

Time and Date

2.00 pm on Tuesday, 17th March, 2026

Place

Committee Room 3 - Council House

Public business

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 12)
 - (a) To agree the minutes from the meeting of Cabinet on 24th February 2026
 - (b) Matters arising
4. **Private Sector Housing Enforcement Policy 2026-31** (Pages 13 - 162)
Report of the Director of Law and Governance
5. **Coventry One Strategic Plan and Education Capital Programme 2025 - 2029** (Pages 163 - 200)
Report of the Director of Childrens and Education
6. **Coventry: City of Movement Strategy 2026-2031** (Pages 201 - 312)
Report of the Director of Regeneration and Economy
7. **Transport Capital Programme 2026/27** (Pages 313 - 336)
Report of the Interim Director of City Services
8. **Coventry Climate Adaptation & Resilience Plan (2026 - 2030)** (Pages 337 - 388)
Report of the Director of Regeneration and Economy
9. **Outstanding Issues**
There are no outstanding issues

10. **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

None

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

Monday, 9 March 2026

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

Membership

Cabinet Members:

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

Non-voting Deputy Cabinet Members:

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

By invitation:

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

Public Access

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**Lara Knight, Governance Services,
Email: lara.knight@coventry.gov.uk**

Coventry City Council
Minutes of the Meeting of Cabinet held at 10.00 am on Tuesday, 24 February 2026

Present:

Members: Councillor G Duggins (Chair)
Councillor AS Khan (Deputy Chair)
Councillor N Akhtar
Councillor L Bigham
Councillor R Brown
Councillor K Caan
Councillor P Hetherton
Councillor J O'Boyle
Councillor P Seaman
Councillor K Sandhu

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

Non-Voting Opposition
Members: Councillor S Gray

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

Employees (by
Directorate):

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

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

Policy and
Communications C Holloway

Apologies: Councillor F Abbott
Councillor L Kelly
Councillor E Reeves
Councillor G Ridley

Public Business

65. Declarations of Interest

There were no disclosable pecuniary interests.

66. **Minutes**

The minutes of the meeting on 10th February 2026 were agreed and signed as a true record. There were no matters arising.

67. **Council Tax Setting Report 2026/27**

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 24th February 2026, that calculated the Council Tax level for 2026/27 and made appropriate recommendations to Council, consistent with the Budget Report 2026/27.

The report recommended a 3.9% increase in the City's Council Tax. Some figures and information, shaded grey in the report, were necessarily provisional due to precepts not having been confirmed at the time of publication.

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 2026/27 Band D Council Tax that was calculated through this process had increased by £82.98 from the 2025/26 level.

Each year the Government determined the maximum Council Tax increases that local authorities could set without triggering a referendum. For 2026/27, Coventry City Council's Council Tax must be below 5%, as set out in the Secretary of State's principles for 2026/27, comprising a 2% precept for expenditure on adult social care and a maximum of 3% for other expenditure. The recommendations within the Budget Report 2026/27 were based on a proposed increase in Council Tax of 3.9%, incorporating a core Council Tax rise of 2.9% and a 1% Adult Social Care Precept.

At the time of writing this report the precept from the Police and Crime Commissioner and the precept from the Fire and Rescue Authority had not been confirmed. The provisional figures provided in this report were based on indicative figures. The figures detailed in the recommendations below were subsequently confirmed as the final figures, at the meeting.

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 recommend to Council the approval of recommendations (1) to (5) below:

(1) To note the following Council Tax base amounts for the year 2026/27, as approved by Cabinet on 6 January 2026, in accordance with Regulations made under Section 31B of the Local Government Finance Act 1992 ("the Act"):

a) 91,413.3 being the amount calculated by the Council as its Council Tax base for the year for the whole Council area;

b)

Allesley	498.7
Finham	1,587.2
Keresley	744.4

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

(2) That the following amounts be now calculated by the Council for the year 2026/27 in accordance with Sections 31A, 31B and 34 to 36 of the Act:

(a) £1,035,300,800 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(2) of the Act taking into account all precepts issued to it by Parish Councils (Gross Expenditure and reserves required to be raised for estimated future expenditure);

(b) £835,376,768 being the aggregate of the amounts that the Council estimates for the items set out in Section 31A(3) of the Act. (Gross Income including reserves to be used to meet the Gross Expenditure but excluding Council Tax income);

(c) £199,924,032 being the amount by which the aggregate at (2)(a) above exceeds the aggregate at (2)(b) above, calculated by the Council in accordance with Section 31A(4) of the Act, as its Council Tax requirement for the year;

(d) £2,186.40	$\frac{(2)(c)}{(1)(a)} = \frac{£199,924,032}{91,413.3}$

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

(e) £57,993 being the aggregate amount of all special items referred to in Section 34(1) of the Act. (Parish Precepts);

$$(f) \text{ £2,186.40} = (2)(d) - \frac{(2)(e)}{(1)(a)} = \text{£2,186.40} - \frac{\text{£57,993}}{91,413.3}$$

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

(g)

Coventry (unparished area)	£2,186.40
Allesley	£2,226.65
Finham	£2,199.94
Keresley	£2,208.48

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	1,457.60	1,484.43	1,466.63	1,472.32
B	1,700.53	1,731.84	1,711.06	1,717.70
C	1,943.47	1,979.25	1,955.51	1,963.10
D	2,186.40	2,226.65	2,199.94	2,208.48
E	2,672.27	2,721.46	2,688.82	2,699.26
F	3,158.13	3,216.27	3,177.69	3,190.02
G	3,644.00	3,711.08	3,666.57	3,680.80
H	4,372.80	4,453.30	4,399.88	4,416.96

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 2026/27 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	163.00	56.79
B	190.17	66.26
C	217.33	75.73
D	244.50	85.19
E	298.83	104.12
F	353.17	123.05
G	407.50	141.99
H	489.00	170.38

- (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 2026/27 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	1,677.39	1,704.22	1,686.42	1,692.11
B	1,956.96	1,988.27	1,967.49	1,974.13
C	2,236.53	2,272.31	2,248.57	2,256.16
D	2,516.09	2,556.34	2,529.63	2,538.17
E	3,075.22	3,124.41	3,091.77	3,102.21
F	3,634.35	3,692.49	3,653.91	3,666.24
G	4,193.49	4,260.57	4,216.06	4,230.29
H	5,032.18	5,112.68	5,059.26	5,076.34

(5) That the Council determines that its relevant basic amount of Council Tax for 2026/27 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.

68. Budget Report 2026/27

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 24th February 2026, that followed on from the Pre-Budget Report approved by Cabinet on 16th December 2025 (minute 44/25 referred) which has since been subject to a period of public consultation. The proposals within the report now formed the basis of the Council's final revenue and capital budget for 2026/27 incorporating the following details:

- Gross budgeted spend of £1,035.3m (£73.5m higher than 2025/26).
- Net budgeted spend of £422.9m (£126.0m higher than 2025/26) funded from Council Tax, Business Rates and Business Rates top-up of £56.5m due to the 2026/27 impact of the Fair funding redistribution.
- A Council Tax Requirement of £199.9m (£10.4m or 6% higher than 2025/26), reflecting a City Council Tax increase of 3.95% detailed in the separate Council Tax Setting report on today's agenda.
- A number of new expenditure pressures, policy investments and technical savings proposals.
- A Capital Strategy including a Capital Programme of £165.9m including expenditure funded by Prudential Borrowing of £33.9m.
- An updated Treasury Management Strategy, Capital Strategy, and a Commercial Investments Strategy.
- