning policy.

Main Issue 3 – Whether Policies HMO2 and HMO3 are a justified and effective means to manage the distribution of HMOs and whether they are consistent with national planning policy

49. Policies HMO2 and HMO3 seek to avoid harmful concentrations of HMOs which can lead to adverse impacts on the character and appearance of neighbourhoods and the standard of living accommodation for existing residents. To achieve this, Policy HMO2 restricts new proposals where 10% or more of all dwellings falling within 100 metres of the application site are already HMOs. In addition, Policy HMO3 restricts proposals where it would result in a property becoming 'sandwiched' between 2 HMOs, or, where a proposal would lead to a continuous frontage of 3 or more HMOs. It lists 6 scenarios that represent the 'sandwiching' of single household properties between HMOs.
50. Paragraph 96 of the Framework states that planning policies should aim to achieve healthy, inclusive and safe places which, amongst other things, promote social interaction and are safe and accessible. Both policies support the principle of HMOs but seek to avoid harmful concentrations of similar development. Overall, I am satisfied that the policy approach is justified, reasonable and consistent with the aims and objectives of national planning policy. The approach will ensure a transparent, effective and consistent means of assessing future planning applications.
51. An alternative concentration percentage and distance for Policy HMO2 could have been used by the Council. However, those chosen were derived through the Council's spatial mapping and understanding of the potential adverse effects of high concentrations of HMOs. Challenges made to the preferred concentration and distance do not demonstrate that the policy is unsound. The Council's judgements and the threshold chosen are reasonable and justified.
52. However, the supporting text does not clearly convey the purpose and role of Policy HMO2. For effectiveness, **MM05** therefore states that because harm can arise from increased levels of anti-social behaviour and noise within the immediate vicinity of HMOs, and on routes linking them with the city centre, the policy seeks to ensure that potentially harmful concentrations do not arise and that existing living conditions of residents are maintained.

53. It is also unclear whether extant unimplemented planning permissions for HMOs should be factored into the calculation for assessing their proposed positioning within a street and resulting concentration. This could lead to an error or inconsistency in the calculation undertaken. For clarity and effectiveness to users of the DPD, **MM07** and **MM11** are therefore needed. They clarify that extant unimplemented planning permissions will be factored into the calculation.
54. To be effective, Policy HMO2 also needs to direct the reader to the intention that applications will not be 'permitted' where they conflict with the policy requirements. Furthermore, proposals are to be considered against all other relevant 'development plan' policies. **MM04** provides the appropriate clarity on these matters.
55. As for Policy HMO3, the reference to 'single residential properties' in scenario 1 and use of 'and' between each sandwiching scenario cause ambiguity for the interpretation of the policy. To be effective, it is necessary to make it clear that scenario 1 refers to 'dwellings' and that each scenario is a separate consideration through the insertion of 'or'. This is rectified by **MM06**.
56. There is no means of monitoring the future performance of either Policy HMO2 or HMO3. Similar to my findings on Policies HMO1 and HMO4, **MM12** will rectify this in the interests of future policy effectiveness.
57. Subject to the recommended MMs, Policies HMO2 and HMO3 are a justified and effective means to manage the distribution of HMOs and they are consistent with national planning policy.

Overall Conclusion and Recommendation

58. The DPD has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
59. The Council has requested that I recommend MMs to make the DPD sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended MMs set out in Appendix 1, the Coventry City Homes in Multiple Occupation Development Plan Document satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

C Dillon

Inspector

This report is accompanied by Appendix 1 containing the Main Modifications.

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Coventry City Council

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

Adoption

March 2025

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1. Executive Summary

What is a HMO?

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

Why now?

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

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

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

This Homes in Multiple Occupation (HMO) Development Plan Document (DPD) forms part of the formal Development Plan for Coventry City Council. It is being produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

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

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

2. Introduction

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

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



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

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

3. Policy Context

National Policy Context

National Planning Policy Framework

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

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

Local Policy Context

Coventry Local Plan

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

Figure 1: Coventry Local Plan, Policy H11

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

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

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

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

3.4 The SHMA assessments have shown that the housing market in Coventry is generally focused towards smaller, lower value properties relative to the wider housing market area and national trends. For example, 71% of all Coventry homes are within Council Tax bands A and B compared to Nuneaton where the figure is 60% and the national average is 44%. Likewise, just 10% of the city's existing housing stock is classified as detached. The Council is expecting this data to be comprehensively updated through the joint 2022 Housing and Economic Development Needs Assessment (HEDNA) later in the year. However, at present, the Council are currently planning for 24,600 additional new homes between 2011 and 2031. Any new residential schemes coming forward during this period that comprise 25 homes or 1 hectare or more will be expected to provide 25% of affordable homes¹

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

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

HMO and the Planning Use Classes Order

3.7 Planning use classes are the legal framework which determines what a particular property may be used for by its lawful occupants. The current Use Classes were last updated on 1 September 2020². Uses are grouped into classes B, C, E, F and Sui Generis (of their own use class).

3.8 The Government defines a HMO³ as:

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

¹ www.coventry.gov.uk/downloads/file/25899/final-local-plan-december-2017

² www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

³ www.gov.uk/house-in-multiple-occupation-licence

3.9 From a planning perspective, the Use Classes Order⁴ distinguishes between 'small' HMOs of up to six people (C4 use class), and 'large' HMOs of seven or more occupants (Sui Generis). Currently, planning permission is not needed to change the use of a house to a HMO with 3-6 residents, which is known as Permitted Development (PD). The Article 4 Direction covering HMOs in Coventry means that, within the designated area, planning permission is required for all HMO proposals (small or large).

3.10 Planning permission is required for a material change of use. Consequently, the local planning authority will make an assessment as to whether any proposed new HMO or intensification in the occupation of an existing HMO would represent such a change from the site's lawful use.

⁴ www.planninggeek.co.uk/use-class/use-class-c/

4. HMOs in Coventry - Issues

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

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

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

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

Key Issues in Coventry

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

Key Issue 1: Concentrations

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



Key Issue 2: Sandwiching (street level)

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

4.7 Potential sandwiching situations can include:

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

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

Key Issue 3: HMO Thresholds (ward level)

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

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

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



5. Policy Approach

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



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

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

5.3 A large HMO is a property accommodating more than six unrelated persons sharing facilities and a small HMO accommodates between three and six unrelated persons. Housing legislation and the Planning Use Classes Order provides for different regulatory frameworks for managing HMOs⁵.

5.4 At the current time, any proposal for a small HMO is classed as permitted development. However, this DPD has been developed in parallel with an Article 4 Direction which has withdrawn those permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, which are covered by the Article 4 Direction, meaning that like large HMO proposals, small HMO proposals (less than 7 unrelated occupants in a single dwelling) in those areas now require planning permission.



⁵ www.hmohub.co.uk/planning-vs-licensing/

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

POLICY HMO1 – HOMES IN MULTIPLE OCCUPATION (HMOs)

All proposals for the conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold will be required to demonstrate that:

- a) there is good accessibility to local amenities and public transport; and
- b) there will be sufficient capacity either off street or on street to meet the parking requirements of the proposed development.

Justification

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

5.7 HMO proposals can relate to the change of use of an existing building, the erection of new purpose-built accommodation or the intensification of occupation of an existing HMO. This policy must be read in conjunction with the adopted Development Plan as a whole so that applicants are familiar and clear as to what will be required to ensure compliance with all relevant policies in any HMO related scenario.

5.8 The level of a HMO proposal's accessibility will be determined primarily through an assessment of the proposal against the adopted Transport Strategy⁶, the Council's Liveable Neighbourhoods approach to accessibility and the Coventry Green Space Strategy. Good

⁶ <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy/print>

access for HMO occupants to public transport is of environmental, social and economic importance. This extends to University of Warwick and Coventry University students given the parking restrictions operating on campus and in parts of the city centre. This policy therefore seeks to ensure that HMO proposals are within a reasonable walking distance of a bus stop. Furthermore, tools including Transport Assessments; Travel Plans; parking standards; parking capacity surveys and Urban Traffic Management and Control will assist in demonstrating and determining whether proposals will maintain the integrity of the local highway network. For further information about these matters, please refer to the Coventry Connected SPD⁷. For further information regarding the HMO Article 4 designation, please visit the Councils webpage⁸.

POLICY HMO2 – CONCENTRATIONS AND THRESHOLDS

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

Justification

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

⁷ https://www.coventry.gov.uk/downloads/download/5195/coventry_connected_supplementary_planning_document_spd

⁸ <https://www.coventry.gov.uk/downloads/file/40973/article-4-direction-hmo-30-9-23>

do not arise and that existing living conditions of residents in the vicinity of the proposed site and along those connecting routes are maintained.

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

POLICY HMO3 – SANDWICHING

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

Sandwiching includes:

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

Justification

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

compromised. The calculations and assessments for sandwiching will take into account any extant permissions.

POLICY HMO4 – AMENITY AND DESIGN

All proposals for the conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold must meet the following criteria:

- a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated;
- b) There would be no demonstrably adverse impact on the amenity of the occupants of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance arising from the proposal;
- c) the proposal does not affect a designated or non-designated heritage asset or its setting in a manner which would represent unjustified harm to its significance;
- d) The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation;
- e) The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation;
- f) The design of external space is safe and secure, and includes provision for washing facilities and adequate vehicular parking where required, and cycle parking⁹, and ensures access to useable outdoor amenity space; and
- g) Sufficient refuse bin storage is provided externally within the curtilage of the property, within a suitably located and designed structure so that the refuse bin is not visible from the public realm;

Furthermore, all proposals will be expected to demonstrate:

- h) how the relevant 'Secured By Design' principles have been met including the preparation of a management plan to demonstrate how the crime prevention measures will be maintained; and¹⁰
- i).how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.

⁹ www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031

¹⁰ www.securedbydesign.com

** 6.51 m² for one person over ten years of age, 10.22 m² for two persons over ten years of age and 4.64 m² for one child under the age of ten years. Any room of less than 4.64m² must not be used as sleeping accommodation.¹¹*

Justification

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

5.13 The policy also aims to ensure that there is satisfactory provision for the storage of waste, since a house occupied as an HMO can usually generate more waste than a family or couple. It is considered that all habitable rooms should have an adequate level of natural lighting provided via a clear glazed window or windows. Where practicable, all staircases, landings, passages, kitchens, bathrooms and toilets should be provided, with a window. Windows to bathrooms and toilets should be glazed with obscured glass. The minimum room size requirements are based on figures set out within the Council's HMO licensing standards¹².

5.14 Finally, Secured by Design (SBD) and Designing Out Crime (DOC) are one of the most sustainable and cost-effective crime reduction interventions. It is therefore sensible and appropriate for applicants to consider such principles when developing their planning application proposals. HMOs often have ground-floor sleeping accommodation which puts those on the ground floor at the highest risk of flooding. Criteria (i) requires the applicant to demonstrate how any identified potential flood risk would be addressed. This may include the incorporation of appropriate site specific mitigation such as raising floor levels, flood resistant construction and the preparation of a Water Exclusion Strategy.

¹¹ Figures based on Coventry City Council's HMO licensing standards: www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards

¹² <https://www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards>

6. Assessment Process

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

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

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

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

Further information on submitting a planning application is available on the Council's website¹³.

Calculations

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

¹³ www.coventry.gov.uk/planning-2/planning-application-checklist-supporting-information

Stage 1: Identifying residential properties

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

Stage 2: Count HMOs

HMOs are identified from the following sources:

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

Stage 3: Calculate concentration

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

Planning permission would not be granted where the introduction of a new HMO would result in an existing C3 dwelling being 'sandwiched' by any adjoining HMOs or non-family residential uses on both sides. Planning permission would not be granted where it would result in a continuous frontage of 3 or more HMOs or non-family residential uses. In situations where properties are not traditional houses situated along a street frontage, the policy can be applied flexibly depending on the individual circumstances of the proposal. In calculating the 10% concentration level, this will be determined for extant permissions based on data derived from Coventry's Council tax data and other appropriate data sources during the planning application determination period.

7. Monitoring

7.1 This section identifies a range of monitoring requirements linked to the policies of this Plan. These requirements will be assessed and articulated through the Council's Annual Monitoring Report process to test the delivery and performance of the HMO DPD policies. Monitoring will use the existing mapping baseline data set out in the evidence base document that supports the HMO DPD.

Policy	Indicator
HMO1	The number of (%) of applications granted planning permission in compliance with policy HMO1 and reasons for refusal.
HMO2	The number (%) of applications that are refused including reasons for refusal based on exceeding the 10% threshold and those applications permitted contrary to exceeding the 10% concentration threshold.
HMO3	The number (%) of applications that are refused including reasons for refusal based on not meeting the sandwiching criteria and those applications permitted contrary to not meeting the sandwiching criteria.
HMO4	The number (%) of applications that are refused which do not meet the amenity and design criteria.

Appendix 2: Glossary of Terms

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

e-mail: planningpolicy@coventry.gov.uk

APPENDIX 3:

COVENTRY CITY HOMES IN MULTIPLE OCCUPATION DEVELOPMENT PLAN DOCUMENT

SCHEDULE OF MAIN MODIFICATIONS

The main modifications overleaf are shown in the same order as the examined Plan. Changes to text are expressed either in the conventional form of ~~strike through~~ for deletions and **bold underlining** for additions of text.

The page numbers and paragraph numbering below refer to the Submission Coventry City Homes in Multiple Occupation Development Plan Document and may not be the same as the final adopted document.

Main Modification Reference	DPD Reference	Main Modification
MM01	Para 3.10 (Page 9)	<p>HMOs therefore currently require planning permission once they exceed six unrelated people if that change results in a material change in use. Large HMOs, formed from seven unrelated residents or more and no PD right exists to change a HMO with 7 or more residents from any use. Consequently, for the change of use of any premises to a HMO for seven or more residents, an assessment must be made as to whether a material change of use from the prior lawful use has occurred and, if it is determined that it has, then planning permission is required.</p> <p><u>Planning permission is required for a material change of use. Consequently, the local planning authority will make an assessment as to whether any proposed new HMO or intensification in the occupation of an existing HMO would represent such a change from the site's lawful use.</u></p>
MM02	Policy HMO1 (Page 16)	<p>All proposals for the <u>conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold</u> provision of HMOs will be required to demonstrate that:</p> <p>a) there is good accessibility to local amenities and public transport;</p> <p>b) they accord with the emerging Accessible Homes standards¹ (or any future national equivalent) and provide satisfactory living conditions for the intended occupiers; and</p> <p>cb) there will be <u>sufficient capacity either off street or on street to meet the parking requirements of the proposed development</u>. no demonstrably adverse impact on the amenity of neighbouring properties or the character of the area by way of character, appearance,</p>

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/930274/200813_con_doc_final_1.pdf

Main Modification Reference	DPD Reference	Main Modification
		<p>highway safety, parking and historic assets and their setting. The proposal must also meet the criteria in policy HMO4.</p>
MM03	<p>Justification Para 5.7 (Pages 16-17)</p>	<p>It should be noted that the Council intends to introduce an Article 4 Direction requiring planning permission for a change of use from family dwellings (C3) to small HMOs for between 3 and 6 unrelated people (C4 dwellings) within specified wards of the city. At the current time, eleven wards have been proposed to be included as part of the Article 4 Direction area, albeit they should not be considered as being the only places in the city that have a concentration of HMO dwellings. These proposed wards are:</p> <ul style="list-style-type: none"> • Cheylesmore • Earlsdon • Foleshill • Lower Stoke • Radford • St. Michaels • Sherbourne • Wainbody, • Whoberley • Westwood • Upper Stoke <p>Please note: the Article 4 Direction was subject to a separate consultation process and is not being consulted on through this document.</p> <p><u>5.7 HMO proposals can relate to the change of use of an existing building, the erection of new purpose-built accommodation or the intensification of occupation of an existing HMO. This policy must be read in conjunction with the adopted development plan as a whole so that applicants are familiar and clear as to what will be required to ensure compliance with all relevant policies in any HMO related scenario'.</u></p> <p><u>5.8 The level of a HMO proposal's accessibility will be determined primarily through an assessment of the proposal against the adopted Transport</u></p>

Main Modification Reference	DPD Reference	Main Modification
		<p><u>Strategy², the Council's Liveable Neighbourhoods approach to accessibility and the Coventry Green Space Strategy. Good access for HMO occupants to public transport is of environmental, social and economic importance. This extends to University of Warwick and Coventry University students given the parking restrictions operating on campus and in parts of the city centre. This policy therefore seeks to ensure that HMO proposals are within a reasonable walking distance of a bus stop. Furthermore, tools including Transport Assessments; Travel Plans; parking standards; parking capacity surveys and Urban Traffic Management and Control will assist in demonstrating and determining whether proposals will maintain the integrity of the local highway network. For further information about these matters, please refer to the Coventry Connected SPD³. For further information regarding the HMO Article 4 designation, please visit the Councils webpage⁴.</u></p>
MM04	Policy HMO2 (Page 18)	<p>Where there is an existing HMO concentration of 10% or more of all dwellings within 100 metres radius of the centre point of the application property, HMO applications will not be supported permitted. Where there is an existing HMO concentration of less than 10% within 100 metres radius of the centre point of the application property, HMO applications will be considered against the other Policies in this DPD and all other relevant development plan policies.</p>
MM05	Justification Para 5.9 (Page 18)	<p>5.9 It is not the aim of the policy to reduce overall HMO numbers or to stop further HMO proposals coming forward, but to ensure that potentially harmful concentrations do not arise and that a high standard of accommodation and amenity is created, given the important role HMOs play as part of the city's housing offer. Clearly, patterns of supply and demand will change over time but there is a link between student</p>

² <https://www.coventry.gov.uk/transport-strategy-2/transport-strategy/print>

³ https://www.coventry.gov.uk/downloads/download/5195/coventry_connected_supplementary_planning_document_spd

⁴ <https://www.coventry.gov.uk/downloads/file/40973/article-4-direction-hmo-30-9-23>

Main Modification Reference	DPD Reference	Main Modification
		<p>shared-houses and the increasing provision of purpose-built student accommodation located in the city centre. Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the concentration. Consequently, boundaries may change, and new areas may be identified. Such areas would be subject to the preferred option this policy. The evidence shows that high concentrations of HMOs in the city are already having an adverse impact on the character and amenity of local areas and this issue is spreading to further areas. The NPPF encourages local planning authorities to help maintain mixed and balanced communities. Overconcentration of HMOs can cause imbalance, leading to the problems identified in section 4. <u>This includes increased levels of anti-social behaviour and noise within their immediate vicinity and on routes linking them with the city centre. This policy seeks to ensure that potentially harmful concentrations do not arise and that existing living conditions of residents in the vicinity of the proposed site and along those connecting routes are maintained.</u></p>
MM06	Policy HMO3 (Page 19)	<p>Proposals for the provision of HMOs must not result in a non-HMO dwelling being sandwiched between two HMOs and must not lead to a continuous frontage of three or more HMOs. Sandwiching includes:</p> <ol style="list-style-type: none"> 1. Up to three single residential properties <u>dwellings</u> in a street located between two single HMO properties; 2. Single HMO properties in any two of the following locations: adjacent, opposite and <u>or</u> to the rear of a single residential property; 3. A residential flat within a sub-divided building where the majority of flats are HMOs. 4. A residential flat within a sub-divided building in a street located between two other subdivided buildings with at least one HMO flat in each building; 5. A residential flat within a sub-divided building located between two HMO flats above and below; and <u>or</u> 6. A residential flat within a sub-divided building located between two HMO flats on both sides.

Main Modification Reference	DPD Reference	Main Modification
MM07	Justification Para 5.12 (Page 19)	5.12- 11 11 Preventing the “sandwiching” of a non-HMO between two HMOs or a continuous frontage of three or more HMOs is an approach that aims to prevent unacceptable adverse impacts on amenity (as set out in paragraph 4.1) and to control the location of new HMOs and student accommodation in order to prevent these uses from either exacerbating existing or creating new concentrations. It is not the intention of the policy to restrict further growth in HMOs. The Council recognises the importance of HMOs and the private rented sector generally in the housing stock but seeks to ensure that the amenity of neighbouring residents is not compromised. <u>The calculations and assessments for sandwiching will take into account any extant permissions.</u>
MM08	Policy HMO4 (Page 19-20)	All proposals for the <u>conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold</u> provision of HMOs will be assessed against <u>must meet</u> the following criteria: a) The premises are suitable for a full or part conversion in terms of location and size for the number of households to be accommodated; b) There would be no demonstrably adverse impact on the amenity <u>of the occupants</u> of neighbouring properties and the character of the surrounding area in particular through increased activity, noise or disturbance <u>arising from the proposal;</u> <u>c) and the proposal does not affect a designated or non-designated historic heritage asset assets or its setting in a manner which would represent unjustified harm to its significance;</u> and their setting; ↪ <u>d)</u> The configuration of internal sleeping accommodation space satisfactorily takes into account minimum room size requirements* and light and ventilation; ↪ <u>e)</u> The use of acoustic insulation to protect neighbouring and adjacent properties through appropriate party wall insulation; ↪ <u>f)</u> The design of external space is safe and secure, and includes provision for refuse storage , washing

Main Modification Reference	DPD Reference	Main Modification
		<p>facilities and adequate vehicular <u>parking where required</u>, and cycle parking⁵, and ensures access to <u>useable</u> outdoor amenity space; and</p> <p>f) g) Sufficient refuse bin storage is provided externally within the curtilage of the property, within a suitably <u>located and</u> designed structure <u>so that</u> and the refuse bin <u>is</u> not visible from the public realm; and</p> <p>Furthermore, g) <u>All</u> proposals will be expected to demonstrate:</p> <p>h) how the relevant 'Secured By Design' standards <u>principles</u> have been met <u>including the preparation of a management plan to demonstrate how the crime prevention measures will be maintained.</u>⁶; and</p> <p>i) how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured.</p> <p><i>* 6.51 m² for one person over ten years of age, 10.22 m² for two persons over ten years of age and 4.64 m² for one child under the age of ten years. Any room of less than 4.64m² must not be used as sleeping accommodation.</i>⁷</p>
MM09	Justification Para 5.15 (Pages 20-21)	<p>5.15 <u>13</u> The policy also aims to ensure that there is satisfactory provision for the storage of waste, since a house occupied as an HMO can usually generate more waste than a family or couple. It is considered that all habitable rooms should have an adequate level of natural lighting provided via a clear glazed window or windows. Where practicable, all staircases, landings, passages, kitchens, bathrooms and toilets should be provided, with a window. Windows to bathrooms and toilets should be glazed with obscured glass. <u>The minimum room size requirements are based on figures set out within the Councils HMO licensing standards</u>⁸.</p>

⁵ www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031

⁶ www.securedbydesign.com

⁷ Figures based on Coventry City Council's HMO licensing standards: www.coventry.gov.uk/downloads/file/27566/room-size-and-amenity-provision-standards

⁸ <https://www.coventry.gov.uk/downloads/file/27566/room-sizeand-amenity-provision-standards>

Main Modification Reference	DPD Reference	Main Modification
MM10	Justification Para 5.16 (Page 21)	<p><u>5.46 14</u> Finally, Secured by Design (SBD) and Designing Out Crime (DOC) are one of the most sustainable and cost-effective crime reduction interventions. Its is therefore sensible and appropriate for applicants to consider such standards principles when developing their planning application proposals. <u>HMOs often have ground-floor sleeping accommodation which puts those on the ground floor at the highest risk of flooding. Criteria (i) requires the applicant to demonstrate how any identified potential flood risk would be addressed. This may include the incorporation of appropriate site specific mitigation such as raising floor levels, flood resistant construction and the preparation of a Water Exclusion Strategy.</u></p>
MM11	Section 6, Stage 3 calculate concentration (Page 23)	<p>Planning permission would not be granted where the introduction of a new HMO would result in an existing C3 dwelling being 'sandwiched' by any adjoining HMOs or non-family residential uses on both sides. Planning permission would not be granted where it would result in a continuous frontage of 3 or more HMOs or non-family residential uses. In situations where properties are not traditional houses situated along a street frontage, the policy can be applied flexibly depending on the individual circumstances of the proposal. <u>In calculating the 10% concentration level, this will be determined for extant permissions based on data derived from Coventry's Council tax data and other appropriate data sources during the planning application determination period.</u></p>
MM12	Insert a new section, explanatory text and monitoring indicators after Section 6 of the DPD	<p><u>7. Monitoring</u></p> <p><u>7.1 This section identifies a range of monitoring requirements linked to the policies of this Plan. These requirements will be assessed and articulated through the Council's Annual Monitoring Report process to test the delivery and performance of the HMO DPD policies. Monitoring will use the existing mapping baseline data set out in the evidence base document that supports the HMO DPD.</u></p>

Main Modification Reference	DPD Reference	Main Modification
		<p>Insert a new table containing the following indicators:</p> <p><u>HMO1: The number of (%) of applications granted planning permission in compliance with policy HMO1 and reasons for refusal.</u></p> <p><u>HMO2: The number (%) of applications that are refused including reasons for refusal based on exceeding the 10% threshold and those applications permitted contrary to exceeding the 10% concentration threshold.</u></p> <p><u>HMO3: The number (%) of applications that are refused including reasons for refusal based on not meeting the sandwiching criteria and those applications permitted contrary to not meeting the sandwiching criteria.</u></p> <p><u>HMO4: The number (%) of applications that are refused which do not meet the amenity and design criteria.</u></p>

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Homes in Multiple Occupation (HMO) Development Plan Document (DPD)
Schedule of Final Additional Modifications (February 2024) to the Published Submission Version (August 2023)

The following format has been used to denote the modifications:

Underlined bold text = new text proposed for policy compared to the submission version.

~~Strikethrough text~~ = text proposed for removal compared to the submission version.

Underlined text = new text proposed for justification text compared to the submission version.

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

Schedule of Final Additional Modifications (February 2024) to the Published Submission Version (August 2023)



Additional Modification Number	Plan Reference	Proposed Main Modification	Reason for Modification
ADM 01	Page 4 Final paragraph	The submission version DPD is the document that will be submitted to the Planning Inspectorate for examination. It is the version the Council will seek to adopt, subject to that examination, as the future framework for decision making.	The inclusion of this paragraph is superfluous.
ADM 02	Page 9 Para 3.9	From a planning perspective, the Use Classes Order ¹ distinguishes between ‘small’ HMOs of up to six people (C4 use class), and ‘large’ HMOs of seven or more occupants (Sui Generis). Currently, planning permission is not needed to change the use of a house to a HMO with 3-6 residents, which is known as Permitted Development (PD). The effect of any prospective Article 4 Direction covering HMOs in Coventry will be means that, within any the designated area, planning permission would be is required for all HMO proposals (small or large).	Minor textual change to reflect the current position.
ADM 03	Page 15 Para 5.4	At the current time, any proposal for a small HMO is classed as permitted development. However, this DPD has been developed in parallel with a proposed an Article 4 Direction which will seek to has withdrawn those permitted development rights for small HMOs. There are significant existing concentrations of HMOs in certain wards across the city, which are covered by where an the Article 4 Direction meaning that like large HMO proposals, will be developed (expected to be in place by 2023) removing permitted development rights for small HMO proposals (less than 6 7 unrelated occupants in a single dwelling) in those areas now require planning permission.	To correct a factual inaccuracy and provide a necessary update.
ADM 04	Page 16 Para 5.6	Whilst there is an existing and corporately agreed approach to managing HMOs through the licencing regime, there is a need to strengthen existing planning policy to address HMO concentration coupled with a proposed non immediate the introduction of the Article 4 Direction to withdraw permitted development rights within specific wards of the city (expected to be in place in 2023) . The evidence has established that small HMO dwellings are associated with neighbourhoods where the predominant dwelling type is small (three	Minor textual change to reflect the current position.

¹ www.planninggeek.co.uk/use-class/use-class-c/

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)
 Schedule of Final Additional Modifications (February 2024) to the Published Submission Version (August 2023)



Additional Modification Number	Plan Reference	Proposed Main Modification	Reason for Modification
		<p>bedroom) terraced dwellings, privately rented, and whilst mostly occupied by students, provide accommodation for a range of people. The cumulative effect of incremental intensification in an area caused by numerous changes of use from small HMO to large HMOs or the extension of existing HMOs can be also significant. For these reasons, applications for such changes will be assessed using the criteria in policies HMO1 and HMO4.</p>	
ADM 05	Page 17 Para 5.9	<p>It is not the aim of the policy to reduce overall HMO numbers or to stop further HMO proposals coming forward, but to ensure that potentially harmful concentrations do not arise and that a high standard of accommodation and amenity is created, given the important role HMOs play as part of the city’s housing offer. Clearly, patterns of supply and demand will change over time but there is a link between student shared-houses and the increasing provision of purpose-built student accommodation located in the city centre. Restricting HMO supply in one neighbourhood, may prompt landlords to examine adjoining areas, displacing the concentration. Consequently, boundaries may change, and new areas may be identified. Such areas would be subject to <u>this</u> the preferred option policy.</p>	<p>Minor textual change to reflect the current position.</p>
ADM 06	Page 18 Para 5.10	<p>The proposed eleven wards to be included within the Article 4 Direction area have varying levels of existing HMO dwelling concentrations. However, the preferred option would <u>policy applies</u> to the city as a whole rather than at individual street level. A single threshold has been set at 10% which is considered to be a modest level based on the size and scale of the challenge this DPD is aiming to address. Moreover, research based on similar size cities across the country which have already implemented a policy intervention to address HMO challenges, also suggests that the threshold would be appropriate and reasonable. For neighbourhoods which exceed the threshold, no further applications to a C4 HMO dwelling, generated by the withdrawal of change of use permitted development rights would be permitted.</p>	<p>Minor textual change to reflect the current position.</p>

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

Schedule of Final Additional Modifications (February 2024) to the Published Submission Version (August 2023)

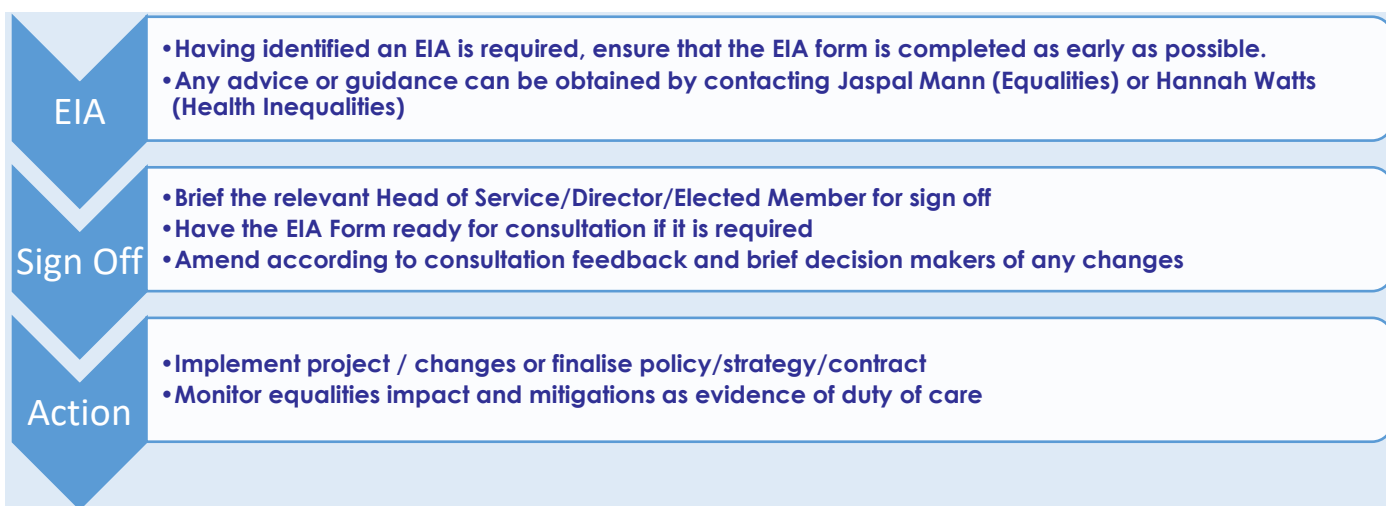


Additional Modification Number	Plan Reference	Proposed Main Modification	Reason for Modification
ADM 07	Page 22 Section 6, stage 2	Delete the words 'expected to be' and 'proposed' from the third bullet point.	To reflect the most up-to-date position.

EQUALITY IMPACT ASSESSMENT (EIA)



Title of EIA		Homes in Multiple Occupation (HMO) DPD Consultation on Main Modifications
EIA Author	Name	Rob Haigh
	Position	Senior Planning Policy Officer
	Date of completion	13 March 2024
Head of Service	Name	Rob Back
	Position	Strategic Lead Planning
Cabinet Member	Name	Councillor David Welsh
	Portfolio	Housing and Communities



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

SECTION 1 – Context & Background

1.1 Please tick one of the following options:

This EIA is being carried out on:

- New policy / strategy
- New service
- Review of policy / strategy
- Review of service
- Commissioning



Other project (please give details) *Development Plan Document for Homes in Multiple Occupation (HMO).*

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

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

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

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

Applicants who are required to submit planning applications for HMO schemes, agents and individuals who may want to let private housing and those members of the community who need to access HMOs. The Government defines a HMO¹ as:

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

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

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

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

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

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

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

Coventry City Council Planning Policy Service.

¹ www.gov.uk/private-renting/houses-in-multiple-occupation



SECTION 2 – Consideration of Impact

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

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

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

2.1 Baseline data and information

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

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

This DPD sets out the policy position in managing and guiding decision makers in determining HMO planning applications across the city.

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

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

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

Protected Characteristic	Impact type	Nature of impact and any mitigations required
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EQUALITY IMPACT ASSESSMENT (EIA)



	P, N, PN, NI or ID	
Age 0-18	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. The DPD has the potential for improvement of the quality of HMOs. HMOs have the potential to benefit the wider local community by reducing social and environmental factors associated with high concentrations of HMOs relating to noise, rubbish and general upkeep.
Age 65+	P	See above in terms of disposable household income and average house prices. Some HMO products (as defined by the Government in the National Planning Policy Framework) will be applicable depending upon the individual / household circumstances
Disability	ID	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Gender reassignment	ID	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Marriage and Civil Partnership	ID	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Pregnancy and maternity	ID	No direct impact although some HMO products will be applicable depending upon the individual / household circumstances
Race (Including: colour, nationality,	ID	No direct impact although Coventry has a diverse population and affordable products 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>

EQUALITY IMPACT ASSESSMENT (EIA)



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

HEALTH INEQUALITIES

2.3	<p>Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live, work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at https://coventrycc.sharepoint.com/Info/Pages/What-is-an-Equality-Impact-Assessment-(EIA).aspx</p>	
Question	Issues to consider	
2.3a What HIs exist in relation to	<ul style="list-style-type: none"> Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) 	

EQUALITY IMPACT ASSESSMENT (EIA)



<p>your work / plan / strategy</p>	<ul style="list-style-type: none"> ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<p>Response:</p> <p>The HMO DPD supplements and provides complementary policies to Policy H11 of the adopted Local Plan which was subject to a Health Impact Assessment. The Health and Wellbeing chapter of the plan, which includes Policy HW1, requires Health Impact Assessments for particular types and scale of development where there could be significant impacts. See www.coventry.gov.uk/localplan This was supplemented by a Health Impact Assessment SPD which provided further detail and guidance including that in relation to HMOs. See www.coventry.gov.uk/downloads/file/28900/health_impact_assessment_spd</p>
<p>2.3b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be
	<p>Response:</p> <p style="padding-left: 40px;">a. Potential outcomes including impact based on socio-economic status or geographical deprivation</p> <p>The Health Impact Assessment SPD referred to above includes the following:</p>

EQUALITY IMPACT ASSESSMENT (EIA)



Category 1: Housing Quality and Design

Access to decent and adequate housing is critically important for health and wellbeing, especially for the very young and very old. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has an impact on community welfare, cohesion and mental wellbeing.

Considerations	Negative effects	Positive Effects	Relevant Local Plan Policies and Supplementary Planning Documents
<ul style="list-style-type: none"> • Accessible and adaptable dwellings • Internal space standards, orientation and layout • Affordable housing and dwelling mix • Energy efficiency • High Quality Design 	A lack of affordable housing within communities may compromise the health of low-income residents as they are likely to spend more on housing costs and less on other daily living needs.	Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency, and detailed design considerations to make sure that homes are accessible, adaptable and well oriented.	<ul style="list-style-type: none"> • AC2: Road Network • DE1: Ensuring High Quality Design • DS3: Sustainable Development Policy • EM2: Building Standards • EM5: Sustainable Drainage Systems SuDS • H3: Provision of New Housing • H4: Securing a Mix of Housing • H5: Managing Existing Housing Stock • H6: Affordable Housing • H8: Care Homes, Supported Housing, Nursing Homes and Older Persons accommodation • Coventry Connected (Transport) SPD • Delivering a more Sustainable City SPD
	Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health.	Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community.	
	The quality of design, including internal sound insulation, daylighting and provision of private space can influence the health and wellbeing of occupiers.	Providing adaptable homes allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing allows care to be	
		provided in the community more easily.	<ul style="list-style-type: none"> • Sustainable Urban Extension Design Guide SPD

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

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

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

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

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

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

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

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

This was considered through the Local Plan and this document provides the detail to ensure the Local Plan policies can be delivered effectively.

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



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

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

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

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

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

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

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

No.

EQUALITY IMPACT ASSESSMENT (EIA)



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

Headcount:

Sex:

Female	
Male	

Age:

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

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

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

Religion:

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

Sexual Orientation:

Heterosexual	
LGBT+	
Prefer not to state	
Unknown	

3.0 Completion Statement

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

No impact has been identified for one or more protected groups

Positive impact has been identified for one or more protected groups

EQUALITY IMPACT ASSESSMENT (EIA)



Negative impact has been identified for one or more protected groups

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

4.0 Approval

Signed: Head of Service: Rob Back	Date: 28.03.2024
Name of Director: Andrew Walster	Date sent to Director: 28.03.2024
Name of Lead Elected Member: Councillor D Welsh	Date sent to Councillor:

Email completed EIA to equality@coventry.gov.uk

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**Coventry Local Plan 2011-2041
Homes in Multiple Occupation (HMO)
Development Plan Document (DPD)**

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

SA Adoption Statement

December 2024



Coventry Local Plan 2011-2041: Homes in Multiple Occupation (HMOs) DPD

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

SA ADOPTION STATEMENT December 2024

date:	December 2024	
prepared for:	Coventry City Council	
prepared by:	Barbara Carroll	Enfusion
quality assurance:	Barbara Carroll	Enfusion

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This SA Adoption Statement

1. Sustainability Appraisal (SA) is a systematic process that must be carried out by a local authority during the preparation of Local Plan documents relating to development – as set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF¹ updated 2023).
2. SA incorporates the requirements for Strategic Environmental Assessment (SEA) that seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The EU Directive was implemented in the UK through the SEA Regulations (2004)² which remain in place since the UK left the EU.
3. The City Council is also required to undertake a Habitats Regulations Assessment (HRA) of the DPD. The HRA process has its own legislative drivers and requirements. Whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel to the SA and its findings have informed the SA.
4. The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government planning guidance³. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:
 - (a) *how environmental considerations have been integrated into the plan or programme;*
 - (b) *how the environmental report has been taken into account;*
 - (c) *how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;*
 - (d) *how the results of any consultations entered into under regulation 14(4) have been taken into account;*
 - (e) *the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and*
 - (f) *the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.*
5. SA should demonstrate how the plan has addressed relevant economic, social, and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and,

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

The Development of the Coventry Homes in Multiple Occupation (HMO) Development Plan Document (to 2041)

6. The overarching development plan document for the Coventry City Council area is the Local Plan (2011 – 2041) that was adopted in December 2017⁴. As set out in its Climate Change Strategy⁵, Coventry City Council is committed to playing its part in the drive to zero carbon while making sure the most vulnerable and at risk from climate change are engaged and supported, and that the opportunities for the green industrial revolution with all the jobs and economic benefits it brings are maximised.
7. In accordance with the Council's adopted Statement of Community Involvement (2012 & updated July 2021)⁶, at each stage of the development of the DPD, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised, and responses prepared, have been documented during the development of the DPD and published on the Council's website⁷.
8. The draft Coventry Net Zero Carbon DPD was submitted to the Secretary of State on 25 August 2023 for independent examination by a Planning Inspector. The examination hearing were held on 23 January 2024⁸. The Inspector advised that certain main modifications (MMs) to the submission DPD would be required to be made for reasons of soundness before the DPD could be adopted. Following additional work, the proposed MMs to the Coventry HMO DPD were published for public consultation between 10 June and 22 July 2024.
9. The Inspector in her final report (4 November 2024) concluded that with the recommended main modifications, the Coventry City Homes in Multiple Occupation Development Plan Document satisfies the requirements of Section 20(5)(a) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

⁴ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031>

⁵ <https://www.coventry.gov.uk/climatechange/pathway>

⁶ <https://www.coventry.gov.uk/planning-policy/coventry-local-plan-2011-2031/8>

⁷ <https://www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document>

⁸ HMO Examination documents available at: <https://www.hwa.uk.com/projects/coventry-city-council-hmo-dpd/>

How environmental & sustainability considerations have been integrated into the DPD; How the Sustainability/Environmental Report has been taken into account

10. During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing DPD. The SA was undertaken in accordance with government guidance⁹ which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2022, independent specialist consultants were appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the DPD.
11. The SA built upon the previous SA work undertaken during the development of the Local Plan – for consistency and correlation. The SA method was refined to be focused on the Homes in Multiple Occupation DPD with relevant sustainability topics and issues. The updated SA scoping identified that some SA Objectives were not relevant for testing the HMO DPD and these were scoped out of the assessment. The opportunity was taken to update the assessments in line with the revised NPPF and the updated requirements for HRA. The scope of the SA was subject to formal and public consultation between 20 September and 15 November 2022.
12. The refined SA Framework was used as the basis for assessing the emerging DPD - and as explained in Section 2 of the submitted SA Report (December 2022). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a framework of SA Objectives and sub-objectives that are relevant to the DPD and the Coventry City Council area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
13. The SA considered the likely significant effects of the implementation of the DPD on the sustainability objectives for the Coventry City Council area. For each aspect of the DPD, the assessment against the SA Objectives was recorded with a narrative describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium, and long term, permanent, and temporary, positive, and negative, secondary, cumulative, and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported. The SA was informed by best available information to assess the effects of the policies and of the HMO DPD as a whole.

⁹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

14. The SA found that there were several SA objectives for which the HMO policies had only a negligible or neutral effect. There were no significant negative effects found. The HMO DPD as a whole was found to have positive effects for SA objectives on inclusive communities, health and wellbeing, housing, reducing crime, and for meeting local needs locally. Major positive effects were identified for housing as the DPD is responding to an identified need in this particular type of housing and seeking to manage the need more proactively so that likely negative effects can be mitigate.
15. The Council has recognised that sustainability problems have developed in certain areas of Coventry and associated with intensification of HMOs. Such negative effects have been reported on amenity and character, including nuisance noise, overcrowding and highway safety concerns with parking, and odour/health concerns with poor waste management. These likely negative effects have been mitigated through clear policy requirements such that there are no residual negative effects.
16. The SEA Regulations require consideration of reasonable alternatives. The SA tested options for thresholds and concentrations of HMOs at 5% and 10% and 100m an 750m. This is explained and detailed findings presented in section 4 of the submitted SA Report (December 2022). The SA found that there were several SA objectives for which the HMO policies had only a negligible or neutral effect. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. The proactive approach to managing housing is likely to have positive effects for all options with regard to communities, health and housing. Retaining the distance to 100m, mitigation is more certain with regard to townscape/landscape and the historic environment.
17. The SA found minor positive effects as the potential for negative effects on nuisance odour or air quality associated with road traffic and waste management has been reduced through limiting HMOs in areas where there are existing sustainability issues. By reducing the concentration of HMOs to 5%, likely adverse effects are anticipated at a lower threshold such that negative effects are more likely to be avoided. By extending the distance out of 750m, the risk of adverse effects on nuisance odour and air quality are increased, less mitigated – and there is uncertainty of any positive effects. Retaining the distance to 100m, mitigation is more certain with resolution of the existing sustainability problems and confirming likely positive effects.
18. The Council does have the option of not preparing an HMO DPD and continuing with reliance on the existing Coventry Local Plan Policy H11. This do-nothing option was not considered to be a reasonable option since issues that have arisen (associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice) are likely to exacerbate if some action is not taken.

19. Thus, relevant alternatives have been tested through the SA process in an iterative way to inform plan-making. The SA reported outline reasons for progressing or rejecting options and in accordance with the requirements of the SEA Regulations. The findings and recommendations of the SA informed plan-making and were integrated into the development of the DPD.
20. The updated Habitats Regulations Assessment (HRA) screening (April 2022) found that the HMO DPD is considered unlikely to have significant effects on any European sites, alone or in-combination with other plans and projects. These findings were incorporated into the SA.
21. Following submissions to the examination and discussions at the hearing, proposed Main Modifications (MMs) to the HMO DPD were prepared and subject to SA. Most amendments are for updating and to provide further clarity and as such are not significant for SA and HRA. These matters were explained and assessed in the SA & HRA Addendum Note (March 2024) accompanying the proposed Main Modifications to the DPD. The MMs were screened and none were identified as potentially significant for SA/SEA nor HRA, and therefore, no further work was necessary. Thus, the previous findings of the SA/SEA remain relevant and valid. It was confirmed that there will be no significant negative effects and that positive effects have been optimised.

How the results of consultation have been taken into account

22. Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the DPD preparation and the SA as follows:

Coventry HMO DPD Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence Gathering & Technical Studies 2022	
Issues & Preferred Option (July 2022) Regulation 18 Consultation: 20 September 2022 to 15 November 2022	SA/SEA Scoping Report & HRA Screening Report (April 2022) Consultation: 20 September – 15 November 2022) Final SA/SEA Scoping Report (December 2022)
Pre-Submission HMO Development Plan Document Regulation 19 Consultation: 27 March – 15 May 2023	Pre-Submission SA Report (December 2022) Consultation: 27 March – 15 May 2023
Submission 25 August 2023 Examination 23 January 2024	Submission 25 August 2023 Examination 23 January 2024
Main Modifications 10 June – 22 July 2024	SA Addendum Note (March 2024) 10 June – 22 July 2024
Local Plan DPD Adoption Q1 2025 (Jan-March)	SA Adoption Statement Q1 2025 (Jan-March)

23. SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and any responses made to issues and concerns raised have been published, including at key statutory stages – SA Scoping and Regulation 19 (Appendix III of submitted SA Report).

Reasons for choosing the DPD as adopted, in the light of other reasonable alternatives

24. The SEA Regulations require assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The UK Government’s planning practice guidance¹⁰ states that “reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable”.
25. The reason for progressing the HMO DPD rather than the Do-Nothing option is to take a proactive approach and seek to resolve the sustainability problems that have already arisen - associated with visual amenity, traffic and parking, waste, noise and disturbance, anti-social behaviour, weakening of community ties, pressures on services, and reduced housing affordability and choice. Also, to ensure that such issues do not get exacerbated.
26. For the options with regard to concentrations (5% & 10%) and thresholds (100m & 750m) that were tested, the Council considers that a single threshold of 10% is modest in regard to the issue to be addressed. Reducing the concentration threshold to 5% existing HMOs would reduce further negative effects on amenity topics but might risk restricting the number of HMOs supported and progressed with issues for meeting the need for this kind of housing. Extending the radius distance to 750m could risk continued accumulation of HMOs and possible negative effects for amenity and community factors.
27. Therefore, the Council continues to consider that the proposed threshold and concentration of 10% and 100m is suitable and deliverable; it does not restrict the progress of HMO delivery and it provides mitigation to reduce the cumulative negative effects for amenity and communities. Each HMO application will be considered on a case by case approach, and this will include the consideration of the characteristics of different areas of the city, for example, dispersed single large dwellings compared with more dense terraced housing.

¹⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Measures that are to be taken to monitor the significant sustainability/environmental effects of the implementation of the DPD

28. The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports on the progress of Local Plans. Government Guidance on SA/SEA advises a pragmatic approach with shared monitoring for the SA/SEA and the Plan.
29. The Coventry HMO DPD includes monitoring of the policies to be included in the Authority Monitoring Report (AMR)¹¹ produced annually. It is considered that the indicators in the AMR relate to the SA indicators and they will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA. Therefore, no additional proposed monitoring that might be required as part of the SEA process was indicated from the findings of the SA.

¹¹ <https://www.coventry.gov.uk/downloads/download/2678/authority-monitoring-reports>

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**Coventry Local Plan 2011-2031:
Homes in Multiple Occupation (HMO)
Development Plan Document (DPD)
Proposed Main Modifications (MMs)**

**Sustainability Appraisal (SA)
incorporating
Strategic Environmental Assessment (SEA)
& Habitats Regulations Assessment (HRA)**

**Addendum Note
March 2024**

Coventry Local Plan 2011-2031: Homes in Multiple Occupation DPD Proposed Main Modifications (MMs)

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) & Habitats Regulations Assessment (HRA)

Addendum Note March 2024

<i>date:</i>	March 2024	
<i>prepared for:</i>	Coventry City Council	
<i>prepared by:</i>	Barbara Carroll	Enfusion
<i>quality assurance:</i>	Barbara Carroll	Enfusion

Contents:

- 1 Introduction
- 2 Screening the Proposed MMs for SA & HRA Significance
- 3 Summary & Next Steps

1.0 INTRODUCTION

The Coventry Homes in Multiple Occupation (HMO) Development Plan Document (DPD): Submission & Examination

- 1.1 The draft Coventry Homes in Multiple Occupation (HMO) DPD¹ was submitted to the Secretary of State on 25 August 2023 for independent examination by a Planning Inspector. The examination hearings were held on 23 January 2024². The Inspector raised certain Matters, Issues & Questions [November 2023, ID2] prior to the hearing sessions and these included queries regarding the SA/SEA and HRA for Matter 1 Legal & Procedural Requirements. The Council prepared a written statement [December 2023, CCC2] that responded to queries relating to these assessments. The SA and HRA were discussed during the first session on the morning of 23 January 2024. There were no representations received on the SA/SEA and HRA, including from the statutory consultation bodies (Environment Agency, Historic England, Natural England).
- 1.2 During post-hearing discussions, the Inspector advised that certain main modifications (MMs) to the submission DPD would be required to be made for reasons of soundness. She did not raise any concerns regarding the SA/SEA and HRA. It is necessary that the Council should consider whether any updates to the SA and/or HRA were required as a result of the proposed modifications identified. If so, they would need to be included in the consultation on the Proposed Modifications.

Purpose & Method for the SA & HRA Addendum Note

- 1.3 This SA Addendum Note constitutes part of the SA/SEA report (December, 2022) submitted on 25 August 2023 for the purposes of compliance with SA and SEA requirements. This Addendum Note only addresses the implications for the assessments with regard to the proposed MMs; it does not reconsider any other aspects of the DPD. Thus, the purpose of the SA Addendum is to consider whether any of the proposed MMs are likely to have significant effects, and to demonstrate that the requirements for SA, SEA and HRA have been met.
- 1.4 Government planning guidance³ advises that amendments to the SA should be appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/or is likely to give rise to significant effects. An appropriate and proportionate approach has been taken and the proposed MMs have been screened using professional judgment to assess their likely significance with regard to SA/SEA and HRA. Any MMs that might be significant would have to be further

¹ <https://www.coventry.gov.uk/downloads/file/40740/hmo-dpd-submission-version-2023>

² <https://www.hwa.uk.com/projects/coventry-city-council-hmo-dpd/>

³ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

assessed using the same method with SA Framework of Objectives (Table 2.1 SA Report, 2022) and the implications for the previous findings considered.

2.0 SCREENING THE PROPOSED MAIN MODIFICATIONS (MMs) FOR SA & HRA SIGNIFICANCE

2.1 The proposed MMs were screened for their significance with regard to SA, SEA and HRA, as set out in the following Table 2.1:

Table 2.1: Screening the Proposed MMs for SA/SEA & HRA Significance

MM No.	DPD Ref.	Summary of Change	Significant for SA/SEA or HRA?
01	Para 3.10	Amended text to ensure clarity - ... <i>"an assessment must be made as to whether a material change of use from the prior lawful use has occurred and, if it is determined that it has, then planning permission is required."</i>	No
02	Policy HMO1	<i>"All proposals for the conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold - provision of HMOs will be required to demonstrate..."</i> Delete existing criterion (b) to address unnecessary overlap with another consent regime and difficulties in practical application; replace with new criterion - <i>"there will be sufficient capacity either off street or on street to meet the parking requirements of the proposed development."</i> Changes to improve clarity, effectiveness and avoid duplication between policies HMO1 and HMO4.	No
03	Justification Para 5.7	New paragraph at beginning - to ensure long term resilience, clarity and effectiveness of the policies. The policy must be read in conjunction with the adopted Local Plan; acceptable levels of accessibility will be determined through the adopted Transport Strategy and the liveable neighbourhoods approach.	No
04	Policy HMO2	Amendments to text to ensure clarity and effectiveness and to avoid duplication. ... <i>"HMO applications will not be supported permitted."</i> ... <i>"HMO applications will be considered against the other Policies in this DPD and all other relevant development plan policies."</i>	No
05	Justification Para 5.9	Additional text to ensure clarity & effectiveness of policy - <i>"Overconcentration of HMOs can cause imbalance, leading to the problems identified in section 4. This includes increased</i>	No

		<p>levels of anti-social behaviour and noise within their immediate vicinity and on routes linking them with the city centre. This policy seeks to ensure that potentially harmful concentrations do not arise and that existing living conditions of residents in the vicinity of the proposed site and along those connecting routes are maintained."</p>	
06	Policy HMO3	<p>Amendments to ensure clarity & effectiveness of policy: ...three single residential properties dwellings... ...and or...</p>	No
07	Justification Para 5.12	<p>Additional text to provide clarity on the scope of the calculation in respect of interpretation of HMO3.</p>	No
08	Policy HMO4	<p>To ensure consistency between HMO4 & HMO1; to manage heritage, living conditions & flood risk consistent with the NPPF; & to provide sufficient certainty in the interests of the effectiveness of the policy:</p> <p>"All proposals for the conversion to or construction of HMO accommodation or the intensification of an existing HMO above its permitted occupancy threshold provision of HMOs will be assessed against must meet the following criteria:"</p> <p>b) ..."on the amenity of the occupants of neighbouring properties"...or disturbance arising from the proposal:</p> <p>c) "the proposal does not affect a designated or non-designated historic heritage asset assets or its setting in a manner which would represent unjustified harm to its significance;</p> <p>All proposals will be expected to demonstrate</p> <p>h) how the relevant 'Secured By Design' standards principles have been met including the preparation of a management plan to demonstrate how the crime prevention measures will be maintained, and</p> <p>i) how, in areas at risk of flooding, the safety of those sleeping in any ground floor accommodation will be secured;"</p>	No
09	Justification Para 5.15	<p>New sentence for clarity at end of para – "The minimum room size requirements are based on figures set out within the Councils HMO licensing standards – to ensure clarity & effectiveness of policy."</p>	No

10	Justification Para 5.16	To ensure clarity & assist in interpretation of policy to manage flood risk consistent with the NPPF: <i>“HMOs often have ground-floor sleeping accommodation which puts those on the ground floor at the highest risk of flooding. Criteria (i) requires the applicant to demonstrate how any identified potential flood risk would be addressed. This may include the incorporation of appropriate site specific mitigation such as raising floor levels, flood resistant construction and the preparation of a Water Exclusion Strategy.”</i>	No
11	Section 6, Stage 3	New sentence added to ensure clarity and effectiveness of the calculations based upon the most up-to-date available data: <i>“In calculating the 10% concentration level, this will be determined for extant permissions based on data derived from Coventry’s Council tax data and other appropriate data sources during the planning application determination period.”</i>	No
12	New section Monitoring	New section identified a range of monitoring requirements linked to the policies of the DPD & progressed through the Council’s AMR process. An indicator is set out for each of the four HMO policies HMO1-4.	No

2.2 There are no proposed changes to the DPD that would substantially alter the plan. Most of the proposed main modifications are to provide greater clarity, correction, avoid repetition, for consistency, and for updating, and to ensure the effectiveness of the policies. As such, these changes are not significant for the findings of the assessment processes.

2.3 There are some proposed changes to policy wording and these might have been of significance to the assessment processes. MM02 includes changes to Policy **HMO1** Homes in Multiple Occupation (HMOs). Additional text for the first sentence beginning *“All proposals... provides sufficient certainty to the reader about the policy requirements. The deletion of criterion b) on Accessible Homes standards and the new criterion b) on parking requirements avoids duplication between policies HMO1 and HMO4. These changes are not significant for the findings of the assessment processes.*

2.4 Policy **HMO2** Concentrations and Thresholds includes a change from *“will not be supported”* to *“will not be **permitted**”* and this strengthens the policy, ensuring further clarity and effectiveness. Text amended to clarify that each application will be considered in accordance with the adopted plan – to avoid duplication. Policy **HMO3** Sandwiching includes one change *“three single residential properties **dwellings**”* and two from *“and”* to *“**or**”* – again for

clarity and effectiveness. These changes are not significant for the findings of the assessment processes.

- 2.5 Policy **HMO4** Amenity and Design now requires that all proposals "**must meet**" the criteria – and this will strengthen the policy. Criterion b) makes explicit that there should be no adverse impact on the amenity "*of the occupants*" thus providing more clarity. Criterion c) includes additional wording for clarification to make explicit that the proposal does not affect a heritage assets (both designated and non-designated), or its setting, in a manner that would represent unjustified harm to its significance. This will strengthen the mitigation measures provided through such policy wording and as assessed with SA Objective No 8 that aims to protect and enhance the historic environment and the setting of heritage assets. The SA findings for overall neutral effects are confirmed. Criterion h) requires preparation of a management plan to demonstrate how the crime prevention measures will be maintained – ensuring that the mitigation measures through policy wording will be implemented and maintained. These changes ensure that heritage, living conditions & design will be managed consistently with the NPPF. As such, the findings of the SA are not affected.
- 2.6 Criterion i) addresses ensuring safety from flood risk of those sleeping in any ground floor accommodation – thus, strengthening the policy. This matter arose from discussions with the Environment Agency. The additional criterion makes explicit the mitigation measure through policy wording for risk to health through ground floor flooding. Flood risk and climate change had been scoped out of the SA/SEA (and agreed through scoping consultation with the statutory environmental bodies) since it was considered that all development proposals would have to comply with national requirements regarding flood risk and the adopted local plan. This additional criterion ensures that the management of flood risk is consistent with the NPPF - and thus will support the findings of the SA including SA Objective No 12 Flood Risk and SA Objective No 4 Health. Policies provide sufficient mitigation measures to ensure that there are no significant negative effects associated with flood risk.
- 2.7 The proposed MMs include a new section 7 **Monitoring** that clearly explains the monitoring requirements and how they link to the Council's annual Monitoring Report. A specific indicator is provided for each of the four policies. The SA (December 2022) had considered that the Coventry monitoring strategy for the Local Plan is considered satisfactory for the requirements from the SA process. The provision of specific indicators for the HMO policies will further ensure that the effects of the DPD and the predictions of the SA will be more clearly monitored.
- 2.8 The submitted SA Report (December 2022) that was examined alongside the draft HMO DPD found that overall, the implementation of the DPD is likely to have positive effects for housing, balanced communities, and health and wellbeing. The provision of concentrations and thresholds will better ensure that the intentions are deliverable and that mitigation measures are implemented. This will resolve existing sustainability problems, and avoid exacerbation of further cumulative negative effects such that overall positive effects are indicated.

- 2.9 The SA had found that there was strong mitigation provided through HMO policy requirements to mitigate potential negative effects for amenity and character of Coventry areas. This included consideration of avoiding/reducing likely cumulative effects for social isolation, anti-social behaviour, amenity and visual impacts, poor air quality and traffic/parking, nuisance noise, and poor waste management. The proposed MMs to the HMO DPD ensure further clarity and effectiveness of the policies. With such further strengthening of the mitigation provided through policy wording, the findings of the SA are still relevant and further confirmed. There are no negative effects indicated.
- 2.10 There are no negative effects indicated and there are no implications for the **HRA** findings. An updated HRA screening (April 2022) was undertaken in respect of the emerging HMO DPD. This concluded that there would be no likely significant effects (LSEs) on the integrity of identified nearby designated sites, alone or in-combination. During the consultation of the SA scoping and HRA screening, Natural England advised that they agreed with the conclusions reached.

3.0 SUMMARY & NEXT STEPS

- 3.1 The implications of the proposed MMs on the findings of the previous SA/SEA and HRA have been investigated. The MMs were screened for their significance with regard to the assessment processes. Most amendments are to provide further clarity, ensure effectiveness of the policies, and the changes do not substantially alter the plan. Overall, the previous findings of the SA/SEA remain relevant and valid. Proposed changes to Policies HMO1-4 ensure better clarity and the effectiveness of the policies such that the mitigation measures provided through the policy wording are also strengthened. The findings of the SA are confirmed – positive effects are enhanced through clarity and removal of any uncertainty. There will be no significant negative effects. The previous findings of the HRA remain relevant and valid - the Coventry HMO DPD will not have adverse effects on the integrity of protected sites, alone or in combination.
- 3.2 The proposed MMs will be subject to public consultation commencing as soon as reasonably practicable but will be post the May 2024 local election period, including this SA Addendum Note. The Inspector will consider any representations made and then her final report is anticipated later in 2024. Upon adoption of the modified Plan, an SA Adoption Statement will also be prepared and published, in accordance with regulatory requirements.

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Coventry City Council

Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

Adoption Statement

The Town and Country Planning (Local Planning) (England) Regulations 2012

Notification under Regulations 26 and 35

Title: Homes in Multiple Occupation (HMO) Development Plan Document (DPD)

Area Covered: The HMO DPD covers the administrative area of Coventry City Council.

Subject Matter: The HMO DPD is a document expanding the existing Local Plan policy (H11) and introducing standards for the informed assessment of proposals for HMOs that will positively contribute to the housing offer within the city since the adoption of the Local Plan. The DPD sets out policies that aim to ensure HMOs can provide important accommodation for a range of people including those entering the housing market. However, they can also bring significant disruption to settled neighbourhoods. To ensure that HMOs can only come forward in ways that integrate with existing neighbourhoods the policies aim to provide a comprehensive policy approach to how such proposals can be determined and assessed as and when formal planning applications are submitted. The DPD will form part of the Development Plan for the city and therefore decisions on planning applications must be made in accordance with it, unless other material considerations indicate otherwise. The DPD adoption date is **25 March 2025**.

Examination: The HMO DPD has been subject to examination by an independent Inspector appointed by the Secretary of State and a number of modifications were made to the DPD as set out in the Schedule of Main Modifications that accompanied the Inspector's Report. Pursuant of Section 23 (3) of the Planning and Compulsory Purchase Act 2004, the adopted DPD incorporates these modifications.

Inspection: A copy of the DPD as adopted together with the Sustainability Appraisal adoption statement, the Inspector's Report, schedule of main modifications, schedule of additional modifications and Adoption Statement are available to view on the Council's website: www.coventry.gov.uk/planning-policy/homes-multiple-occupation-development-plan-document

Hard copies of the adopted DPD, the Sustainability Appraisal adoption statement and the Inspector's Report are also available to view at the following locations during normal opening hours (times available through the website links below):

1. Coventry City Council, PO Box 7097, Coventry, CV6 9SL
www.coventry.gov.uk/contactus

2. All libraries within the city: www.coventry.gov.uk/libraries-1/join-find-use/3

Challenge: Any person aggrieved by the HMO DPD may make an application to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004, on the grounds that:

- a) the document is not within the appropriate power (i.e. the Council has acted beyond its legal power or authority in producing it).
- b) a procedural requirement has not been complied with.

An application must be made promptly, and in any event, no later than the end of the period of six weeks of the date of the adoption of the DPD i.e. by **23:59 06 May 2025**. For further information please contact Coventry City Councils Planning Policy Team: planningpolicy@coventry.gov.uk

DRAFT



Public report
Cabinet

**Education and Children's Services Scrutiny Board (2)
Cabinet**

13 March 2025
18 March 2025

Name of Cabinet Member:

Cabinet Member for Education and Skills – Councillor K Sandhu

Director approving submission of the report:

Director of Children and Education

Ward(s) affected: All

Title: Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996

Is this a key decision? No

No - although the proposals affect more than two electoral wards, the impact is not expected to be significant.

Executive summary:

Section 19 of the Education Act 1996 places a duty on Coventry City Council (the Council) to make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive a suitable education unless such arrangements are made for them.' This applies to all such children who are resident in the area, whether they are on the roll of a school, and whatever type of school they attend.

This means that where a child cannot attend their educational setting because of a physical or mental health need, or due to an exclusion, or for any other legitimate reason, the local authority is responsible for arranging suitable provision.

The legal duty applies to children of compulsory school age (5-16 years) who would normally attend schools, including academies; free schools; special schools; alternative provision and independent schools. The legal duty does not apply to children under compulsory school age or who will cease to be of compulsory school age within the next six weeks and does not have any relevant examinations to complete.

All local authorities should have a written, publicly accessible Policy Statement on their arrangements for complying with the Section 19 duty. The purpose of this new Policy is to ensure the Council has an integrated Policy under the Section 19 Duty (permanent exclusion, ill health and otherwise) that complies with legal duty.

The Policy (Appendix A) sets out the Council's approach to meeting the needs of children of compulsory school age for whom it has a legal responsibility to provide an education, but who for reasons relating to illness, exclusion from school or other reasons experience barriers to accessing a full and suitable education offer. This Policy will provide greater clarity to schools and parents/carers as to when the duty should apply, and confirmation regarding the Council's approach.

Prior to implementing provision under Section 19, the Council would expect schools to have fulfilled their legal obligations and followed statutory guidance, such as the graduated response set out in the SEND Code of Practice, and to have made reasonable adjustments required under the Equality Act 2010.

The Policy sets out the decision-making process which the Council will use to determine when it has a duty to make provision under Section 19, and the type of provision that the Council will make in order to comply with Section 19 duties.

This provision may include, but is not limited to:

- the Council advising and supporting schools to make reasonable adjustments where it considers that the child/young person could be appropriately supported to receive education and/or attend school,
- the Council securing Alternative Educational Provision.

Recommendations:

The Education and Children's Services Scrutiny Board (2) is recommended to consider the report and make any comments and/or recommendations to the Cabinet at their meeting on 18 March 2025

Cabinet is recommended to:-

- a) Consider any comments and/or recommendations received from the Education and Children's Services Scrutiny Board (2)
- b) Approve the Policy and approach for supporting children who are unable to attend their education setting under Section 19 of the Education Act 1996
- c) Delegate authority to the Director of Children and Education Services and the Director of Finance and Resources to oversee, monitor and implement the Policy.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Supporting Children who are unable to attend their education setting (Section 19 of the Education Act 1996) Policy.

Appendix 2 – Equality Impact Assessment

Background papers:

- The Education Act 1996
- The Equality Act 2010
- 'Alternative Provision' Statutory Guidance (2013)
- The Children and Families Act 2014
- 'Supporting pupils at school with medical conditions' Statutory Guidance (2015)
- SEND code of Practice (2015)
- 'Arranging education for children who cannot attend school because of health needs' Statutory Guidance (2023)
- Summary of responsibilities where a mental health issue is affecting attendance' Guidance (2023)
- Out of School. Out of Sight LGSCO Focus Report (2023)
- 'Suspension and Permanent Exclusion Guidance' (2024)
- 'Working together to improve school attendance' Guidance (2024)
- 'Providing remote education' Guidance (2024)
- 'Arranging Alternative Provision (2025)

Other useful documents

[Extended School Non-Attendance Advisory Panel \(ESNAAP\) – Coventry City Council](#)

Has it or will it be considered by Scrutiny?

Yes -Education and Children's Services Scrutiny Board (2) - 13th March 2025

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: Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996

1. Context (or background)

- 1.1 In August 2024, the Department for Education (DfE) introduced new statutory guidance for schools and LAs, 'Working Together to Improve School Attendance' the DfE also updated other relevant guidance documents including, the Suspension and Permanent Exclusions Guidance. This guidance sits under Section 19 of the Education Act 1996, which places a duty on Local Authorities (LA) to 'Make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive a suitable education unless such arrangements are made for them.' This applies to all such children who are resident in the area, whether they are on the roll of a school, and whatever type of school they attend.
- 1.2 All local authorities should have a written, publicly accessible Policy statement on their arrangements for complying with the Section 19 duty. The Council has had arrangements and process in place for delivering Section 19 duty including through the InspirED Service (formerly Hospital Education), but these arrangements are not currently included in an approved Policy. This Policy will, therefore:
 - provide clarity regarding roles and responsibilities of schools, the Council and other agencies (including financial).
 - ensure that all Children and Young People (CYP) have access to a suitable, full-time education which meets their individual needs
 - ensure, when a child of compulsory school age is unable to access their educational setting due to illness, exclusion or otherwise, the Council complies with its duty under section 19 of the Education Act 1996 to ensure suitable provision for them.
- 1.3 The Council seek to deliver their statutory duty of securing 6th day provision for children and young people who are excluded from school through the use of the Fair Access Protocol, Keys Intervention, Coventry Alternative Provision Academy and/or other registered Alternative Provision. The existing arrangements will continue and there is some further information below on work underway in the city to provide early intervention and support for children and young people at risk of permanent exclusion.
- 1.4 Based on current information it is expected that the numbers of children unable to access educational provision due to illness or otherwise, where Section 19 duty applies, will be low. Notwithstanding, following the Covid 19 pandemic there has been an increase (nationally and locally) in the number of children and young people missing education, as evidenced through published school attendance information.
- 1.5 The Local Authority currently operate an advisory panel for children with extended non-attendance at school (ESNAAP). The purpose of the panel is to consider action taken by schools to support children and young people and, where appropriate, recommend additional support, either through the LA's in-house provider; InspirED

Pathways or another provider of alternative provision (AP) procured via the Coventry Alternative Provision framework.

- 1.6 Between September 23 and February 25 on average the panel received 15 referrals per month, and approximately 4 young people per month have received support from InspirED Pathways. In addition, in the current academic year a total of 23 children and young people were brought to the attention of the Local Authority as potentially requiring provision under Section 19. As of February, one has been identifying as meeting criteria for Section 19 and a further three cases are in the process of being decided.
- 1.7 As part of the SEND inspection framework in use from early 2023 there have been a series of thematic inspections focusing on alternative provision to consider whether the approach to commissioning and overseeing alternative provision arrangements for children and young people in the local authority area meets the duties as set in in section 19 of the Education Act 1996. The Thematic Review report was published in February 2024 and found that a lack of national standards and a lack of clarity on responsibilities for alternative provision commissioning and oversight is leading to inconsistent and ineffective practice. The DfE 2023 SEND and AP Improvement Plan proposes an integrated system to plan and commission support for children.
- 1.8 In Coventry there is a clear provider framework and an effective service that monitors and oversees alternative provision. Under the revised Policy, the Council can secure Section 19 provision from a wider range of providers, through Coventry's Alternative Provision (CAP) Graduated Model of Support, which is overseen by the Coventry Education Partnership.
- 1.9 The Coventry Education Partnership is made up of local organisations including the Local Authority and schools. It is committed to ensuring that all children and young people have access to high-quality education and the necessary support to thrive. The Partnership's vision is to equip young people with the skills, qualifications, knowledge, and experiences essential for their success in education and transition to adulthood.
- 1.10 The Coventry Alternative Provision (CAP) Graduated Model of Support enables young people to remain in mainstream education wherever possible. This model, overseen and supported by a multi-agency panel and independent chair, provides universal support as part of a broad and varied curriculum, targeted interventions, time-limited programmes and transitional support placements in alternative provision focused on reintegration into mainstream education or a suitable post-16 destination.
- 1.11 Underpinning this model will be a 'Belonging Strategy and Training Pathway for all schools across Coventry to operate within. Through this framework and belonging approach, the Partnership aims to improve opportunities for disadvantaged children and young, increasing their engagement and improving their academic, social, and emotional development; in turn resulting in reduced suspensions, exclusions, and persistent absence.
- 1.12 By ensuring the right support is in place at the right time, the Education Partnership is committed to reducing the number of students missing out on full-time education and

improving successful reintegration into mainstream settings after alternative provision interventions.

2. Options considered and recommended proposal

- 2.1. A Section 19 Policy is required to ensure compliance with statutory duty.
- 2.2. The Council could have continued to operate current arrangements without a formal Policy, but this approach could leave the Council open to challenge (including legal) as there is a lack of clarity regarding roles and responsibilities of schools, the Council and other agencies, which in turn may impact on our ability to ensure the Council complies with its duty under Section 19 of the Education Act 1996 regarding suitable provision.
- 2.3. It is therefore recommended that the Policy at Appendix 1 is adopted.

3. Results of consultation undertaken

- 3.1. Prior to implementation of the current arrangements (described above in Section 1), consultation was undertaken with a range of stakeholders, including parents, carers and young people; school leaders and professionals from across Education, Health and Care. The consultation identified three principal aims, which underpin the Council's work in this area:
 - Promoting wellbeing, happiness and an optimistic outlook for all
 - Offering compassionate, person-centred support to students whose attendance is beginning to fall
 - Nurturing the resilience of children and young people who are not attending school and helping them to re-engage with learning.
- 3.2. Outcomes from the consultation were published in 2021 and underpin current Council guidance to schools. The current Policy formalises these arrangements.
- 3.3. A Secondary Education Partnership Working Group have overseen the current Behaviour and Alternative Provision arrangements in place since September 24. This group continues to shape the work discussed in Section 1.
- 3.4. The implementation of the Section 19 Policy has been discussed at Education Partnership meetings in February 2025. The Education Service will continue to work in partnership with stakeholders in the city to implement the new arrangements.

4. Timetable for implementing this decision

- 4.1. Once approved, the Council will implement the Policy and new arrangements from the 1st April 2025. As highlighted above, this will be done in partnership with relevant stakeholders in the city.

5. Comments from Director of Finance and Resources and Director of Law and Governance

Financial Implications

- 5.1. When the Council has determined that Section 19 applies, alternative provision for children with medical needs and children who have been permanently excluded is funded from the High Needs block within local authorities Dedicated Schools Grant (DSG) budgets.
- 5.2. However, where a child remains on the roll of their home school but requires a period of time in alternative provision due to their health needs, the local authority will seek to recover from the home school a proportionate amount of the school's funding associated with that child to support with funding the provision. This ensures that the funding follows the child. This arrangement would cease when the child is reintegrated back to their home school or are no longer on the roll of the home school.
- 5.3. Where a pupil leaves the roll of their home school due to permanent exclusion, or they leave the roll of a mainstream school for reasons other than a permanent exclusion resulting in them receiving education funded by the local authority, a mandatory funding adjustment is made. Details of these adjustments are set out in the 'Redetermination of budgets' section within the Schools Operational Guide, a link to which can be found [here](#).
- 5.4. As part of the annual consultation on High Needs Block funding with Schools Forum in March we will ask them to endorse the financial implications associated with this Policy. Further work will be carried out to review funding arrangements across all elements of alternative provision to ensure alignment.
- 5.5. All local authorities should have a written, publicly accessible Policy statement on their arrangements for complying with the Section 19 duty. This Policy is not proposing any savings. However, the intention is for it to provide more clarity and facilitate robust decision making, both from an educational and financial perspective. The financial implications will be managed within the overall High Needs budget setting / monitoring process, and the impact will be closely monitored post implementation.
- 5.6. Nationally and locally the High Needs block is an area of pressure due to increasing SEND demand, alongside increasing numbers of children absent from school due to permanent exclusions and other reasons. Coventry currently has a DSG surplus, but in line with national trends it is continuing to experience significant growth in the overall number of Education Health and Care Plans (EHCP's). It is therefore key that the Council monitors the overall High Needs position and manages resources effectively to ensure that it remains within funding allocations as far as is possible.

Legal Implications

- 5.7. In August 2024, the Department for Education (DfE) introduced new statutory guidance for schools and LAs, 'Working Together to Improve School Attendance' the DfE also updated other relevant guidance documents including, the Suspension and Permanent Exclusions Guidance, so there was a requirement to review our approach.
- 5.8. As a result, all local authorities are required to have a written, publicly accessible Policy statement on their arrangements for complying with the Section 19 duty.

- 5.9. The Policy complies with this requirement provides and provides clarity that Section 19 referrals for children on roll at a school will be made via a statutory sickness return which schools now have to complete if a child has been absent for 15 days, either cumulatively or continuously in an academic year. Similarly, the Policy confirms the process for children not on a school roll, who to contact when Section 19 may apply.
- 5.10. The Policy sets out outcomes, which may include, but are not limited to:
- the Council advising and supporting schools to make reasonable adjustments where it considers that the child/young person could be appropriately supported to receive education and/or attend school,
 - the Council securing Alternative Educational Provision
- 5.11. The Policy clearly sets out that all provision under Section 19 will be regularly reviewed at a minimum level of every 6 weeks. The council will work with all parties to consider the appropriateness of the child returning to their host school wherever possible, with the child's best interests being at the heart of all decision making.
- 5.12. Outcomes for children and young people, the length of the support provided under Section 19 and spend will be closely monitored under the new Policy.

6. Other implications

How will this contribute to the One Coventry Plan?

- 6.1. The Policy directly addressed the overarching vision of the One Coventry Plan to improve the lives of those who live and study here.
- 6.2. The Policy delivers against the priority of tackling inequalities within our communities; outcomes for children with extended non-attendance from school are known to be significantly lower than those for children with high attendance. Low attendance affects not just academic attainment but also the mental health of children and their families.
- 6.3. The Policy will also help to improve economic prosperity. This is because low attendance and the mental health needs that accompany it create challenges for parents to sustain employment. Supporting families earlier through Section 19 provision will reduce the likelihood of situations reaching this point.

How is risk being managed?

- 6.4. The implementation of a Policy and clarity of roles and responsibilities means there is a risk that there will be increased requests for support particularly in relation to illness and otherwise. This will be managed in line with the continuum of statutory guidance and legislation in relation to pupils absent from school, and particularly the recent statutory guidance 'Working together to improve school attendance' Guidance (2024).

What is the impact on the organisation?

- 6.5. The duties in relation to Section 19 will be delivered within existing staffing resource. The Education Management Restructure implemented in February 2025 amended existing posts and introduced a Lead for Children Absent from Education role which will be the Council's named officer for this area - a requirement of the statutory guidance. This role reports to the Head of Education Entitlement and Enrichment Services which has wider responsibility for Attendance, Children missing Education, Behaviour and Coventry Alternative Provision.

Equalities / EIA?

- 6.6. Legislation requires the council to undertake Equality Impact Assessments (EIA) on its functions; policies, strategies, plans and decisions. An EIA has been undertaken for the new Policy, which has identified that the Policy will have a positive impact for children aged 0-18, particularly those with a disability.
- 6.7. Further information will be gathered to confirm the impact of the Policy on race, religion, sexual orientation and gender reassignment. The relationship between these characteristics and school-non-attendance is complex, however, it is anticipated that the Policy - which facilitates access to education - will have a positive impact for children and young people who have experienced difficulties attending school which relating to one of the above protected characteristics. A copy of the EIA is included at appendix 2.

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

None.

Implications for partner organisations?

- 6.9. The current arrangements for have a panel that is made up of professionals from:

- Coventry's SEND team,
- Attendance and Children Missing Education team,
- InspirED Pathways,
- Coventry Alternative Provision,
- the Education Psychology Service,
- Early Help and Health.

The panel currently meets once a month to discuss referrals and agree on the advice and guidance to be given to each school for their consideration.

The new Policy and arrangements will continue to have a panel approach and will continue to require support from the same colleagues and organisations.

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DRAFT Policy
Coventry City Council

Supporting Children who are unable to attend their education setting (Section 19 of the Education Act 1996) Policy.

1. Introduction

- 1.1. Coventry City Council (the Council) is committed to ensuring that every child in Coventry has the opportunity to benefit from high quality, inclusive, accessible education, to enable them to thrive and fulfil their individual potential.
- 1.2. The Council is committed to working with schools, children and young people, health and social care partners, to ensure all children are able to regularly attend an appropriate education setting. All children and young people in Coventry deserve an education that enables them to flourish, now and into the future, reach their full potential and maximise their life chances as they move into adulthood.
- 1.3. The Council recognises that it has a shared responsibility with schools and partner agencies to successfully implement this policy and promote high quality integrated service provision to support positive outcomes for this cohort of children and young people (CYP).
- 1.4. This policy outlines the Council's legal duties under [Section 19 of the Education Act 1996](#), to make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise may not for any period receive suitable education.
- 1.5. The term 'suitable education' is defined¹ as efficient education suitable to the child's age, ability, and aptitude, and to any special educational needs he or she may have.

¹ Section 19(6) Education Act 1996

- 1.6. The policy applies only for children who are ordinarily resident in Coventry and who are of compulsory school age whether on a school roll or not. It does not apply in the case of a child (a) who will cease to be of compulsory school age within the next six weeks, and (b) does not have any relevant public examinations to complete.
- 1.7. When it has been established that Section 19 provision is required, the Council will be responsible for providing this to children and young people who are ordinarily resident in Coventry.
- 1.8. This policy and process sets out the Council's approach to meeting the needs of children for whom it has a legal responsibility to provide education but who for reasons relating to illness, exclusion or otherwise experience barriers to accessing a full and suitable education offer within a school. The Council expects schools to have fulfilled their legal obligations and followed statutory guidance such as the graduated response, as outlined in the SEND Code of Practice, and have made reasonable adjustments required under the Equality Act 2010.

2. Legislation and Guidance

- 2.1. This policy has been written with due regard to the following legislation and statutory guidance:
 - The Education Act 1996
 - The Equality Act 2010
 - 'Alternative Provision' Statutory Guidance (2013)
 - The Children and Families Act 2014
 - 'Supporting pupils at school with medical conditions' Statutory Guidance (2015)
 - SEND code of Practice (2015)
 - 'Arranging education for children who cannot attend school because of health needs' Statutory Guidance (2023)
 - Summary of responsibilities where a mental health issue is affecting attendance' Guidance (2023)
 - Out of School. Out of Sight LGSCO Focus Report (2023)
 - 'Suspension and Permanent Exclusion Guidance' (2024)
 - 'Working together to improve school attendance' Guidance (2024)
 - 'Providing remote education' Guidance (2024)
 - 'Arranging Alternative Provision' (2025)

3. Aims of the policy

- 3.1 To provide clarity regarding roles and responsibilities of schools, the Council and other agencies.
- 3.2 To ensure that all CYP have access to a suitable², full-time education which meets their individual needs to enable them to thrive and fulfil their ambitions and aspirations.
- 3.3 To ensure, when a CYP of compulsory school age is unable to access their educational setting due to illness, exclusion or otherwise, the Council complies with its duty under section 19 of the Education Act 1996 to ensure suitable provision for them.

4. Defined Categories and Process

- 4.1 This section provides an overview of the Council's processes and offer for CYP who require a Section 19 response under the three identified categories:
 - Permanent exclusion
 - Ill Health
 - Otherwise
- 4.2 A decision will be communicated to the school and parents no more than five working days after a decision has been made by the Extended School Non-Attendance (ESNAP) panel (refer to Appendix 1 for further information on the process and panel). If the CYP has an Education & Healthcare Plan, then an annual review may be required.

Permanent Exclusion

- 4.1 If a CYP has been permanently excluded from school, the Council must arrange suitable education from the sixth day following the exclusion.

The headteacher/school is required to report permanent exclusions to the Council without delay, in-line with the Suspension and Permanent Exclusion [Statutory Guidance](#) and Coventry City Council (CCC) Exclusion Guidance. Schools are requested to notify the Council via exclusions@coventry.gov.uk

² "suitable education", in relation to a child or young person, means efficient education suitable to his age, ability and aptitude and to any special educational needs he may have.

and their MIS system. If schools have any queries these should be sent to exclusions@coventry.gov.uk

- 4.2 If a CYP is unable to attend school due to a permanent exclusion, suitable education will be arranged by the Council within the statutory timescales. It is critical that the excluding school provides all relevant and appropriate information via the Pupil Passport to support the best possible placement and desired outcomes.
- 4.3 Following a permanent exclusion, the Council, working together with relevant education settings, the CYP's family, and wider agencies are responsible for enabling the child or young person to reintegrate back into a sustainable education place.
- 4.4 If the Council has offered a package of alternative education that it deems to be suitable for the CYP, it is not under a duty to provide a different package of education if the CYP or their family elects not to take up the provision.

III Health (physical and mental health)

- 4.5 The Children and Families Act 2014, the SEND Code of Practice 2015, and Supporting Pupils at Schools with Medical Conditions 2015 highlights schools' legal duty to support pupils with medical conditions through the delivery of reasonable adjustments and otherwise.
- 4.6 The Council undertakes Targeting Support Meetings (TSMs) as part of its Attendance Duties. These meetings:
 - help identify, discuss, agree and monitor action plans and joint approaches for severely absent pupils; and
 - discuss and agree approaches for persistently absent pupils where they have barriers to attendance that require a multi-agency response to overcome.
- 4.7 In most cases, schools will effectively support CYP using their own resources. However, in some situations, the Council may need to coordinate the support that a CYP requires. To help the Council determine when this is the case, schools should notify the Council using the Council's Online Sickness Absence Form (hyperlink to be added on publication of policy) when:

- A CYP is not accessing education, and
 - they have been absent for 15 days or more over the course of the same academic year, and
 - the reason for their absence is a single or series of linked medical conditions.
- 4.8 On receiving a notification, the Council will assess what support is required and reach a decision based on the DfE guidance (as outlined in section 2.1). The notification process is summarised in Appendix 1.
- 4.9 The Council will consider the individual circumstances of each CYP and take into account any evidence or advice when deciding whether separate arrangements should be made.
- 4.10 Where a CYP is attending school (albeit with periods of absence) the Council recognise that schools know children, families and their individual circumstances well, and will therefore use the information provided by the school as a basis for decision making.
- 4.11 Where a CYP has not attended school for an extended period, the Council will have regard to evidence available but may also seek information for example via assessments from professionals (such as Health and Social Care professionals, Early Help workers and Educational Psychologists) to inform decision making.
- 4.12 In all cases, it is important that the Council, school and family work together in the best interests of the child.
- 4.13 To ensure that children who are absent are supported effectively, the Council coordinates decision making and support through the Extended School Non-Attendance Panel (ESNAP). Terms of reference for the panel is included at Appendix 2. Outcomes from the ESNAP panel may include, but are not limited to:
- The Council advising and supporting schools to make reasonable adjustments if it considers that the CYP could be appropriately supported to attend school or an Alternative Provision.
 - The Council directly commissioning support through CAP Graduated Model of Support and/or securing other suitable education via the Council's education provision framework.

- 4.14 The Council also monitors attendance information provided electronically by schools and may use this as a basis for seeking further information from schools, to ensure that statutory duties are met.
- 4.15 Where a child is in hospital for an extended stay of more than five school days, or who have recurrent hospital admissions, the Council will ensure suitable education is in place to meet the education needs of the child through InspirEd Pathways (Hospital Education Provider).
- 4.16 Any Alternative Education Provision arranged should be considered as a time-limited intervention, with the expectation that it will support the CYP to reintegrate with education on the site of their host school at the earliest opportunity.

‘Otherwise’

- 4.17 Apart from illness and exclusion, there may be other reasons why a child cannot reasonably access their education provision. Consideration needs to be given to each case to determine if the Council’s duty under Section 19 of the Education Act 1996 to arrange suitable alternative education arises.
- 4.18 ‘Otherwise’ (as opposed to illness or exclusion) is intended to cover any other situation in which it is not reasonably possible or reasonably practical for a child to access and take advantage of any existing suitable schooling.
- 4.19 The Council will assess what support is required and reach a decision based on the DfE and associated guidance, set out at paragraph 2.1.

5 Roles and Responsibilities

The Council’s Responsibilities

- 5.1 The Council is responsible for ensuring that there is a named senior officer with responsibility for the provision of education for children and young people who are unable to attend school because of health needs. In Coventry, the named officer is the Lead for Children Absent from Education, and they can be contacted at attendance@Coventry.gov.uk.
- 5.2 The law does not define “full-time education” but where a CYP is under Section 19 provision, the education arranged by the Council should be equivalent to the education they would receive in a school. This may not mean

the same number of hours. If, for example, a child receives one-to-one tuition, the hours of face-to-face provision could be fewer as the education may be more intensive. Where full-time education would not be in a child's best interests for reasons relating to their physical or mental health, in line with s3AA Education Act 1996 and Arranging Alternative Provision Guidance 2025, local authorities must arrange part-time education on whatever basis they consider to be in the child's best interests.

- 5.3 Where a CYP receives provision under Section 19, this will be subject to regular meetings to review progress and need, with the intention for the CYP to reintegrate back into school or another suitable education provision.
- 5.4 The Council will facilitate effective liaison with all appropriate agencies and will ensure that there is minimum delay in starting appropriate support.

The school's responsibilities - In All Situations where the child remains on the school's roll

- 5.5 The school will retain safeguarding and school census responsibilities for all CYP for whom the Council arranges education provision as the sole or (main) dual registered provision. This includes exam entry responsibilities that fall under the remit of its Examinations Officer.
- 5.6 Where a CYP is eligible for free school meals the home school is responsible for ensuring that the entitlement is made available to that child, regardless of where learning is taking place. This is to be funded from the Free School Meal funding received from the Department for Education through a school's budget share.
- 5.7 If a school is not authorising an absence and/or believes that the attendance pathway might be needed, the school should approach their named Local Authority Attendance Officer for advice. These pupils should be discussed as part of the Targeting Support Meetings and schools should be following the School Attendance Matters process. <https://www.coventry.gov.uk/attendance-inclusion/attendance>.

The school's responsibilities – In the Case of Permanent Exclusion Only

- 5.8 The headteacher is required to report permanent exclusions to the Council without delay, in-line with the Suspension and Permanent Exclusion Statutory

Guidance and CCC exclusion guidance. Schools are requested to notify the Council via exclusions@coventry.gov.uk and their MIS system. If schools have any queries these should be sent to exclusions@coventry.gov.uk.

The school's responsibilities - In the Case of Ill Health Only

- 5.9 In some circumstances schools may not be able to fully support a CYP without the assistance of other agencies. Schools must therefore ensure arrangements are in place to support pupils as set out in 'Supporting pupils at school with medical conditions' Statutory Guidance 2015, and the schools own Medical Needs policy.
- 5.10 Schools should:
- Make use of internal services and resources, for example pastoral support, SEND resources and School Counselling.
 - Consider whether additional support from other external partners would be appropriate and make referrals e.g.: Early Help, Child & Adolescent Mental Health Service (RISE), health partners, Educational Psychology, Social Emotional & Mental Health Service (SEMHL) and Alternative Provision.
 - Where external support is provided schools should work with these services to deliver any subsequent support and keep a record of all support provided on school systems.
- 5.11 Where possible, CYP's health needs should be managed by the home school so that they can continue to be educated there with support, and without the need for Council intervention. Home schools are well-placed and experienced in providing support to children who are absent from school for shorter periods because of illness. Where it becomes clear that the absence is likely to be longer, or the home school can no longer support the child's health needs and/or provide suitable education, the school should notify the Council for support with next steps.
- 5.12 Schools should publish a policy for supporting children with medical conditions. This should set out how they will support children with health needs and provide details of a named person who can be contacted by the Council and by parents/carers.
- 5.13 Schools should maintain regular communication with the CYP and their parents/carers to promote engagement and welfare, monitor progress and any

safeguarding concerns. Schools should also ensure that children and young people and their parents/carers successfully remain in touch through school newsletters, emails, and invitations to school events.

- 5.14 Schools are required to make a Sickness Absence Return to the Council if a pupil is recorded in the attendance register as absent using code I (unable to attend because of sickness/ill health) and there are reasonable grounds to believe the pupil will have to miss 15 consecutive school days or more for illness, or the pupil's total number of school days missed during the current school year because of illness (whether consecutive or cumulative) will reach or exceed 15 school days (see Appendix 1).
- 5.15 All notifications should clearly show what support mechanisms the school has put in place to enable the CYP to remain in school e.g. robust universal and targeted provision evidence, Early Help, individual education plans.
- 5.16 A child unable to attend school because of health needs must not be removed from the school roll.

The school's Responsibilities - Otherwise

- 5.17 The 'Otherwise' category will be used for exceptional reasons only. In most cases, a child's situation will be captured adequately through one of the above categories. Given the likely complexities of individual cases, in the first instance, a conversation should take place between the school and their named Local Authority Attendance Officer to agree appropriate next steps under the School Attendance Matters process.

The role of the Parent/Carer

- 5.18 Where parents/carers decide to have their child registered at school, they have a legal duty to ensure their child attends that school regularly. This means their child must attend every day that the school is open, except in a small number of circumstances such as being too ill to attend or being given permission for an absence in advance from the school. Parents / Carers should familiarise themselves with their school's attendance policy including notification for illness.
- 5.19 If a parent/carers has any concerns about their child's attendance at school (e.g. the child's health is having an impact on their learning), in the first instance the

parent/carer should contact their child's school to discuss how they could properly support their child to enable them to have full access to education.

- 5.20 Parents/carers hold key information and knowledge and have a crucial part to play in liaising with the school and other services. Parents/carers are expected to work with their child's school to help them understand their child's barriers to attendance and proactively engage with any support offered.
- 5.21 In exceptional circumstances, if a parent/carer feels their child is unable to attend school despite the parent/carer working hard with professionals to get the child into school, and they are still not reasonably able to attend, the parent/carer should contact the Lead for Children Absent from Education at attendance@coventry.gov.uk

6. Identification and Referrals

- 6.1 The school/setting is responsible for notifying the Council using the process and online form set out in Appendix 1 including the Council's Online Sickness Absence Form (hyperlink to be added on publication of policy).
- 6.2 Where a child is not on a school roll (including new to city) and not well enough to attend a school setting the parent/carer should contact the Council's Admissions Service in the first instance.
admissions@coventry.gov.uk

7. Reintegration and Review

- 7.1 All CYP where Section 19 provision is arranged by the Council will be reviewed a minimum of every six weeks.
- 7.2 At each review, the Council will consider the appropriateness of the CYP returning to their registered school. The Council will work with the relevant provider, parents/carers and registered school to ensure the best outcomes for the CYP.

8. How to comment or complain

- 8.1 If parents/carers are concerned about the support being provided for their child by their school, it is important that they engage with the school / setting and discuss their concerns. If this does not resolve the issue, they should

follow their school's complaints procedure which should be available on the school website.

- 8.2 Where Section 19 provision is arranged by the Council a parent/carer should contact the Lead for Children Absent from Education where they have concerns. If this does not resolve the issue, they may make a formal complaint via the Council's complaints procedure, which can be accessed at: <https://www.coventry.gov.uk/contact-council/comments-compliments-complaints>

9. Funding Arrangements

- 9.1 When the Council has determined that Section 19 applies, alternative provision for children is funded from Coventry City Council's High Needs budget (within the Dedicated Schools Grant).
- 9.2 Where a child is on the roll of their home school but requires a period of time in alternative provision due to their health needs, the local authority will seek to recover from the home school a proportionate amount of the school's funding associated with that child to support with funding the provision. This ensures that the funding follows the child. This arrangement would cease when the child is reintegrated back to their home school or are no longer on the roll of the home school.
- 9.3 Where a pupil leaves the roll of their home school due to permanent exclusion, or they leave the roll of a mainstream school for reasons other than a permanent exclusion resulting in them receiving education funded by the local authority, a funding adjustment is made. The provisions act independently of whether a particular pupil has been on the census in the first place, and whether the school has received funding for them. Details of these adjustments are set out in the 'Redetermination of budgets' section within the Schools Operational Guide, a link to which can be found [here](#).

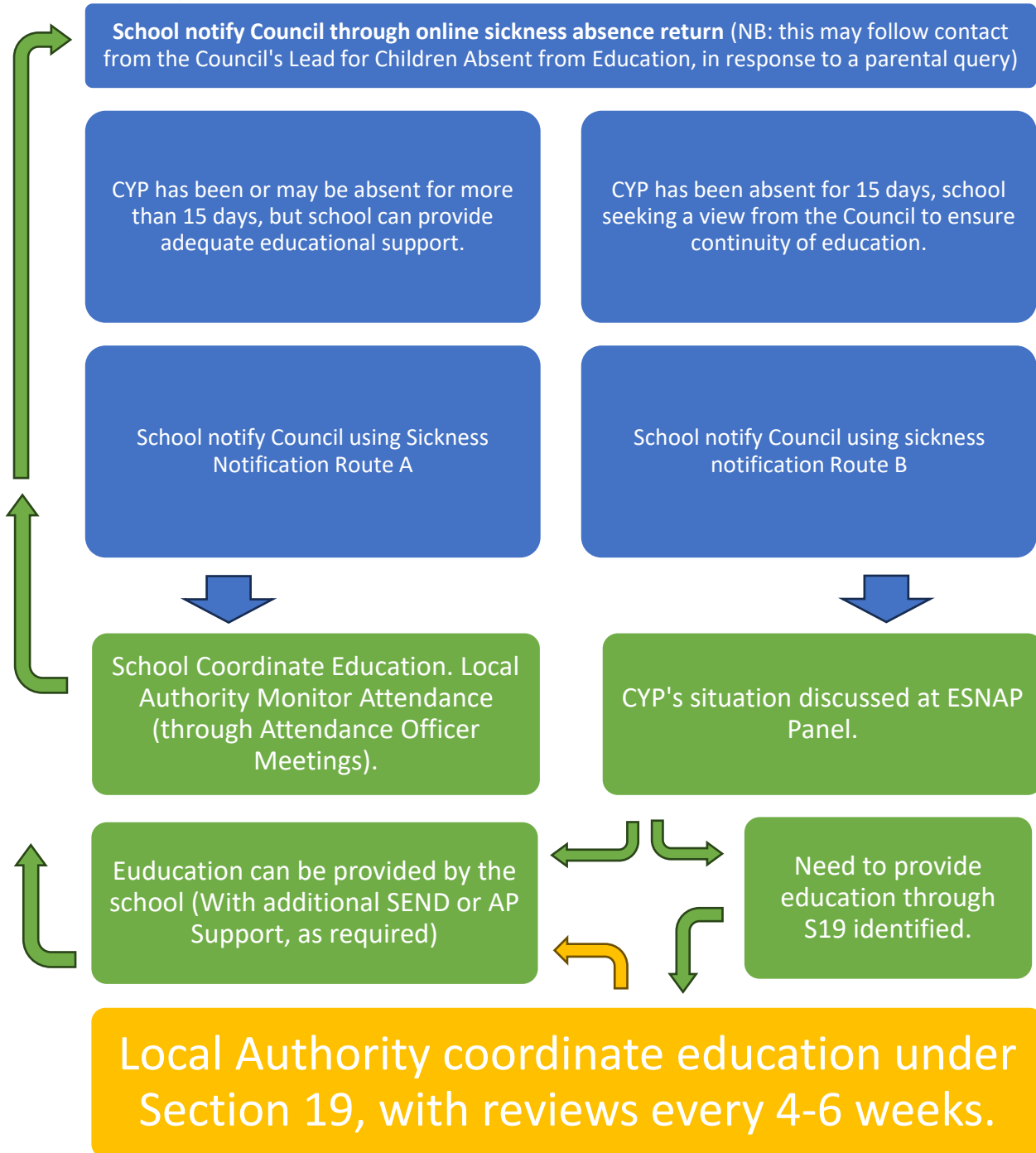
10. Review

- 10.1 This policy will be reviewed every three years or where major changes in legislation or policy requires it.

11. Appendices

Appendix 1

Notifying the Council of a sickness absence.



Appendix 2

Extended Non-Attendance at School Panel (ESNAP)

Terms of Reference

Purpose

The purpose of the panel is to:

- Help the Local Authority to comply with its duty to monitor the attendance of children in the local area who have missed, or are at risk of missing, fifteen days of education.
- Advise schools on how to support children who have not attended for an extended time, drawing on resources from within Coventry's Local Offer.
- Identify when the Local Authority needs to coordinate educational provision for a young person under Section 19 Education Act 1996 and, in such cases, determine what this provision should be.

Membership

Membership currently comprises the following roles. Membership is reviewed annually

Lead for Children Absent from Education (<i>Chair</i>)
Principal Educational Psychologist (<i>Deputy Chair</i>)
Head Teacher, InspirEd (<i>Deputy Chair</i>)
Representatives from the NHS and allied third sector health services
EHC Plan Coordinator
Access to Education Officer
Representative from Coventry Alternative Provision (CAP)
Early Help Assessment Coordinator
Administrative Lead

Meeting Frequency and Administration

The panel will meet once a month. Dates for meeting will be published on the Council website at the beginning of each academic year.

Referrals to ESNAP must be received one week prior to the panel meeting data, in order to allow for triage and meeting preparation. Referrals should be made via the Council's online absence return form.

An agenda for each meeting will be circulated to panel members in advance of each meeting, this will include a summary of all cases to be discussed.

A summary of key discussion points and agreed actions will be added to the proforma during each meeting.

Meeting Structure

The ESNAP Panel is split into three parts, as summarised below.

Stage	Summary	Outcomes
Triage <i>Completed by the Attendance Team, one week prior to the panel meeting.</i>	All cases are reviewed to confirm that referral criteria have been met and evidence has been provided.	If referral criteria are met and suitable evidence has been provided, then the case is allocated a slot for discussion at the multi-agency panel. If evidence is missing, then this will be requested from the school. If referral criteria are not met, the case will be returned to the school.
Multi-Agency Panel <i>With representation from Education, Health and Care (see membership)</i>	Where cases meet referral criteria they will be discussed by the multi-agency panel, to ensure that resources from within the school and from the Local Offer have been fully utilised. This part of the meeting is also used to monitor the progress of cases currently accessing Section 19 Provision.	New cases Where the panel identify further resource from within the school or local offer, that could meet educational need, the school will be informed of this and responsibility for making educational provision will remain with them. Where the multi-agency panel identify a potential need for provision to be made under Section 19, the case will be progressed to the resource allocation part of the meeting. Existing Cases For existing cases, where the panel determine that provision no longer needs to be made in line with Section 19, the school will be advised of the provision that they need to make.
Resource Allocation	Where a potential need	Where a need for Section 19 provision is confirmed, this will be coordinated by the Local

<p><i>Lead for Attendance; Head Teacher (Inspired) and Principal Educational Psychologist</i></p>	<p>for Section 19 provision is identified, cases are reviewed to confirm the type of provision that is required and whether the LA has a role in securing it.</p>	<p>Authority's Lead for Attendance, who will liaise with the school following the meeting.</p> <p>The case will then be reviewed in future ESNAP panel meetings.</p>
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EQUALITY IMPACT ASSESSMENT (EIA)

Title of EIA		Supporting Children who are unable to attend their education setting under Section 19 of the Education Act 1996
EIA Author	Name	James Gillum
	Position	Head of SEND
	Date of completion	24/02/25
Head of Service	Name	Rachael Sugars
	Position	Strategic Lead – Education
Cabinet Member	Name	Cllr Kindy Sandhu
	Portfolio	Education and Skills

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?

In August 2024, the Department for Education (DfE) introduced new statutory guidance for schools and LAs, 'Working Together to Improve School Attendance' the DfE also updated other relevant guidance documents including, the Suspension and Permanent Exclusions Guidance.

This guidance sits under Section 19 of the Education Act 1996, which places a duty on Local Authorities (LA) to 'Make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive a suitable education unless such arrangements are made for them.' This applies to all such children who are resident in the area, whether they are on the roll of a school, and whatever type of school they attend.

All local authorities should have a written, publicly accessible policy statement on their arrangements for complying with the Section 19 duty. The Council has arrangements and process in place for delivering Section 19 duty, but these arrangements are not currently included in a Cabinet approved policy. This policy will, therefore:

provide clarity regarding roles and responsibilities of schools, the Council and other agencies (including financial).

ensure that all children and young people (CYP) have access to a suitable, full-time education which meets their individual needs to enable them to thrive and fulfil their ambitions and aspirations.

EQUALITY IMPACT ASSESSMENT (EIA)

ensure, when a child of compulsory school age is unable to access their educational setting due to illness, exclusion or otherwise, the Council complies with its duty under section 19 of the Education Act 1996 to ensure suitable provision for them.

1.3 List organisations and people who are involved in this area of work

The main stakeholders are:

- Children and young people (CYP)
- Parents/carers of statutory school age children and young people
- Schools
- Local Authority – Education, SEND, wider Children’s Services
- InspirED Pathways
- Alternative Provision Providers
- Health Partners

For the above question, please consider:

- Who is directly impacted by this decision
- Who is indirectly impacted...?
- Who is potentially impacted...?
- Whose help is needed to make the decision work?
- Who knows about the subject?
- Who will have an interest in the subject?

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

Implementation of the policy and the findings of the EIA is the responsibility of the Strategic Lead for Education

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

To find out more about local data, please visit the below links:

[Facts about Coventry](#)
[Census 2021](#)

EQUALITY IMPACT ASSESSMENT (EIA)

[Joint Strategic Needs Assessment \(JSNA\)](#)

2.1 Baseline data and information

Please include a summary of data analysis below, using both your own service level management information and also drawing comparisons with local data where necessary. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA.

The policy sets out the Council’s approach to meeting the needs of children of compulsory school age for whom it has a legal responsibility to provide an education, but who for reasons relating to illness, exclusion from school or other reasons experience barriers to accessing a full and suitable education offer.

This policy only relates to children and young people of statutory school age, i.e. children in the reception through to the end of Year 11.

The following provides information on the demographics of the pupil population and this cohort where information is available.

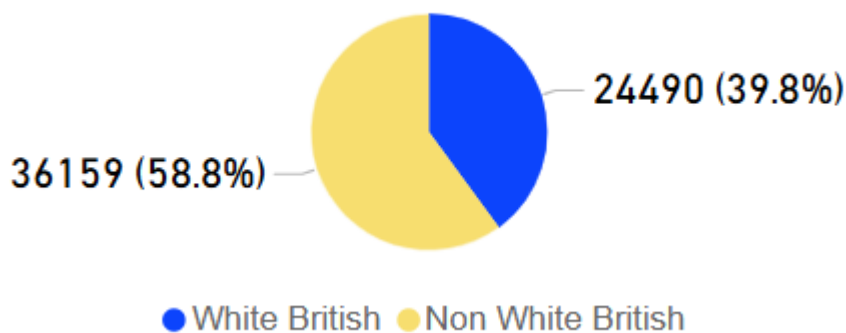
The January 2024 school census shows 34,056 children were enrolled in primary schools, 25,278 in secondary schools and 1,259 in special schools. Of those, 51% were male and 49% were female, 0% did not identify as male or female.

3.8% of this population had an EHC Plan and 16.7% were in receipt of school support for special educational needs.

The January 24 census shows 28.7% of this population were entitled to free school meals.

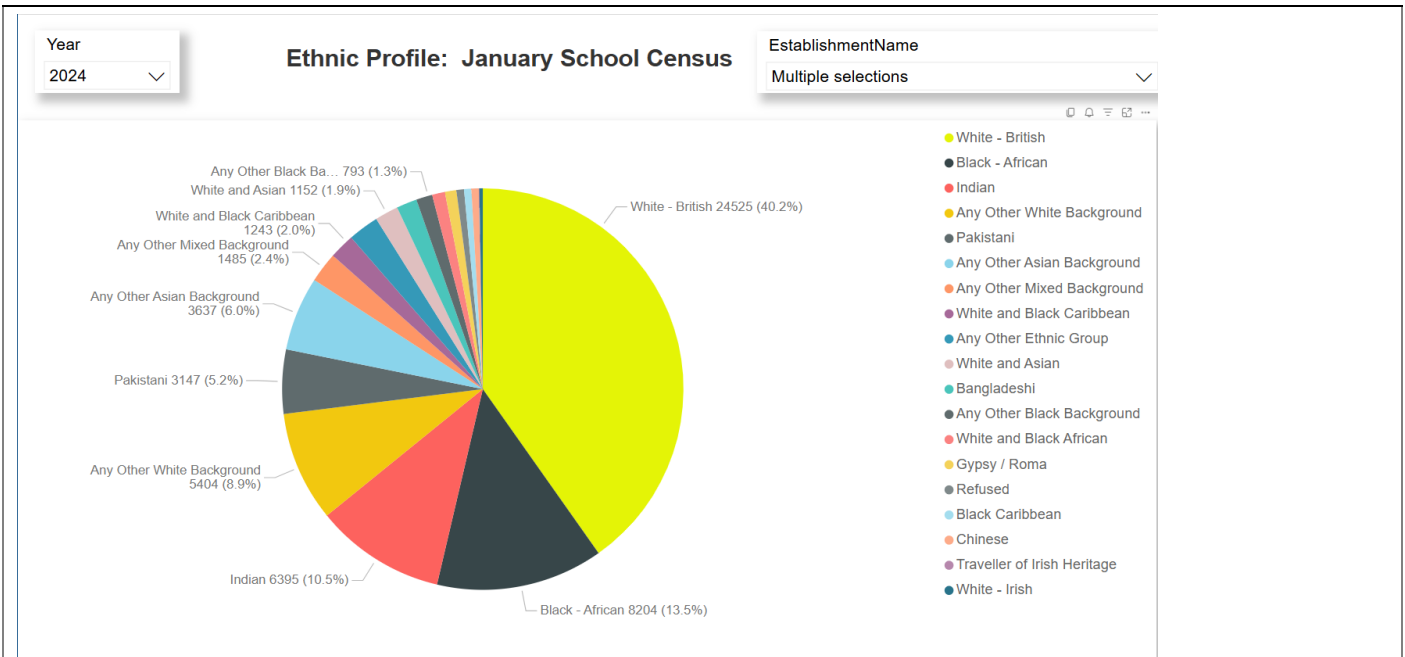
The composition of the population by ethnicity was as follows:

Ethnic Origin Summary (% White British)



Further broken down as follows:

EQUALITY IMPACT ASSESSMENT (EIA)



Children not attending school due to exclusion – we have the most information on this area. Information on exclusions is also collated by the DfE and published.

In the 23/24 academic year there were 117 permanent exclusions in Coventry. 31 were from primary schools, 84 from secondary schools and 2 from special schools.

Of those children who were excluded, 76% were male and 24% were female, 0% did not identify as male or female.

7.7% of children excluded had an EHC Plan and 52% were in receipt of school support for special educational needs.

60% of the children excluded had entitlement to free school meals, and 64% were in receipt of pupil premium.

The composition of children excluded by ethnicity was as follows:

Permanent Exclusions 2023/24

Ethnicity	Number of Students
BAFR - Black African	15
WEEU - White Eastern Euro'n	Less than 10
AIND - Indian	Less than 10
BCRB - Black Caribbean	Less than 10
MWAS - White and Asian	Less than 10
REFU - Refused	Less than 10
WBRI - White British	62
AOTH - Any Oth Asian b'ground	Less than 10
MOTH - Any Oth Mixed b'ground	Less than 10
APKN - Pakistani	Less than 10

EQUALITY IMPACT ASSESSMENT (EIA)

WOTH - Any Oth White b'ground	Less than 10
MWBA - White and Black African	Less than 10
BOTH - Any Oth Black b'ground	Less than 10
ABAN - Bangladeshi	Less than 10
WENG - White English	Less than 10
BNGN - Black Nigerian	Less than 10
NOBT - Info not yet obtained	Less than 10
WROR - Roma	Less than 10
OOth - Any other Ethnic Group	Less than 10
MWBC - White & Black Caribbean	Less than 10
Total	117

Data source: Capita One

Data as at 21/02/2025

Children not attending school due to ill health

Children who are unable to attend school due to ill health are discussed at a panel meeting convened by the Council.

Between September 23 and February 25 on average the panel received 15 referrals per month, and approximately 4 young people per month have received support from InspirED Pathways.

On 21/02/2025, a total of 74 children and young people were in receipt of education through InspirED pathways either as their main school or subsidiary school. Please note that only 2 of these are under section 19 duty.

In the current academic year a further 23 children and young people were brought to the attention of the Local Authority as potentially requiring provision under Section 19. As of February, one has been identifying as meeting criteria for Section 19 and a further three cases are in the process of being decided.

Moving forward demographic data relating to the cohort will be collected and reviewed by the Panel.

SECTION 3 – Protected Groups

3.1 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)

Protected Characteristic	Impact type P, N, PN, NI, UI	Nature of impact and any mitigations required
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EQUALITY IMPACT ASSESSMENT (EIA)

Age 0-18	P	<p>The exercise covers statutory school age within this age group. This is from age 5 in reception until the end of Year 11 (age 16). This policy is applied universally to this age group but it will only be relevant in certain circumstances.</p> <p>There are arrangements and process in relation to section 19 duty already in place but the introduction of a policy will provide greater clarity for all stakeholders.</p>
Age 19-64	P	The policy could have a positive impact for parents and guardians because it supports children and young people.
Age 65+	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented.
Disability	P	It is anticipated there will be positive impacts. If a child or young person has a disability that impacts upon their health and means they are unable to attend school for over and above 15 consecutive days this policy will support the provision of education.
Gender reassignment	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented.
Marriage and Civil Partnership	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented.
Pregnancy and maternity	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented.
Race (Including: colour, nationality, citizenship ethnic or national origins)	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented. Specific work streams around behaviour and exclusions (which is one part of the policy) will monitor data and demographics and consider specific work in relation to disproportionality.
Religion and belief	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented
Sex	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented. Specific work streams around behaviour and exclusions (which is one part of the policy) will monitor data and demographics and consider specific work in relation to disproportionality.
Sexual orientation	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented
Care Experienced	NI	It is anticipated that there will be no impacts on individuals with this protected characteristic if this policy is implemented. The Virtual School headteacher is in charge of promoting the educational achievement of all the children looked after by the Local Authority. This has been widened (non-statutory) to include children with a social worker including those in kinship care. The Virtual School would be involved for any children and young people in our care.

SECTION 4 – Health Inequalities

Consideration of impact - Health inequalities

4.1 Please tell us how the proposal you are submitting this EIA form will reduce health inequalities:

Please include which Marmot Principles this work covers.

Give every child the best start in life

EQUALITY IMPACT ASSESSMENT (EIA)

Enable all individuals to maximise their capabilities and have control over their lives
Create and develop healthy and sustainable places and communities

4.2 What information do you have to show you are going to reduce health inequalities?

Research undertaken in the UK over the past decade has found that extended non-attendance has a negative impact on children, young people and families and sustains health inequalities, across the areas of education and skills, income and employment, disability and gender and ethnicity. A clear policy and approach that supports re-integration, improved attendance, and sets out the Council's approach to meeting the needs of children of compulsory school age for whom Section 19 duty applies will support the reduction of health inequalities.

4.3 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?

Children who do not have access to education of some form will, by definition, be less able to develop their skills and reach their potential.

The impact of extended non-attendance on families can be significant, with parents sometimes needing to take time off paid employment to support their children during period of absence from school.

Extended non-attendance disproportionately affects children and young people with Special Educational Needs and Disabilities and can be associated with mental ill health.

Whilst deeper analysis of demographic data is needed, we are aware that some groups are disproportionately represented amongst the cohort of children with low attendance at school.

Finally, children with FSM entitlement and / or in receipt of pupil premium are over represented in the exclusions data.

Work to support re-integration and improved attendance alongside clarity in relation to Section 19 duty, and a panel to oversee referrals will help to improve health inequality for the groups identified.

4.4 What can be done to improve health equity for the groups of people you have identified?

Continued work to support re-integration and improved education attendance alongside Implementation of policy and process.

The overarching aim of the policy is to provide education to children and young people who are not able to access school for reasons of exclusion or poor health. In addressing this aim, the policy will reduce health inequalities for those groups who are most affected by the issue of non-attendance; including those with special educational needs, disabilities and mental ill health.

The policy will also reduce the negative consequences of non-attendance on the development of education and skills for CYP and on income and access to work for families.

Finally, the policy will reduce inequalities for marginalised groups, such as CYP who have been excluded from school, by providing a pathway back into education.

SECTION 5 – Digital Inequalities

The Covid-19 pandemic accelerated the uptake of digital services nationally, whereby people who are digitally enabled have better financial opportunities, can access new information and are better connected to others (Lloyds Consumer

EQUALITY IMPACT ASSESSMENT (EIA)

Digital Index, 2021). However, for those who are digitally excluded, the digital divide has grown during the last two years, and without intervention people will be left behind with poorer outcomes across employment, health and wellbeing, education and service access. Some people are more likely to be excluded including: older people, people from lower income households, unemployed people, people living in social housing, disabled people, school leavers before 16 with fewer educational qualifications, those living in rural areas, homeless people, or people who's first language is not English. ([NHS Digital](#))

If you need assistance in completing this section, please contact: [Laura Waller](#) (Digital Services & Inclusion Lead). More details and worked examples can be found on the [intranet](#).

5.1 Thinking of the main aims of your work area that this EIA is for; does your work area impact digital inequalities or exacerbate them?

Does your work assume service users have digital access and skills? Do outcomes vary across groups, for example digitally excluded people benefit the least compared to those who have digital skills and access? Consider what the unintended consequences of your work might be.

Schools will work alongside parents in relation to this policy. Notifications and referrals for exclusions or pupils with health needs will come from schools.

5.2 Where are the opportunities for your area to reduce digital exclusion inequalities and embed supports/interventions as part of your work?

If any digital inequalities are identified, how can you reduce these? For e.g. if a new service requires online registration you may work with partner organisations to improve digital skills and ensure equitable processes are available if someone is unable to access online.

NA

SECTION 6 – Next steps

6.1	Action Planning		
Inequality/Protected Characteristic	Planned Action	Owner	Timescale

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

Demographic information for CYP who come to the extended non-attendance panel and /or are accessed as requiring provision under Section 19 will be gathered and analysed by the Education Leadership team. This will feed into future policy review and update as required.

SECTION 7 – Impact on Council Staff

7.1 Will this area of work potentially have an impact on Council staff? No

SECTION 8 – Completion Statement

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

EQUALITY IMPACT ASSESSMENT (EIA)

- 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
- The potential impact of this proposal on protected groups is not yet known

Before you submit this form - please save your progress and forward the email you receive with any questions to equality@coventry.gov.uk. The team will review your Equality Impact Assessment and provide you with feedback.

Only click submit if the Equality Impact Assessment has been reviewed and you have been advised to by the equality team.

7.0 Approval

Name of Head of Service: Rachael Sugars, Strategic Lead - Education	Date approved by Head of Service: 24/02/25
Name of Director: Sukriti Sen	Date sent to Director: 24/02/25
Name of Lead Elected Member: Cllr Kindy Sandhu	Date sent to Councillor: 24/02/25

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Cabinet

18 March 2025

Name of Cabinet Member:

Cabinet Member for Education and Skills – Councillor Dr K Sandhu

Director Approving Submission of the report:

Director of Children and Education Services

Ward(s) affected:

All

Title:

Holiday Activities and Food Programme 2025: Acceptance of Grant

Is this a key decision?

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

Executive Summary:

The Government's Holiday Activities and Food programme (HAF) is an enrichment programme for disadvantaged children which includes the provision of healthy food. The programme is primarily for pupils of statutory school age, who are eligible for benefits-related free school meals. The programme has been funded from 2021/22 through to 2024/25 and operates through the Easter, Summer and Christmas school holidays. The delivery details were set out in the Cabinet report of 9 March 2021, the Council report of 16 March 2021 and the Cabinet reports of 15 March 2022, 14 March 2023 and 12 March 2024.

The Government have made a commitment for this next phase of the programme through to the end of March 2026. Coventry is receiving an allocation of £1,604,150 for the financial year 2025/26 (compared to an allocation of £1,587,840 for the financial year 2024/25), subject to meeting the conditions of the grant determination letter. This report sets out the intended approach for delivering HAF in 2025/26 and reports on 2024/25 activity.

Recommendations:

Cabinet is recommended to:

- 1) Approve the acceptance of the Department for Education HAF grant allocation, of up to £1,604,150 for the 2025/26 financial year.
- 2) Delegate authority for decisions about the planning and delivery of the HAF to the Director of Children and Education Services, following consultation with the Cabinet Member for Education and Skills including but not limited to:-
 - a) co-ordinating and awarding monies to relevant organisations in order to ensure the delivery of the programme to a high standard; and
 - b) acceptance of any future opportunities for additional in-year grant funding up to a total amount of £2.5 million pounds, in 2025/26.

List of Appendices included:

Appendix 1: Summary of Coventry Holiday Activities and Food programme 2024 delivery

Background papers:

Section 31 Grant Determination Letter for the Holiday Activities and Food Programme 2025/26: No 31/7645

Other useful documents

A video capturing the HAF summer 2024 programme has been produced – please see the link <https://vimeo.com/1028618184/2447db9978>

Coventry HAF webpages: <https://www.coventry.gov.uk/haf>

Cabinet report of 9 March 2021: [Report](#)

Council report of 16 March 2021 - Holiday Activities and Food Programme 2021: Acceptance of Grant and Proposed Distribution: [Report](#)

Cabinet report of 15 March 2022 - Holiday Activities and Food Programme 2022: Acceptance of Grant and Proposed Distribution: [Report](#)

Cabinet report of 14 March 2023 - Holiday Activities and Food Programme 2023: Acceptance of Grant: [Report](#)

Cabinet report of 14 March 2024 - Holiday Activities and Food Programme 2024: Acceptance of Grant: [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

Will this report go to Council?

No

Report title: Holiday Activities and Food Programme 2025: Acceptance of grant

1. Context (or background)

- 1.1 Following the success of the national Holiday Activities and Food Programme (HAF) during the financial year 2021/22, the Government announced the extension of the programme to March 2025. The Government has subsequently announced an extension of the programme to March 2026. Details of the programme remain as set out in the Cabinet report of 9 March 2021, the Council report of 16 March 2021 and the Cabinet reports of 14 March 2022, 14 March 2023 and 14 March 2024.
- 1.2 The programme will continue to target statutory school age pupils (reception to year 11 inclusive), who are eligible for benefits-related free school meals. Coventry has also included the following children in our eligibility criteria: assessed as a “child in need”, on a child protection plan, a child in care, a young carer, assessed (through an early help assessment) to be in financial hardship, children included in the Ukrainian Family Scheme or the Home for Ukraine programme and children receiving benefits-related free school meals through having no recourse to public funds. Children and young people in Years 12 - 13 are eligible if they are in receipt of benefits-related free school meals (FSM) and either have an Education Health and Care Plan or are receiving Special Educational Needs (SEN) support at their place of education. This means that approximately 18,000 Coventry children will be entitled to access free enrichment activities and healthy food during the Easter, Summer and Christmas school holidays of the 2025/26 financial year.
- 1.3 Coventry has been awarded an allocation of £1,604,150 for 2025/26. The programme allows for 15% discretionary spend on children who are not within the category of benefits-related free school meals (as noted above).
- 1.4 The grant determination letter states that all provision funded by the local authority through the HAF programme must meet the framework of standards and the following core aims and objectives:
 - **Healthy meals:** holiday clubs must provide at least one healthy meal a day which must meet the School Food Standards.
 - **Enrichment activities:** holiday clubs must provide fun and enriching activities that provide children with opportunities to develop or consolidate skills or knowledge. Clubs must also provide physical activities which meet the Physical Activity Guidelines on a daily basis.
 - **Increasing understanding and awareness of healthy eating:** holiday clubs must work to improve children’s knowledge and awareness of healthy eating.
 - **Signposting and referrals:** clubs must be able to provide information, signposting or referrals to other services and support that would benefit the children who attend their provision and their families. This can include advice on how to source, prepare and cook nutritious and low-cost food alongside increasing awareness of healthy eating.
 - **Policies and procedures:** clubs must be able to demonstrate and explain their safeguarding arrangements and have relevant and appropriate policies and procedures in place in relation to safeguarding, health and safety,

insurance, accessibility and inclusiveness. Where appropriate, clubs must also be compliant with the Ofsted requirements for working with children.

- 1.5 Local Authorities are encouraged to work with a wide range of providers in the delivery of the programme, recognising the important role that community and voluntary organisations have played in its success so far.
- 1.6 Attendance on the programme is voluntary. Each eligible school-age child is entitled to access the provision for one week during the Easter and Christmas holiday period and four weeks during the summer. A typical HAF week is defined as being a total of four, four hourly sessions per week.
- 1.7 Coventry City Council can evidence the success and positive impact of its programme delivery during the 2024/25 financial year, as set out in Appendix 1: Summary of Coventry Holiday Activities and Food programme 2024 delivery.
- 1.8 A video capturing the HAF summer 2024 programme has been produced – please see the link <https://vimeo.com/1028618184/2447db9978>

2. Options considered and recommended proposal

Decline the Award of the Grant Funding

- 2.1 This is not a viable option as all local authorities are expected to participate in the national programme. This is not the recommended option.

Acceptance of the Grant Funding

- 2.2 The City Council accept the grant and continue to co-ordinate the programme. Funding would continue to be awarded via the grant agreement to organisations who are able to deliver the required specification of provision, building on the existing local partnership. This is the recommended option.

3. Results of consultation undertaken

- 3.1 No consultation is required or necessary for the programme. There is strong engagement and collaboration with a wide range of partners across Coventry and there has been significant feedback from families that influences programme delivery.

4. Timetable for implementing this decision

- 4.1 The acceptance of grant monies will be implemented immediately, and plans are already in place for delivery for the Easter 2025 holidays, building on the foundation of 2024 delivery.

5. Comments from the Director of Finance and Resources (Section 151 Officer) and the Director of Law and Governance

5.1 Financial implications

The indicative maximum allocation available is £1,604,150 for 2025/26 financial year (a slightly increased level compared to financial year 2024/25). The payments will be made by the DfE at various milestones throughout the year including receipt of delivery plans and reports back on actual activity and expenditure.

The funding is for the provision of free holiday club places (90% of the funding) in the Easter, Summer and Christmas holidays, and for Local Authority coordination costs (10% of the funding). A small team supports the delivery of the programme within the allowed 10% of the grant allocation.

The Council's nominated responsible officer must confirm, through the submission of an annual certificate of expenditure, at the end of each financial year that the funding has been properly expended.

There is a small risk that funds could be withheld if the programme is not delivered appropriately. However, this risk is mitigated because Coventry's delivery plans are based on the scheme guidance and robust risk management arrangements are in place (see section 6.2).

An annual report must be submitted, and this must include:

- the overall number of unique children who participated in programme
- the overall number of unique children in receipt of Free School Meals who participated in the programme
- the number and proportion of children who are in the: primary school age range, the secondary school age range and any children outside of those age ranges who attended the programme
- the number of children with SEND or additional needs who have participated in the programme.

5.2 Legal implications

5.2.1 The Council has no specific statutory duty to deliver holiday-based food and activity for families.

5.2.2 By section 31(3) and 31(4) of the Local Government Act 2003 (Power to pay grant) the Department for Education has made grant provision available to enable local authorities to provide to school age children who are eligible for free school meals, healthy meals and enrichment activities during the Easter, Summer and Christmas holiday periods free of charge. The Grant Determination sets out the conditions upon which the grant has been made available and to which the local authority must comply.

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

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>

This programme aligns with the One Coventry Plan, and can contribute towards the following aims:

- Improving educational outcomes by working with schools to continue to improve standards and skills, and
- Improving health and wellbeing by supporting children and young people to lead healthier lifestyles including better mental health; keeping children and young people safe from harm by providing activities; providing early intervention for families who need it; enabling people to exercise choice and control in their daily lives; reducing health inequalities and giving our children the best start in life.

6.2 How is risk being managed?

A robust risk management approach is in place for the programme.

To ensure that participating children and young people are safeguarded, only holiday provision meeting quality standards is grant funded. Organisations funded by HAF have developed a strong track record of working positively with children, families and schools across Coventry building a positive reputation based on trust. Checks are in place to ensure that staff have appropriate qualifications, and that employment and safe recruitment checks are in place (e.g. DBS).

The grant monies awarded are not sufficient to fully support all eligible children and young people in the city with the provision of food throughout the holidays. In order to manage this expectation, the scope of the HAF programme is clearly communicated to parents and carers.

The HAF steering group has established a risk and issue management approach. If a risk exceeds the threshold of tolerance and threatens the delivery of the project or signals a significant change of approach is required, it is escalated to the HAF steering group for consideration and options for mitigation/response determined. Risks and issues of a lower impact are mitigated and responded to within the day-to-day activity of the project team and are recorded in the project risk log.

6.3 What is the impact on the organisation?

The programme is co-ordinated by a small team within Children and Education Services.

6.4 Equality Impact Assessment (EIA)

As an intrinsic part of the programme, consideration is given to ensuring provision is accessible and engaging for all eligible children and young people (including those with a special educational need and disability, and older children). The programme has due regard to the requirements of the Equality Act in both the coordination and

delivery of the programme. A detailed assessment and analysis of equality impacts of the programme will be conducted in the Spring of 2025 looking back to programme delivery in 2024/25. This will be built into the evaluation of the programme in 2025 and will also contribute to the case for further HAF funding.

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

None

6.6 Implications for partner organisations?

The Council will continue to work with a wide range of partner organisations in the delivery of this programme, ensuring partners are proportionately represented on the HAF steering group to oversee the implementation. In forming the HAF steering group, the Council has taken full account of the DfE recommendations on composition by including the following partners: local police and other uniform services; public health; school leaders; youth services; social services; charities and the voluntary sector. Membership of the steering groups is reviewed annually.

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Sukriti Sen	Director of Children and Education Services	Children and Education Services	17/02/25	20/2/25
Councillor Dr K Sandhu	Cabinet Member for Education and Skills	-	14/02/25	17/02/25

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

Appendix 1 – Summary of Holiday Activities and Food 2024 delivery

Purpose

The primary purpose of this Cabinet report relates to acceptance of the HAF grant. This appendix provides a summary of 2024 delivery. A video capturing the HAF summer 2024 programme has been produced – please see the link:

<https://vimeo.com/1028618184/2447db9978>

Principles

The HAF multi-agency steering group agreed the following principles when the Coventry HAF programme was established in Coventry, linking with the DfE objectives. These are:

- Positive, memorable and happy holiday experiences that demonstrate the value of every person
- Impacts that last beyond the holidays and experiences that reach parents and families through children and young people
- Building on, and enabling, trusted relationships and Coventry strengths
- Collaboration and partnership across a wide range of organisations and engaging with children, young people and families throughout
- Joined-up locality offer - particularly in areas of higher deprivation
- Tailored approaches for primary and secondary ages with a key focus on children with Special Educational Needs and Disabilities
- Joining-up with school summer and education recovery programmes
- Continuous learning and improvement, including learning across Coventry, West Midlands and nationally
- Coventry HAF as a part of a joined-up offer for Coventry lower-income families

2024 delivery overview

Coventry's 2024 delivery has built on the foundations of previous years and continues to deliver an effective Holiday Activities and Food programme. HAF delivers a comprehensive and diverse range of holiday activities, experiences and clubs, to lower-income families in Coventry. The offer is more focussed in areas that have higher numbers of HAF-eligible children and young people. Below is a summary of 2024 delivery.

Participation

The 2024 school summer holiday programme was the most recent and most successful Coventry HAF holiday programme delivered. The following key statistics from the summer programme illustrate this

- c.4,200 eligible children and young people benefitted (including c.1,400 children with SEND) plus thousands of other family members;
- c.22,500 meals were provided;
- c.22,500 sessions were delivered (an increase of 26% compared to summer 2023);
- 120 different activities/clubs were delivered;
- 43 providers were directly funded, with a further 50 sub- providers/partner organisations;
- 87% of funded places provided, were attended (up from 78% in summer 2023); and
- Families gave a 4.4/5-star feedback rating on the activities.

Other key highlights from our Summer 2024 programme included:

- Use of a wide range of venues and locations including 20 primary schools, 8 secondary schools, 5 special schools, 1 university, 12 community centres, 10 leisure centres/sports facilities, 7 arts venues, 3 parks, 15 other locations/venues
- An increase in the diversity of activities in line with our principle of “something for everyone” with the inclusion of plumbing skills, trauma therapy etc.
- Stronger partnership working with family hubs including family cooking sessions, and a SEND-specific activity bus at Families for All, Park Edge and Moat House Family Hubs;
- Improvements in the quality of food provided through partnership working and the support of our HAF Project Support Officer food nutritionist. Family feedback on our food offer was 4/5-star feedback rating;
- Holy Family Larks and Owls Club (One of our Coventry HAF providers) won Best HAF Provision in the Club Central Out-of-School Club Awards 2024; and
- Development of the skills offer for children and young people (e.g. plumbing skills).

Focus on inclusion and activities for children with additional needs

Coventry HAF has a strong focus on inclusion and on children with Special Educational Needs and Disabilities (SEND). Approximately one third of those who participate in the programme have additional needs. This has been achieved in the following ways:

- Training and up-skilling of HAF providers;
- Communication with parents/carers and providers - ensuring the specific needs of individual children are shared through an “All about me” focus;
- Additional funding for providers for staffing to increase ratios;
- SEND family experiences – benefitting 382 families with 8 different experience providers (in summer 2024); and
- SEND special school initiative – funded by Coventry Building Society for a second summer and working with 5 of our Coventry Special Schools – benefitting 128 eligible children plus family members (in summer 2024).

Quality

Providers are assessed according to a range of standards including their activities, provision of healthy food, nutritional education, safeguarding, health and safety, and information shared with families. This assessment is both prior to awarding grant funding and post-delivery (based on delivery performance, visits, feedback from parents/carers and children). A quality framework has been developed focussing on the following key elements through our “HAFF” quality framework. Every provider/activity is assessed against the following:

- **Hospitable** - safe and have an inclusive, friendly and welcoming environment
- **Activities** - enriching, engaging, developmental and diverse
- **Food** – provision of nutritional food, nutritional education for children and families
- **Families** - activities signpost and engage families with support (e.g. cost of living information).

Promotion

There was significant promotion of the summer programme through provider and programme marketing including: brochures and letters to eligible households, promotion through schools, social media, texts, promo-videos and other means.

Impact

There are an increasing number of stories and examples of the impact that clubs, activities and experiences have made on children and young people in terms of confidence and reduced levels of anxiety. Children and young people report that they have made new friends and tried things they would never have had the opportunity to do before. When they return to school from a school holiday, they are able to share with their peers and teachers the positive activities they have participated in. They receive healthy meals and some children cook and eat food that they may not have tried before and learn new skills. Providers report that many children and young people now continue to engage with their weekly activities as a result of an initial engagement through HAF.

One Coventry HAF Partnership approach

Providers see themselves as part of a One Coventry HAF Partnership where they can collaborate and share ideas. Providers are not only implementing new ideas but are developing new relationships with each other. The HAF programme hosts a provider celebration event, bringing together all the providers following each holiday programme. This creates a context for providers to meet with others and share ideas that they can embed into their own delivery.

Food

Hot nutritional meals are provided at many activities (trips may be an exception to this) and breakfast is provided by some clubs that start earlier – both as an important meal to start a day, and as settling in time. Nutritional education takes place in all clubs and there is the opportunity at some clubs for the children to participate in cooking meals. Family cooking sessions are delivered by some providers who have bought a standard set of cooking equipment that they can use with families.

Feedback from parents/carers

There has been extensive feedback from parents/carers, children and young people on the programme. For example, following our summer programme, families gave a 4.4 out of 5-star feedback rating on activities.

Coventry has also received positive feedback on its programme from Childcare Works who are working with the DfE on the national HAF programme. Coventry HAF has been represented in a HAF evaluation being undertaken by the universities of Birmingham and Bristol. This includes hearing the feedback from children about HAF.

Partnerships

HAF providers within the overall programme have developed individual partnerships with a range of companies and organisations. In addition, across the HAF programme there is partnership with the Coventry Building Society (£50k investment in 2024/25) and with Stellantis (a global car company with UK headquarters in Coventry). Stellantis staff were involved in volunteering to pack and deliver home activity boxes in the Christmas school holidays for children who were unable to access face-to-face HAF provision.

Maximising attendance

The percentage of those booking and actual attendance has increased in 2024 – for example in the summer attendance increased from 87% of funded places attended (up from 78% in summer 2023). This has been through the implementation of the following actions to mitigate against parents/carers booking children onto activities and not attending. These have included:

- Setting the bookable capacity of an activity to be higher (e.g. 125%, based on an expected 25% no-show);
- Being clear in all communications with parents/carers of the impact on other Coventry children if their own child is booked on and does not attend;
- Providers contacting parents/carers prior to activities in a positive way to remind them of the sessions (including phone calls, texts, messages, emails, social media etc.);
- Providers contacting parents/carers who have booked on an activity but not attended;
- Where 3 attempts have been made to contact a family, following a “no-show”, the booking being cancelled; and
- A stronger relational aspect (e.g. consultation with the children and young people on activities delivered, building on existing relationships with the school or organisation delivering the activities).

Areas of focus for Coventry HAF in 2025

The key areas of development and focus for 2025 include:

- Further development of our offer to children and young people with additional needs;
- Further development of our secondary school and skills-based offer in partnership with secondary schools, the Coventry Youth Partnership, Coventry and Warwick universities and others;
- A continued increase in attendance at HAF activities; and
- Continuing to build the case for continued funding for HAF post-2026 through recording and analysing the impact of HAF.

Additional information

The following providers were directly funded in 2024 (there other providers/organisations who were also involved, but not directly funded):

Aptitude, Arts a Riot, Ascension Dance Company, Baginton Fields School, Barr's Hill School, Cardinal Newman Catholic School, Canley Community Centre, Coventry Boys and Girls Club, Coventry Music, Coventry Outdoors, Coventry Rugby, Coventry SDA, Cre8fun, Creative Optimistic Visions, CV Life/Culture Coventry, Edgewick Primary, Empow- U/Energ!se, Epic Academy/SCCU, Feeding Coventry, Guardian Ballers, Guiding Young Minds, Highly Sprung, Holbrooks Community Care Association, Holy Family Primary School (Larks and Owls club), Jam Coding, Kingsbury Academy, My Activities, Onside Coaching Plumb Learning, Project Number 5, Razzamataz Theatre Schools, Rising Stars, Riverbank School, SDH Academy, Sport Works, Sprint Active Education, Sky Blues in the Community, Staffordshire Winter Sports Club (Planet Ice), Tiverton School, Tribe: Cheer, Dance and Fitness, University of Warwick Holiday Scheme, Vanny Radio, WATCH/Hillz FM, and Woodfield School.

Activities took place in the following locations in 2024:

Activities took place in the following locations:

- **Primary schools:** Aldermans Green, Allesley Hall, Charter, Edgewick, Frederick Bird, Gosford Park, Grangehurst, Henley Green, Holy Family, John Gulson, Keresley Grange, Leigh C of E, Manor Park, Our Lady, Ravensdale, Sidney Stringer Primary, Stoke Heath, Stretton, Southfields, Walsgrave C of E
- **Secondary schools:** Barrs Hill, Cardinal Newman, Cardinal Wiseman, Finham Park 2, Grace Academy, Lyng Hall, President Kennedy, Sidney Stringer
- **Special schools:** Bagington Fields, Kingsbury, Riverbank, Tiverton, Woodfield
- **Community Centres/facilities:** Bethel Church, Broad Horizon Enterprise Centre, Canley Community Centre, Coventry Boys and Girls Club, Coventry Central SDA church, Eastern Green Village Hall, Foleshill Community Centre, Holbrooks Community Centre, Holbrooks Community Care Association, Stoke Park Youth Centre, The Crez (Jubilee Crescent Community Centre), WATCH
- **Leisure Centres/sports Facilities:** The Wave, Alan Higgs, AT7 Centre, Coventry Rugby (Butts Park Arena), Moat House Neighbourhood and Leisure Centre, Planet Ice, XCEL Leisure Centre, Coombe Abbey Go-Ape! Tamworth Snowdome, Warwickshire Shopping Park (Tribe RLS Elite – Dance)
- **Arts:** The Albany Theatre, Coventry Transport Museum, Daimler Powerhouse, FarGo, Herbert Art Gallery and Museum, Lunt Roman Fort, Macready Theatre, Warwick Arts Centre
- **Parks:** Coombe Abbey Country Park, Edgewick Park, Gosford Green, Holbrooks Park
- **University:** University of Warwick
- **Other locations:** Aqualand, Ash End House Children's Farm, Aztec Adventure, Cadbury World, Cliff Lakes Aqua Park, Electric Wharf (Plumb Learning), Drayton Manor Theme Park, Hatton Farm/Adventure World, National Space Centre, Perkisound Recreational Centre, Sealife Centre, Red Kangaroo Trampoline Park, Skegness, Spencer's Retreat SEND Care Farm, Ten-pin bowling, Twycross Zoo, Western-Super-Mare, York Railway

A wide range of activities took place, including:

The following are examples of the types of activities included in the programme:

Animation, archery, art master classes (creative journaling, floral water-colours, illustration skills, oil painting, street art murals) Aqualand, Aztec adventure, BBQ, badminton, basketball, bouncy castles, breakfasts, broadcasting, bushcraft and survival, chef academy, cheerleading, choreography, coding, circus skills, climbing, combat archery, cooking, crafts (tie dye, quilling, origami, gemtastic jewellery and fabric), creative journaling, cricket, dancing, drama, drawing, DJ-ing, fitness, football, forest school, fun days, giant board games, go- karting, gadgets, gaming, gardening, gymnastics, horse riding lessons, ice-skating lessons, inflatable air track, inflatable bungee, karaoke, inflatable assault course, lacrosse, laser tag, lego building, lava lamp making, MicLab (sustainable stations, stop motion animation, stitch in time, connections and innovations), movies, movie making, multi-activity clubs (crafts, sports, arts etc.), music workshops, netball, ninja warrior, paintballing, performance (parkour, free running and contemporary dance), performing arts, photography, physical theatre, picnics, podcasting, plumbing lessons, pool, pottery, radio, rap, robotics, roller skating, rounders, rugby, singing, science, SEND sensory corner, skateboarding lessons, stable management, sports day, stop-motion animation, swimming lessons, team building, tennis, trampolining, tree-top

adventure, tug-of-war, The Wave, trips (Western Super Mare, Drayton Manor, Go-Ape, Hatton Park, Red Kangaroo, Cliff Lake Aqua Park, Tamworth Snowdome, Warwick Arts Centre, York Railway, Skegness, London, West Midlands Safari, National Space Centre, Lunt Roman Fort, Ash End Farm), ultimate frisbee, videography, water sports, water-colour/ink painting, zip wire and other activities.

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Cabinet

18th March, 2025

Name of Cabinet Member:

Cabinet Member for Children and Young People – Councillor P Seaman

Director Approving Submission of the report:

Director of Children and Education Services

Ward(s) affected:

All

Title:

Family Hub and Start for Life Programme

Is this a key decision?

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

Executive Summary:

The Council currently operates 8 Family Hubs to deliver place-based integrated offer to families across the City, including the offer from the buildings, through an outreach community model and a new digital offer.

Coventry City Council was selected as one of 75 Local Authorities to join the national Family Hub and Start for Life Programme commencing in 2022-2025 (first 1001 days), including financial investment to strengthen its offer to babies, children and families building on its previous achievements.

This Programme has already received £4.43m grant funding from the Department of Health and Social Care and the Department of Education across the 3 years 2022/23 to 2024/25 to deliver the Programme objectives. Coventry was also formally recognised as a trailblazer in this approach, one of only 13 sites across England, and has received many national ministerial and governmental visits and has contributed to national evaluations.

The Programme has been governed by a Family Hub Programme Board, supporting the work of 7 workstreams to ensure that all of the national minimum expectation, and most of the “go further”, of the framework are delivered within the Coventry Family hub offer, in line with the MOU associated with this grant. Regular updates have been provided to the

Cabinet Member for Children and Young People, the Health and Wellbeing Board and other Boards and Forums on request.

Further funding has now been allocated to Coventry for financial year 2025/26, with a provisional maximum allocation of £1,583,700, subject to the Council meeting the current Programme expectations up to March 2025 and the signing of a new Memorandum of Understanding to formalise the agreement to meet the new Programme expectations.

Recommendations:

Cabinet is recommended to:

1. Note the progress to date of the Family Hub and Start for Life Programme and Trailblazer Programme.
2. Accept the grant funding for the purposes outlined in this report in respect of the Family Hub and Start for Life Programme and the Trailblazer Programme, for the financial year 2025/26.
3. Delegate authority to Director of Children and Education Services, following consultation with the Director of Finance and Resources and the Director of Law and Governance to enter into the necessary legal agreement/s to accept the funding.
4. Continue to agree that future reports on this grant and the Family Hub and Start for Life Programme are received by the Cabinet Member with responsibility for Children Services.

List of Appendices included:

None

[Background papers: Family Hub and Start for life Cabinet report, October 2022](#)

None

Other useful documents

[HM Government : The Best Start for Life : A vision for the 1001 critical days](#)

[HM Government : Family Hubs and Start for Life Programme Guide](#)

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: Family Hub and Start for Life Programme

1. Context (or background)

- 1.1 Family Hubs are a place-based way of joining up services locally in the planning and delivery of family services. They bring together services to improve access, build connections between families, practitioners, services and providers and put relationships at the heart of family support. Family hubs offer universal and targeted support to families with children of all ages up to 19 years and should provide support to families with young people with SEND up to 25 years. A comprehensive and effective Start for Life offer (0-2 years) should be at the core of the offer.
- 1.2 Coventry has pioneered the development and delivery of a Family Hub offer since 2018, and there are currently 8 Family Hubs delivering services to children, young people and their families through place based integrated working by a range of services, with some outreach and an emerging digital offer.
- 1.3 Coventry has been influential in the development of national and regional policy and practice regarding the development and delivery of Family Hubs to deliver early help to children, young people and families through place-based integration of services and working with our communities and residents to ensure that their needs are met, and their strengths and assets are utilised to help others
- 1.4 At the 2024 Autumn Budget, HM Government announced an ongoing commitment and extension to the previous government's Family Hub and Start for Life Programme. This is part of the Government's ambition and commitment to give all children the best start in life by increasing spending on early years and families' services, including £69 million from the Department of Education to continue the delivery of a network of family hubs across England.
- 1.5 In addition, the Department of Health and Social care committed £57 million for Start for Life services to families with babies and infants in the first 1001 days (conception to second year of life).
- 1.6 The funding is to continue and expand the delivery of integrated family support for families with children of all ages, as well as the mandated Start for Life services (midwifery, health visiting, parent- infant relationships and mental health, breastfeeding, safeguarding, and SEND offer)
- 1.7 The funding must continue to be used to enhance the Family hub offer (building, outreach and digital offer) regarding perinatal mental health and parent-infant relationship support, infant feeding support services, evidence-based parenting Programmes, promoting nurturing positive home learning environments, and ensuring that parents' and carers' voices are heard in the design, delivery and evaluation of services through our Parent Voice network.
- 1.8 There are clear expectations regarding how the funding should be allocated to deliver the required funding services as indicated, although there will be a level of flexibility in the 2025/26 allocation across the work strands. The only exception to this flexibility is for capital spend, which should only be used on capital activities.

1.9 Table 1: Distribution of the funding allocation across the relevant Programme strands

Strand	*%	£000
Family hubs Programme	14.2	225
Family hubs capital	6.3	100
Perinatal mental health and parent-infant relationships	32.8	519
Parenting support	18.6	294
Infant feeding support	16.2	256
Home learning environment services	10.3	163
Publishing 'Start for Life' offers and Parent and Carer Panels	1.7	27
Total		1,584

*The distribution of funding has been rounded to one decimal place. The sum of percentages across strands may not total 100% due to this rounding.

- 1.10 The Family Hub Programme guide sets the minimum and “go further” expectations for 24 aspects of the offer (in the hub building, in the community and digitally) which includes the funded workstreams and the wider offer. Coventry reviews and self-assesses its maturity against these expectations and submits annual reports evidencing how these expectations are being met across the Family hub partnership offer.
- 1.11 As a trailblazer, Coventry has made outstanding process and demonstrated innovative practice in delivering the Family Hubs and Start for Life Programme. Funding has enabled the offer to progress faster and harder in delivering new or improved services in perinatal mental health and parent-infant relationships, and infant feeding, and in the overall offer.
- 1.12 Coventry co-chairs the Community of Practice for Family Hubs in the West Midlands, with colleagues from the Anna Freud Centre, and has provided ongoing support to both the funded and non-funded LAs in the region.
- 1.13 Coventry hosted a visit from Dame Andrea Leadsom in July 2023, we took part in a Parliamentary event in June 2024, to evidence our work, and most recently Justin Russell, Director General for DfE visited Coventry to see the work of the Family hubs.
- 1.14 Coventry has also taken part in national independent evaluations undertaken by Ecorys UK in partnership with Ipsos, Sheffield Hallam, University (SHU) commissioned by the Department for Education (DfE) and have published case studies on the work of supporting families feeding their infants in the national family hub Programme newsletter.
- 1.15 The key principles of the Family Hub Programme are Access, Connections and Relationships. These have been activated across all workstreams, and across the wider services in the current grant and will remain the focus for the forthcoming year under the new grant. Significant progress has been made to ensure that the Family

hub offer includes the support available in the 8 hub buildings, in a wide range of community settings and digitally.

2. Headlines of progress

- 2.1 Access : All families need support from time to time to help their babies and children thrive and the intention of the Family Hub and Start for Life Programme is that every family will receive the support when they need it and should have access to the information and guidance that they need to care for and interact positively with their babies and children and to look after their own wellbeing. Investing in supporting families to care for their babies, children and young people has an important role to play in reducing health and educational inequalities, and improving their longer-term physical, emotional, cognitive and social outcomes.
- 2.2 Timetables of support are available termly, and special events and activities in the holidays, and are widely promoted to help reach families of children aged 0-19 (and up to 25 with a SEND). Within the current funded Programme 104,604 individuals have attended 35,984 activity/intervention at a family hub building. 600 people attended a family hub during the two weeks in the Christmas period of 2024. A PBI dashboard is in place to capture and evidence the reach of the current offer and a recent analysis has identified the cohorts of families to target in the forthcoming year.
- 2.3 Families can now register the birth of their baby at 3 of the Family hubs, and more sites are planned for the forthcoming year. 554 babies have been registered by their parents who have taken up this offer as an alternative to attending the city centre Registrar office and have then been connected to the wider family hub offer at the start of their parenting journey.
- 2.4 In June 2024 Coventry launched the new digital “one stop shop” portal for all information, advice and support for families www.coventryfamilies.co.uk. There are currently over 7,000 users, with 78,000 page views of the partnership content. This portal uses Ai and automation to enhance the human experience of the Family hub offer and is a key enabler in ensuring the offer is available and accessible by all.
- 2.5 Connections: Over 50 local services (public and the voluntary, community and faith sector), are part of the Family hub network and work together in partnership *with* families, as part of the Family hub offer within the buildings and in the local communities. Family Hub community practitioners have been deployed to over 40 community spaces to deliver the Family offer in faith buildings, community centres, libraries, food hubs and social supermarkets, University Hospital wards, etc. taking a localised whole family approach enabling families to access the help where they need it.
- 2.6 It is essential that services continue to integrate and innovate in providing services to help families get the support they need, where they need it, building on the experience of good partnerships and new and flexible working practices, developed in the first 3 years of the Programme. Developing the community offer further will be a strategic priority for the new grant and funding period 2025/2026.
- 2.7 The outcomes and impact of the funded workstreams (Parenting, perinatal mental health, infant feeding, Playing and learning together, Start for Life and Parent Voice) have been monitored and evaluated quarterly by the family hub Programme Board

and data is submitted to the DfE. A comprehensive impact report will be published by the end of March, to celebrate and evidence the achievements to date and evidence the learning and best practice on which the next year's activities will be based upon.

- 2.8 There has also been redesign work undertaken in the Family hub buildings, utilizing the capital grant element of the overall grant which has enabled more delivery space to be created and improvements in the overall condition of the buildings. This work has been done in consultation with parents and young people to ensure the spaces are welcoming and reflect the local communities' identities.
- 2.9 Relationships: Evidence is clear that identifying risks early and preventing problems from escalating leads to better long term-outcomes. Universal services should therefore prioritise working within the Family Hub partnership offer and made available to all local families who need them to identify and respond to issues early before they develop into more complex problems. Currently our targeted early help support teams are co-located within the Family hub buildings and this enables our Family Hubs to be a key enabler in delivering early help to families in Coventry who need additional support, with clear and accessible pathways to access targeted service offer and to intensive family support, as part of the emerging family help model.
- 2.10 The practice throughout the family hub offer is relationship – centered and focuses on building trusting and supportive relationships, emphasising continuity of care in the Start for Life offer. It builds on families' strengths, drawing on and improving relationships, including building networks with peers to address underlying issues. Many families attend more than one hub building, multiple activities and receive support from several of the elements of the offer both physically and virtually.
- 2.11 7 films have been made to show the work of the Family hub offer, which can be used to reach and engage other families in the support available. These include the offer to young people, the work with fathers, feeding your baby and family, and parenting.
- 2.12 Priorities for Coventry in 2025/26 will include:
- developing further the community offer and strengthening the Family hub network offer, in particularly supporting “early help hubs” in schools, and reaching those not yet accessing services from our current Family Hubs
 - building on the work with fathers, which has currently focused on supporting fathers in the first 1001 days, to ensure all services are inclusive
 - optimising on the www.coventryfamilies.co.uk portal, utilising new technology of automation and Ai to enable the most effective and efficient offer can be made available to all families in Coventry
 - further embedding the voices of parents and carers to co-produce the Family Hub offer including a volunteering pathway and qualifications

- enhancing and expanding services which seek to identify and address needs for key vulnerable groups and those experiencing inequalities including children impacted by homelessness, families with children with SEND, families from the global majority, children not actively engaged in education and those living in poverty.
- Ongoing workforce capacity and capability through workforce models that incorporate skill mix, facilitating join-up of the multi-professional workforce to provide continuity of care to all families, improving multi-agency training, addressing existing skill gaps, and ensuring empathy is at the heart of practice
- understanding what works and sharing best practice through robustly evaluating the Family Hub Offer against a set of measurable quantitative and qualitative objectives and contributing to the regional and national evaluations

3. Options considered and recommended proposal

- 3.1 It is recommended that Coventry continues to receive funding from the Department for Education and Department for Health and Social Care to deliver its services in accordance with the national Family Hub and Start for Life Programme enabling the continued universal place based early help offer to children, young people and families.
- 3.2 A new delivery plan will be submitted by March 2025 that will demonstrate how the funding will be used to achieve the Programme objectives, which continues to be an integral component of the Early Help Strategy and the development of Family help.
- 3.3 Coventry commits to continued work with the National Centre for Family Hubs and Start for Life Unit to share learning and best practice, implement central government branding requirements and agrees to continue to take part in the national evaluation of Family Hubs and Start for Life.
- 3.4 Continued strategic commitment and support to the Programme from senior executives and leads across the Local Authority, the Integrated Care Board, elected members, and senior strategic leaders within the local services providers that are relevant to the Programme including the local health, education, and social care system, and the Voluntary and Community Sector.

4. Results of consultation undertaken

- 4.1 The establishment of a Parent Carer Panel is a statutory requirement of the Programme, and the Coventry Parent Voice Network is now an active network of over 350 parents providing feedback on the Start for Life and Family Hub offer to design, deliver and improve support and services. The Parent Voice Network has thoroughly gathered a comprehensive range of information and data to inform our services and enhance our services for families in Coventry. This process has involved extensive community engagement, structured surveys, and direct collaboration with the Department for Education.
- 4.2 One of the activities the parent network has led on has been undertaking biannual surveys with those accessing the family hubs and engaging with those who do not

through a range of outreach, community and online surveys.

- 4.3 98% of families reported high levels of satisfaction with the services and support provided by the Parent Voice Network. 80% of families stated that they feel more confident in their ability to navigate the support system and advocate for their needs. 95% of families expressed a strong sense of connection and belonging within the community, citing the Parent Voice Network as a key factor.
- 4.4 Nonusers' surveys have indicated where families may also go to seek help and advice, including schools, faith providers and other community assets. This insight has informed the development of the community outreach provision and the development of the Family hub network.

5. Timetable for implementing this decision

- 5.1 The new grant funding period will begin 1st April, 2025 following the submission of the new delivery plan in March 2025. Decisions regarding continuation, cessation or new activities funded by the current grant are currently being taken, informed by the evidence of the outcomes and impact of each Programme of work. The new Programme guide is anticipated to be made available by the end of February 2025, which will inform the continuation of current contracts and any commissioning of new projects.

6. Comments from Director of Finance and Resources and Director of Law and Governance

6.1 Financial Implications

- 6.1.1 The existing family hub model in Coventry is funded by a combination of core and grant funding, including the Supporting Families grant and contributions from Public Health. From 2025/26 Supporting Families will no longer be a separate grant and will instead form part of Coventry's Children and Families grant allocation.

- 6.1.2 Continuing to participate in the Family Hubs and Start for Life Programme will attract additional grant funding of £1,583,700 in 2025/26.

- 6.1.3 This grant is not intended to cover the operational costs of family hubs and start for life services. For family hub services that are not funded as part of the Programme (as described in the Programme guide), funding from existing funding sources will need to be continued.

- 6.1.4 It is expected that two grant returns will be required throughout 2025/26:

- An interim statement of grant usage (mid-year) that will provide detail on spend to date against each strand of the Programme
- A final statement of grant usage at the end of the financial year confirming actual spend by strand alongside confirming that expenditure was in line with the purposes specified in the grant determination letter

- 6.1.5 A full and detailed project budget will be drawn up as part of the delivery plan, against which project spend will be monitored. All required spend will be funded through the

grant awarded and no match funding will be required.

- 6.1.6 Careful consideration will need to be given to the action to be taken at the end of the grant regime, as this is time limited funding. If the grant ceases, then activity and provision will need to reduce back to levels that can be met within the existing budget envelope. However, an extension of the original three-year funding agreement by this additional year provides more opportunities to embed best practice into the existing family hub offer and into service delivery across the partnership.

6.2 Legal implications

The work of family hubs and the proposals outlined in this report supports the City Council's duty to safeguard and promote the welfare of children within their area who are in need. The duty is a general duty to provide a range and level of services to Children in Need in the LAs area and not to a specific child.

Prior to entering into the grant agreement Legal Services will review and provide the necessary advice on the legal agreement/s required to be signed to accept the funding.

Other implications

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

The Family Hub and Start for Life Programme supports the One Coventry Corporate Plan's vision to improve the quality of life for Coventry people by:

- Improving educational outcomes
- Making communities safer
- Improving health and wellbeing
- Protecting our most vulnerable people - Keeping children and adults safe from harm, providing early intervention for families who need it; Enabling people to exercise choice and control in their daily lives; Improving services for people experiencing domestic violence and Preventing homelessness and helping people who do become homeless
- Reducing health inequalities – giving our children the best start in life and helping support people facing multiple and complex needs.

The integration of services to support children, young people and their families is a way of delivering the Council's properties through active communities and empowering citizens and working together with partners across the voluntary, public and private sectors to

- Enable residents to self-serve by maximizing the use of new technology
- Pool and share resources
- Solve local problems

6.3.1 How does this connect with One Coventry Services Plan ?

This is an operational change Programme within the Transformation Plan 2024/25, which aims to deliver services differently by bringing them together in communities and builds on current approaches within family hubs, libraries and adult social care settings. Proposals aim to enable increased integration of a wider range of services

and deliver financial efficiencies through reducing the number of service delivery locations and thereby the costs of operating these services in terms of both property and staffing. This is a programme of work that will develop over time, and the first phase of the proposals were consulted on between 9 September 2024 and 4 November 2024, and it is anticipated that that a cabinet decision will be reached on these proposals in April 2025. This may have an impact on the use of the current Family hub buildings and how services integrate in the future to deliver the offer in the community.

6.3.2 How does this connect with Coventry Connects programme?

All Family Hub buildings are all distribution points for data sim cards to provide for those in digital poverty. They also all have free wifi and public access computers. The Family hub offer also includes a new digital portal, helping to provide access to the offer virtually as well as physically and there are ongoing developments reading using Ai and automated care pathways to enable technology to enhance the human experience and reach more families. There are also staff in Family hub buildings trained as digital champions.

6.4 How is risk being managed?

6.4.1. The possibility of a failure to identify providers to deliver on each aspect of the funded Programme is minimised as there is already Family Hubs in place with a range of agencies and service providers committed to the Programme, and a wider early help partnership offer to draw from.

6.4.2 The risks associated with possible failure to deliver on the key priorities of the Programme and the requirements of the grant are mitigated using expert personnel who are highly experienced in developing and delivering national programmes, and who will be supported and advised by personnel from the Family Hubs Start for Life Unit, DHSC.

6.5 What is the impact on the organisation?

Delivering effective prevention and early help for children and their families to secure positive outcomes is a significant priority for many functions of the City Council, including Children's Services, Safeguarding, Education, Migration, Employment and Skills and Public Health. The work of our Family Hub Programme in alignment to the National Programme specification will further improve the delivery of integrated early help and prevention services and enable impact against health inequalities outlined by the Marmot partnership.

6.6 Equality Impact Assessment (EIA)

An Equalities Impact Assessment was undertaken in 2018 at the commencement of the Coventry Family Hub Programme.

The Family Hub and Start for Life Programme provides city wide support to children, young people and families and will enhance the work to reduce inequalities and outcomes for children, young people, and their families in need of early help. In the next year the Programme will prioritise engagement with vulnerable communities including those seldom heard or less reached including children with special

educational needs and disabilities, refugee and asylum-seeking families, families experiencing homelessness, working with fathers and supporting families living in poverty.

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

There are no implications

6.8 Implications for partner organisations?

A wide range of partner agencies (statutory, commissioned, and voluntary and community sector) take an active role in the Early Help Strategic Partnership (EHSP) and the Family Hub network. The Family Hub Programme Board, which includes senior officers from both the Children Services, Public Health and the Integrated Care Board, provides the governance for this work, as well as the EHSP, as a subgroup of the Coventry Safeguarding Children Partnership. A One Coventry approach is taken by this Strategic Partnership.

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Public report
Cabinet

Cabinet

18 March 2025

Council

25 March 2025

Name of Cabinet Member:

Cabinet Member for Adults Services – Councillor L Bigham

Director approving submission of the report:

Director of Adult Services and Housing

Ward(s) affected:

All

Title:

Re-commissioning of Long-Term Home Support

Is this a key decision?

Yes - the proposals involve financial implications in excess of £1m per annum and impact on all wards.

Executive summary:

The Council has a statutory duty under the Care Act (2014) to provide care and support to adults whose needs meet the eligibility criteria detailed in this legislation. This includes wellbeing and prevention duties that prevent the need for more intensive forms of care and support. Home support is commonly referred to as domiciliary care or home care and the terms are used interchangeably. Home support is regulated by the Care Quality Commission (CQC) and can cover a wide range of activities, including (but not limited to) the provision of personal care such as assistance with washing/bathing, getting dressed, going to the toilet as well as support with medication, nutrition, and hydration. These services are delivered in the person's home and seek to support people to remain in the community and promote independence as much as possible. Being supported in their own homes is the preference for most people requiring care and support rather than more intensive forms of care and home

support is often supplemented by the use of technology to enable people to remain supported at home.

Home support can also extend to reablement services (help to regain or retain skills and confidence) for people leaving hospital or seeking care and support for the first time. Reablement services seek to delay or reduce the need for ongoing care and support. These services are not the subject of this re-commissioning as services were tendered with new contracts commencing in May 2024, however those people going on to require ongoing support to live at home will benefit from the revised commissioning arrangements

The current re-commissioning is, therefore, restricted to Long Term Home Support Services (LTHS) with current contractual arrangements which are due to expire in December 2025.

Recommendations:

Cabinet is requested to recommend that Council:

1. Delegate authority to the Director of Adult Services and Housing, following consultation with the Director of Finance and Resources and the Director of Law and Governance, to undertake the tendering of long-term home support services (including the power to enter into any necessary legal agreements required to facilitate entering into the contracts for a period up to 8 years) .

Council is recommended to:

1. Delegate authority to the Director of Adult Services and Housing, following consultation with the Director of Finance and Resources and the Director of Law and Governance, to undertake the tendering of long-term home support services (including the power to enter into any necessary legal agreements required to facilitate entering into the contracts for a period of up to 8 years).

List of Appendices included:

The following appendices are attached to the report:
Appendix 1 Equality Impact Assessment

Background papers:

None

Other useful documents

None

Has it or will it be considered by Scrutiny?

No

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

No









Will this report go to Council? - Yes - 25 March, 2025

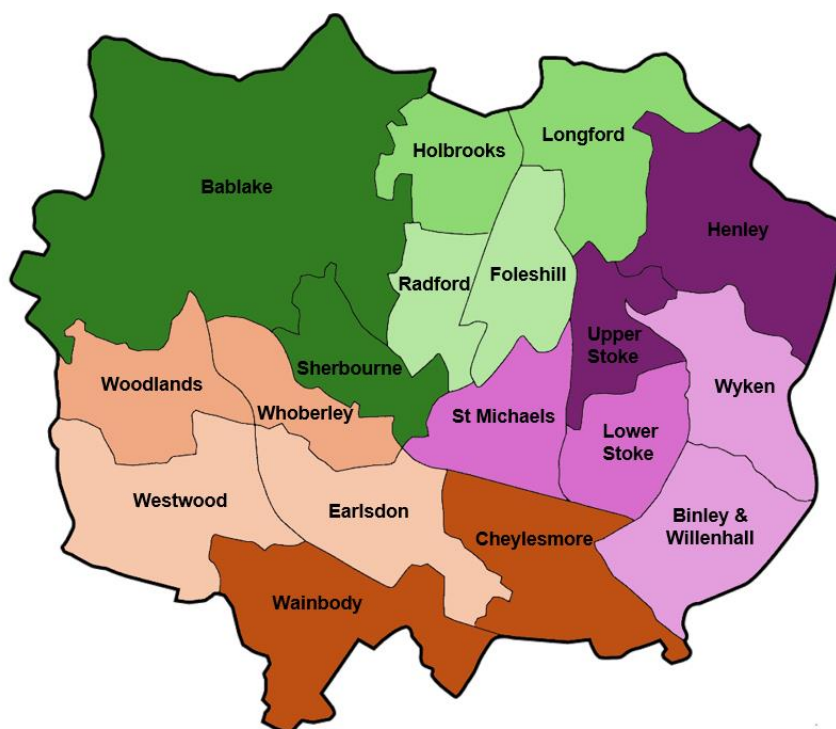
Report title: The Recommissioning of Long-Term Home Support

1. Context (or background)

- 1.1 The Council has a statutory duty under the Care Act (2014) to provide care and support to people whose needs meet the eligibility criteria detailed in this legislation. This includes wellbeing and prevention duties that prevent the need for more intensive forms of care and support. Home support is commonly referred to as domiciliary care or home care and the terms are used interchangeably. Home support is regulated by the Care Quality Commission (CQC) and can cover a wide range of activities, including (but not limited to) the provision of personal care such as assistance with washing/bathing, getting dressed, toileting as well as support with nutrition and hydration. These services are delivered in the person's home and seek to support people to remain in the community and promote independence as much as possible. Being supported in their own homes is the preference for most people requiring support that promotes their wellbeing.
- 1.2 Home support can also extend to reablement services (help to regain or retain skills and confidence) for people leaving hospital or seeking care and support for the first time. Reablement services seek to delay or reduce the need for ongoing care and support. These services are not the subject of this re-commissioning as services were recently re-tendered with new arrangements commencing in May 2024.
- 1.3 The current re-commissioning is, therefore, restricted to Long Term Home Support (LTHS) services with current contracting arrangements ending on 19th June 2024 (with an option to extend further until 30th November 2025). This report seeks approval of the proposed recommendation that the procurement of these services commences in May 2025 for a contract start date of December 2025.
- 1.4 As home support provision is based on assessed need, the amount of care commissioned can vary. However, in the 12 months to January 2025, on average around 1160 individuals were supported per week and approximately 14,370 weekly hours of ongoing home support care was provided equating to circa 749,000 hours annually.
- 1.5 Currently all but one commissioned home support care services in Coventry are rated by CQC to be of 'Good' quality with the remaining service rated as "Requires Improvement" and receiving support to attain an improved position. The rating was received in August 2022 and the Council's view is that the service quality has subsequently improved significantly.
- 1.6 As of February 2025, there were 112 home support providers registered by CQC with a base in the City. The Council currently commissions 15 of these.
- 1.7 The Council's Market Position Statement (MPS) published in September 2024 outlines the type and quality of services that we would like to see operating in the city.

- 1.8 The MPS highlights the City Council's ambition for everyone to receive care and support that is of the highest quality, affordable, prioritising safety, outcomes, dignity, choice, control, and wellbeing. This will be achieved through clear standards, targets, and support to our providers to deliver quality care with high service user satisfaction and respect for individuals. As a baseline we expect all providers to achieve a minimum 'Good' CQC rating or be proactively making progress towards achieving this. The service specification will focus on essentials to minimise unnecessary cost being built in. Key requirements will include sufficient and suitable staffing to provide consistency and reliability of service delivery and using technology where this provides better outcomes at lower cost. There will be expectations around the values, training and support of staff to enable good support for people with mental ill health/dementia and those with learning disabilities and/or neurodiversity.
- 1.9 Home support accounts for approximately 40% of the long-term support commissioned by Coventry Adult Social Care (source Market Position Statement 2024-2029) where we can source home support quickly for individuals utilising our delivery model which is focussed on providers focussing delivery in an area of the City or 'cluster'
- 1.10 Whilst our current offer works well in respect of capacity, availability, and market stability, we do experience some challenges in:
- Ensuring consistency in the support delivered in respect of timing of care calls, consistency of care staff, concerns over language barriers of staff and ability of staff to make nutritious food.
 - Ensuring staff are working in a manner which promotes the individual's independence.
 - Meeting the needs of people in a way that fully respects their cultural needs
- 1.11 Our re-commissioning is designed to address these challenges without building in avoidable cost whilst building on our existing cluster-based model which ensures optimum numbers of providers for general home support needs whilst specialist support is proposed to be provided on a citywide basis for younger adults with learning disabilities and/neurodiversity or those with significant mental ill health. We also intend to encourage involvement of smaller enterprises including potentially microenterprises that are more able to provide more bespoke services catering for specific needs e.g. cultural religious requirements by permitting sub-contracting (with appropriate checks and balances) and welcoming consortium bids.
- 1.12 The proposed cluster model is illustrated in the following diagram. The clusters align to our short-term home support zones and Local Integrated Team geographies. The contract will make it clear that geographies may be modified in future as work in relation to Neighbourhood teams for community services is taken forward

Long Term Home Support	
	Cluster 1 (Holbrooks and Longford)
	Cluster 2 (Foleshill and Radford)
	Cluster 3 (Bablake and Sherbourne)
	Cluster 4 (Whoberley and Woodlands)
	Cluster 5 (Earlsdon and Westwood)
	Cluster 6 (Cheylesmore and Wainbody)
	Cluster 7 (Binley & Willenhall and Wyken)
	Cluster 8 (Lower Stoke and St Michaels)
	Cluster 9 (Henley and Upper Stoke)



- 1.13 There have been 2 instances during the financial year 2023/24 whereby independent sector Housing with Care schemes have opted out of providing care and support for social care eligible service users having converted to Sheltered Housing schemes. In these instances, care has been reallocated to the cluster provider in the area where schemes are situated. To cater for the possibility that one or more further schemes might convert to Sheltered Housing during the lifetime of the Long-Term Home Support contract contingency arrangements are built into the specification from the outset.
- 1.14 It should be noted that there are also other types of provision of long-term home support that fall outside of this tender arrangement namely Council Commissioned contingency provision and legacy provision.
- 1.15 Contingency provision was put in place because of difficulties that some cluster providers were having in fulfilling timely take up of home support packages particularly relating to Covid 19 related issues with staffing availability. As of February 2025, there were two contingency providers with a total of approximately 1400 hours per week between them. It should be noted that demand on contingency providers is reducing. The second area of provision relates to legacy arrangements from the previous retendering of long-term home support. Again, hours are low and reducing as no new business is referred to these providers with 770 hours per week being provided as of February 2025.
- 1.16 The Integrated Care Board (ICB) is also a purchaser of home support services for people with low level continuing health care. Although within the current contracts this will not be a feature of this procurement. This is because it is more appropriate for ICB colleagues to commission this support alongside more complex continuing health care

packages and because of complexities of different procurement regimes for health (Health Care Services (Provider Selection Regime) Regulations 2023).

2 Options considered and recommended proposal

2.1 Option 1 (preferred Option)

2.1.1 Recommission Long Term Home Support on the basis outlined in Section 1 of this report , continuing with the cluster model with a streamlined specification to ensure affordability and a greater focus on commissioning for diversity.

2.1.2 Enable recommissioning of services for a period of up to eight years (four years plus two potential extension arrangements of two years) but ensure that the contracts allow for changes or updates so that the service develops with any required modification and supports any future development to health and social care integration and performance.

2.1.3 In order to ensure that the flexibility exists within these contracts, provision will be made to implement changes as service requirements evolve. Such changes are most likely to arise from improvements in how we work with health organisations to provide improved outcomes to people and as a result of potential changes to the policy framework for social care.

2.1.4 Due to the nature of the service and the risk to vulnerable services users, it will be the intention to allow existing service users to remain with current providers on-going. If/where incumbent providers are not successful, approval will be sought to extend contracts under legacy arrangements under existing hourly rates which will be subject to wage inflation. This would be for existing service users only and all new provision will be referred to new contracted provision. This will also enable newly awarded provider hours to be build up under contract mobilisation.

2.2 Other Options

There are no other options that would meet legislative requirements as a periodic competitive market testing is required.

3 Results of consultation undertaken

3.1 Service users and other stakeholders have been consulted in several ways.

3.2 An online survey of service user experience has been used for engagement which has supplemented a “real time survey” of all new adult social care service users which takes place on a continuous basis. A series of face to face and telephone interviews also took place during June/July 2024. Key feedback from all of these engagement exercises has been in relation to consistency of carers, reliability (presenting as expected, at a reasonable time and staying for the prescribed length of time) and ability to cater for needs in ways that people want. These matters will form the basis of Key Performance Indicators in contracts going forward.

3.3 Engagement with providers took place in April 2024 to inform both the short-term and long-term re-commissioning. This produced feedback that providers needed to be sustainable in terms of costs and volumes. There was little interest in payment by outcomes type models or widescale delegation of health tasks to home support providers. Further market engagement took place in December 2024 and provider feedback comprised the following key themes:

How Providers can support the needs of a diverse community

- Advertising and engaging in local communities
- Recruiting for specific needs
- Tapping into volunteering groups, companionship schemes, signposting
- Shared space for providers to utilise for networking
- Initial assessment- Occupational Therapists, Physiotherapists and District Nurses to contribute to assessments.
- Assistive technology to help to overcome skills shortages. Using technology to monitor focus, movement, etc frees up time for carers to deliver vital, human only care interventions

How to continuously improve the quality of care:

- Recruitment is key – especially education for new recruits and continuous development and training – Recruit staff with multi language skills.
- Staff appraisals / supervisions
- Spot checks, internal audit checks
- Accurate reporting and recording
- Staff buddying
- Hands on care
- Listening to clients
- Assistive technology
- Joint visits with social worker
- Continuous communication

3.4 A key result of engagement feedback is that people look for consistency of support. There are also known risks of changing providers of support to those with significant levels of vulnerability, therefore, any current providers who fail to win a contract going forward will be awarded a legacy contract and keep their existing service user base but will not be considered for any new placements.

3.5 Feedback received around cultural needs will inform the requirements of providers and Key Performance indicators within contracts

4 Timetable for implementing this decision

4.1 Subject to Cabinet and Council approval a tendering process will commence in May 2025 for new contracts to commence from December 2025.

5 Comments from Director of Finance and Resources and the Director of Law and Governance

5.1 Financial Implications

5.1.1 Long Term Home support is a key component of service delivery within Adult Social Care. Hours can vary week by week depending upon demand in the service and based on expected hours of delivery is estimated to cost circa £15.5m per annum based on estimated costs at implementation and will be funded from within existing core budgets.

5.1.2 Service delivery costs are heavily influenced by changes to employment costs, with the rate set each year for National Living Wage (NLW) being the most significant. For 2025/26 additional employment costs introduced through increased employer national insurance contributions have also increased service delivery costs. Future annual inflationary increases to provider rates will similarly be influenced by future changes to the NLW and other relevant inflationary measures.

5.2 Legal Implications

5.2.1 The Care Act 2014 and the Care and Support Statutory Guidance provides the legal framework for the provision of adult social care. The provisions of the Act include general duties to meet eligible needs and promote individual wellbeing. The provision of LTHS is consistent with those duties and one means by which the Council is able to meet its statutory obligations under the Act, towards the citizens of Coventry.

5.2.2 The proposed procurement must be compliant with both the Public Contracts Regulations 2015 (PCR), or replacement Procurement Act 2023 if this is in force at time of tender, and the Council's Contract Procedure Rules. Given the nature of the procurement, the 'Light Touch' procurement is available.

5.2.3 The Council has a legal obligation under section 149 Equality Act 2010 to have due regard to the need to eliminate discrimination, advance equality, and foster good relations between those with a protected characteristic and those who do not share it. The Council continues to engage with service users and representative groups, and use the information and views gathered in its consultation and equality impact to achieve accessible and inclusive service provision.

5.2.4 The Government may, during the life of these contracts, introduce a National Care system. This will be informed by an Independent Commission on Adult Social Care, which will report in 2028 with interim findings expected in 2026 however, it is too soon to determine what impact this may have, although it is unlikely to have a detrimental one.

6 Other implications

6.1 How will this contribute to the One Coventry Plan?

Re-commissioning of Long Term Home Support will contribute to the One Coventry Plan in several ways namely:

Helping residents to maintain their independence for longer in their own homes thus reducing need for support from accommodation-based services.

Protecting the most vulnerable in Coventry through exercising their choice and control to remain in their own homes following illness or injury and often after a period of reablement.

Supporting the economy by contracting locally where possible, encouraging new businesses including SMEs, microenterprises/employee-owned enterprises to be involved in delivery through consortia or subcontracting and stimulating the contracted adult social care market. This approach intends to enable all our communities to benefit from job opportunities created by investment in the city. This links closely to the Marmot principle “create fair employment and good work for all”

6.2 How is risk being managed?

There is an established project team to manage risks and any ongoing performance and issues meeting that is held monthly. Tendering risks will be managed through statutory procurement guidelines. There is a potential risk that insufficient providers of good quality tender to deliver this service. Soft market testing and a workshop has been held, however, with several potential new entrants to the market showing interest alongside several existing providers. Provider feedback was that this type of delivery is of interest to them.

6.3 What is the impact on the organisation?

As this procurement will involve solely external partners there are no human resource implications for the Council.

6.4 Equalities / EIA?

A separate EIA has been completed and appended to this report. It is expected that the service will continue to have a positive impact in enabling people to live as independently as possible. Positive impacts are anticipated in relation to people aged 65+ and those with disabilities and/or mental ill health due to the enabling nature of the service. Greater tailoring of the service to cater for people of different racial backgrounds, religions and beliefs is expected to have a positive impact.

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

The contract will include requirements in relation to reducing the environmental impact of the services.

6.6 Implications for partner organisations?

Due to differences in Procurement regulation for health and social care (Public Contract Regulations 2015/Procurement Act 2023 for Local Authorities and Health Care Services (Provider Selection Regime) Regulations 2023 for health services), these services will not be jointly tendered with the Integrated Care Board

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Appendix 1

Equality Impact Assessment

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Equality Impact Assessment

EIA-670877893 - Recommissioning of Long Term Home Support (Adults)

Details

Title	Recommissioning of Long Term Home Support (Adults)
Author	Dionne Clarke / Lisa Taylor (Commercial Programme Manager / Commissioning Officer)
Head of Service	Jon Reading (Head of Service – Commissioning and Quality (Adult Social Care))
Cabinet Member	Councillor Linda Bigham (Lead Cabinet Member for Adult Social Care)

Context and background

EIA carried out on Commissioning

This EIA is submitted with regards to recommissioning of Long-Term Home Support (LTHS) for Adults.

The Council has a statutory duty under the Care Act (2014) to provide care and support to people whose needs meet the eligibility criteria detailed in this legislation. Home support is commonly referred to as domiciliary care or home care and the terms are used interchangeably. Home support is regulated by the Care Quality Commission (CQC) and can cover a wide range of activities, including (but not limited to) the provision of personal care such as assistance with washing/bathing, getting dressed, going to the toilet as well as support with nutrition and hydration. These services are delivered in the person's home and seek to support people to remain in the community and promote independence as much as possible.

Background Long Term Home Support (LTHS) is a key feature in the delivery of good Health and Social Care Services. The service supports adults to acquire or reacquire living skills to remain residing independently in their own homes, a key policy objective for Health and Social Care. The service is a key alternative to residential or accommodation-based support, helping people maintain their independence and live in their own homes in their own communities for longer. In addition to providing support to the individual, home support can be a key means of support for informal or unpaid carers, reducing the risk of carer breakdown.

LTHS currently support approximately 1884 individuals per annum, providing an 183,600 hours annually.

With current contractual arrangements coming to an end in October 2025, Adults Commissioning will be recommissioning the LTHS service with a view to commence new contracts Winter 2025.

Stakeholders

- Coventry City Council
- Integrated Care Board (ICB)
- Providers of adult social care LTHS
- Individuals in receipt of LTHS
- Carers of individuals in receipt of LTHS
- Practitioners - CCC ASC

Responsibility Jason Bejai – Commissioning Manager

Consideration of impact

Long Term Home Support services support adults and children/young people, providing personalised care and support to people in their own homes to enable individuals to live independently. Eligibility criteria for this Adults LTHS is for social care and adults eligible for non-complex health funded Continuing Health Care. The service also assists carers/parents to maintain their caring role.

Providers under the contract support approximately 1884 individuals per annum, providing a total of 183,600 hours of care on average. The service works in a strengths-based manner, focusing on reablement principles wherever possible with practice rooted in a promoting independence style approach. The service caters for anyone with assessed eligible need who wishes to receive support at home.

The service commenced 19 June 2017 for an initial 5-year term to 18 June 2022, extended for a further 2 years to 18 June 2024.

General Data: Coventry City Population and Workforce Age

The number of older people within the City is increasing, with this group expected to accelerate and outpace other groups. Coventry City Council population and demographics data indicates there are 55,846 people aged 65+ in Coventry, around 16% of Coventry's population and a 9% increase since 2011. By 2029, the city should expect to have an additional 8900 people aged over 65 and an additional 2000 aged over 85.

Baseline data and information

The population of adults aged 18-65, alongside the general population of Coventry, also continues to increase; Census 2021 data notes an increase of 8.7% for the 15-64 age range.

Coventry also has an aging care workforce. Data from Skills for Care* indicates the average age of a worker in adult social care is 43 years; 66% are aged between 25-54, 24% above 55 and only 11% are under 25.

Diversity

33% of Coventry's population are BME, with the city expected to become even more diverse; half of Coventry pupils (52%) are from BME backgrounds. In respect of Coventry's* social care workforce, 26% of individuals are from a BME background. Only 15% of the workforce are male.

*Information is in respect of Coventry and Warwickshire ICS data via Skills for Care, February 2023

Home support specific demographics

At present, the demographics of individuals in receipt of home support provision is not aligned to general demographics

Census 2021 reported 65.5% of people identified their ethnic group as 'White', whilst 76.1% of home support provision is delivered to individuals of white ethnicity. See Figure 1 below:

Figure 1 – demographics of ASC individuals in receipt of home support services 2023/24 (as at February 2024)

Further work is required to understand potential reasons for this imbalance, with mitigating action implemented in the service specification and provider requirements to ensure positive action is taken to reduce potential for barriers to accessing support by different demographics or cultures of individuals in the city.

Protected groups

Age 0-18

No impact - The service is specifically for older adults, therefore will not be an care option for this group, however, it doesn't detract from younger person services provided in the city.

Positive impact - Positive impact - This group will be positively impacted by the recommissioning of this service.

Developing a revised and updated LTHS service offer from the local authority will benefit service users and enable people to remain healthy and well in their own homes.

Age 19-64

The recommissioned and updated service will be better able to meet the varied needs of individuals in receipt of care. It will also support recruitment and retention of provider staff within this age range, which has struggled since the beginning of the pandemic in 2020. At times provider staff turnover was over 29% (one in every three new staff members leaves within twelve weeks). With increased recruitment and retention, we expect to improve both the quality and the continuity of care received.

Age 65+

Positive impact - This group will be positively impacted by the recommissioning of this service.

The majority of individuals in receipt of LTHS in Coventry are over 65 years old. This demographic will therefore be the user group most commonly affected by anticipated improvements to the stability and quality of LTHS in the city and experience improved care outcomes, enabling people to remain healthy and well in their own homes for as long as possible.

Positive impact - This group could be positively impacted.

The updated LTHS service should positively benefit individuals with a disability supported by adult social care LTHS providers. The revised service specification will specifically outline plans to better support people with disabilities to remain in their own homes.

Key elements of the new service will focus on reablement and enablement for people to reacquire or develop new skills following injury, illness or condition specific disabilities.

Disability

For some individuals with a disability, e.g. a learning disability, the potential impact of this on staff retention and continuity of care and support may be significant; it can be particularly distressing for individuals when their support offer or individual staff members change. We therefore hope to keep continuity of this care by retaining staff who have supported individuals for prolonged periods of time and learnt an individual's communication methods and preferences, increasing the health and wellbeing of people in receipt of support. Equally, the revised service specification will include additional mandatory training requirements for all staff to ensure a fully trained workforce, including mandatory Oliver McGowan training in line with the Health and Care Act 2022.

The 2021 Census indicated 1 in 5 of the working age population are classed as disabled and a national disability employment rate of 52.7% (compared to 81% for non-disabled people). In Coventry, 8.4% of residents identified as being disabled and were limited a lot; 10% identified as disabled and limited a little.

No impact - No impact - The care provided is not gender specific therefore there is no impact.

Gender reassignment

The Council will encourage Providers to develop policies and practices to ensure services cater for the needs of our diverse communities, including support for transgender and non binary people who may experience discrimination in care settings.

Pregnancy and maternity

No impact - The service is aimed at older adults (65 years old+) 18 years older, therefore will not be an care option for this group. However, it doesn't detract from pregnancy and maternity services provided in the city.

Positive impact - The recommissioning of LTHS is expected to impact this group positively.

There is some evidence that some diverse ethnic groups may be more likely than others to have care needs. For example, disability-free life expectancy is lowest for Pakistani and Bangladeshi groups (source Gov.uk) and health-related quality of life score for older adults are lower amongst many diverse ethnic groups relative to the White British group, according to the 2017 GP patient survey (source Gov.uk). By recommissioning LTHS it may have particular benefits for some underrepresented groups and thereby encourage equality of opportunity for those who share a protected characteristic and those who do not.

Race

People from diverse ethnic communities form 31.4% of the social care workforce (source WM ADASS). The Council will work to ensure that at least a proportion of any newly contracted service is representative of Coventry's community and people in receipt of services.

We also intend to encourage involvement of smaller enterprises including potentially microenterprises that are more able to provide more bespoke services catering for specific needs e.g. cultural religious requirements.

Our service specification will contain requirements to declare the number/proportion of international recruits and will discourage over-reliance on this source of support in line with Government policy

Positive impact - This group could be impacted positively.

Some people with different religions or beliefs may have different social care needs. For example, some people may face language or cultural barriers to accessing services, while other people may have special dietary requirements or needs to mark religious days. Likewise, people of different backgrounds or faiths may not believe a career in care is open to them or be aware of the career paths available.

Religion and belief

Through the council's current recruitment initiatives for the contracted provider workforce, we hope to attract a range of individuals from different cultural backgrounds and beliefs into the adult social care workforce. We envisage (alongside facilitating jobs and recruitment) that this will bring different perspectives into the care workforce and assist in providers delivering support in line with an individual's religious preferences and beliefs by carers with shared faiths and experience

No impact - No impact - The care provided is not gender or sex specific therefore there is no impact.

Sex LTHS does not treat people differently based on their sex or gender. There are however various factors which may mean that women are more likely to benefit from LTHS. For home support, a significantly higher proportion of users are women.

Women are more likely than men to be disabled. In the 2019 to 2020 Family Resources Survey, 24% of females reported having a disability compared to 19% of males.

Sexual orientation No impact - LTHS is provided irrespective of sexual orientation.

Care experienced No impact -

Health inequalities (HI)

Many individuals accessing the service are people who finish on Short Term Home Support (STHS) and require an on-going sequential service that is council funded, will have met eligibility criteria under The Care Act 2014, specifically that their needs relate to a physical or mental impairment effecting several aspects of their daily life. Other individuals accessing the service may never have received support of adult social care, or may be moving from another care setting (for example accommodation based). LTHS is designed to support individuals in meeting their health and wellbeing outcomes – including health inequalities - and meet individual support needs in a tailored way. Such care is delivered equitably, fairly and in a proportionate way, recognising the individual need of the person.

Whilst individuals may prefer to be supported at home, there is a risk of increased isolation, reduced social contact and delay in identifying escalation in need.

Inequalities may also be faced by provider staff, or potential staff, in accessing care roles; language barriers, accessibility issues and cost of transport to interviews or work, for example, may prevent individuals accessing careers in the care sector.

The One Coventry Plan 2022-30 includes the key interconnected priorities below: -

How HI will be reduced

- Increasing the economic prosperity of the city and region
- Improving outcomes and tackling inequalities within our communities.

This service directly and positively responds to these priorities by: -

- Helping residents to maintain their independence for longer in their own homes thus reducing need for support from accommodation-based services
- Protecting the most vulnerable in Coventry through exercising their choice and control to remain in their own homes following illness or injury and often after a period of reablement
- Effectively delivering the essential services that matter most to our communities
- Working with NHS partners to encourage healthy lifestyles and provide quality healthcare to all communities across the city; this links closely to the Marmots principle “ensure a healthy standard of living for all”
- Supporting the economy by contracting locally where possible, encouraging new businesses including SMEs, microenterprises/employee-owned enterprises and stimulating the contracted adult social care market. This approach intend to enable all our communities’ benefit from job opportunities created by investment in the city. This links closely to the Marmots principle “create fair employment and good work for all”
- Tackling inequalities through a collaborative approach, with residents, communities, and partner organisations and through alignment with our Health and Wellbeing (HWB) Strategy; Coventry is a Marmot City as part of the HWB Strategy

Evidence showing how HI will be reduced

The service works to achieve outcomes including impact based on keeping people healthy and well in their own homes.

Groups of people who face HI

Groups noted in the previous Protected Groups section:

- Individuals with a disability supported by adult social care LTTHS providers.
- Age 19-64
- Age 65+
- Race
- Service Users -The health of people in receipt of the services may benefit in a positive way through improved quality of life, resulting in better outcomes
- Carers of individuals in receipt of LTTHS

Service Users:
The health of people in receipt of the services may benefit in a positive way through improved quality of life, resulting in better outcomes.

means of reducing inequalities experienced by users of the service:

- A requirement for providers to work in a preventative manner, proactively working to support people to avoid isolation and increase wellbeing. This may be through linking individuals with local community groups or support organisations or supporting the individual to build confidence to make links in the community.
- Providers will complete annual provider-led reviews, ensuring at minimum an individual's needs are reviewed (in some form) annually and their care package adjusted accordingly. This process will have oversight of the Council to ensure quality reviews and appropriate adjustments are made where required and will work to supplement statutory social care reviews. This also ensures the valuable information gleaned from the provider on a daily basis in providing direct care is put to best use, and gives the individual a further formal opportunity to be active participants in their care planning.
- A target percentage of people per year who would benefit from a reduction in their care package. Reasons for this may be due to a partial or full reablement, changes in need requiring a reduction in support, or alternative assistive technology or community provision able to meet all or part of the care package / needs requirement. Whilst the aim of this target is not to reduce support unnecessarily, we hope this will mitigate any possibility of overprovision (leading to loss of skill or independence to the individual), increase opportunities for individuals to experience alternative provision or support, and ensure the correct levels of support can be implemented at pace, tailored to individual requirements.
- A significant programme of work, 'Improving Lives', is currently underway working to improve the experiences of individuals in receipt of health and social care with specific focus on hospital discharge into care provision. Once complete, any learnings taken from this work involving the Short Term Home Support Service (STSH) will be implemented where appropriate to LTHS
- We also intend to encourage involvement of smaller enterprises including potentially microenterprises that are more able to provide more bespoke services catering for specific needs e.g. cultural religious requirements.

**How to improve HI
for groups
identified**

Provider staff:

There may be positive impact on the health of provider staff.

The Council has and will continue to work with providers to ensure best use of funding within the financial envelope available. Any effect of this on provider staff will likely be positive in relation to:

- Increased job security
- Fair recruitment practices (supported by CCC)
- Payment of the NLW or above
- Good working conditions
- Increased training and knowledge

The council will work with the home support market to understand the benefits of access to green travel / electric vehicles and investigate options to facilitate this, in turn reducing both fuel costs and the carbon footprint of this method of care delivery.

The Council will also be supporting on recruitment events to assist in diversifying the workforce; Skills for Care data states only 15% of the workforce are male and 26% of the general workforce are from an ethnically diverse background. Such statistics are not reflective of the city's demographics and by assisting in recruitment in this area we hope providers will be in a stronger position to meet the cultural needs of the service users they support. Examples of events which have taken place so far have included job fayres specifically supporting refugee and migrant workers into adult social care employment.

Future events are planned to be held in a range of wards / areas across the city to eliminate barriers in respect of transport, enable ease of access by different communities and create links between local people and local businesses; likewise, events and programmes aimed specifically to support unpaid carers and individuals with a disability are also planned.

The new LTHS service will be tendered (following Cabinet approval) in the new financial year (April 2025). Specific provider and service user engagement activities will also be continued by the Council, the impact of these will be used to ensure that new services are fit for purpose and designed to meet needs of people as outlined in this EIA.

Digital inequalities (DI)

Due to recent market changes and improved use of technology, the following areas may require mitigating action to reduce the potential for digital inequalities:

Impact to DI

-Digital switchover: individuals in receipt of the support of assistive technology may experience a possible disturbance when switched over from analogue to digital. This is a national programme and control over this by the Council is minimal.

-Knowledge of digital technologies and systems to support a move towards a more digitalised care offer: We are aware provider staff may not necessarily have the skills to support a move to a more digital based care offer and its associated systems. There will also be a new requirement for providers to be DSPT compliant (a qualification that ensures all data is stored and handled appropriately).

-Advertisement of recruitment fayres: Digital advertisement of our recruitment initiatives e.g. advertising job fayres / recruitment days, job descriptions and advertisements, are largely publicised online (although also publicised via flyers, word of mouth and printed means).

Opportunities to reduce DI

-Digital switchover: We will work with providers and relevant stakeholders to ensure, as much as possible, both individuals and providers effected by the switch are informed and able to remain safe should an issue arise.

-Digital technologies / digital support offer: Support and 'digital champion' training will be offered to providers via the Coventry Connects digital training scheme to ensure staff are appropriately skilled in an effective, sensitive manner. Support, including opportunities to obtain grant funding to fund associated technology or equipment such as digital social care records, will be provided to ensure providers are able to achieve DSPT complaint. This offer is universal to the market however will be a key step in ensuring equality of access to information, training and equipment, whilst mitigating any potential data security risks, as some providers may not be digitally confident.

-Advertisement of recruitment fayres: To supplement digital advertisement, posters / paper advertisement and conversations will be utilised to ensure as many people are aware of upcoming events. Paper information will also be available during events, including the ability to complete paper job applications (online application options also available) at job fayres the day.

Inequality	Action	Owner	Timescale

Monitor and evaluation	Monitoring of KPI's / contractual requirements at quarterly contract meetings (e.g. ensuring DPST compliance)		
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Impact on Council staff

Will there be an impact?	No
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Completion statement

Potential equality impact	Positive impact has been identified for one or more protected groups
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Coventry City Council

Briefing note

To: Cabinet

From: Education and Children's Services Scrutiny Board (2)

Date: 13th March 2025

Subject: Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996

1 Purpose of the Note

- 1.1 To inform Cabinet of the recommendations from the Education and Children's Services Scrutiny Board (2) following consideration of an item on Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996 at their meeting on 13th March 2025

2 Recommendations

- 2.1 The Education and Children's Services Scrutiny Board (2) recommend that Cabinet:
- 1) Approve the policy and approach for supporting children who are unable to attend their education setting under Section 19 of the Education Act 1996
 - 2) Delegate authority to the Director of Children and Education Services and the Director of Finance and Resources to oversee, monitor and implement the Policy
 - 3) Request a glossary of terms be appended to the Policy
 - 4) Request the flow chart at Appendix 1 be made more user friendly.

3 Information and Background

- 3.1 At their meeting on 13th March, the Education and Children's Services Scrutiny Board (2) considered a Cabinet Report on Supporting Children Who are Unable to Attend their Education Setting under Section 19 of the Education Act 1996.
- 3.2 The Board asked questions of the Cabinet Member and officers and received responses on the following areas:
- Affordability of implementing the policy for schools and that the impact would be monitored and managed on an ongoing basis.

- The disproportionate representation of White British children within the cohort of permanent exclusions and steps taken to reduce exclusions. This matter will be the subject of a specific item next municipal year
- If a child is ill and unable to work at home, the policy would only be used if the school wasn't able to provide access to education
- The overlap with Education Health and Care Plans and exclusions and steps being taken to reduce permanent exclusions
- How families are still able to access free school meals if a child is absent from school for a period of time
- The multi-agency approach to reducing exclusions and whether there are any characteristics that make children at higher risk of exclusion and how those children can be safeguarded if they are not in school.

4 Health Inequalities Impact

- 4.1 A full EIA, including health inequalities, has been completed as part of the Cabinet Report process.

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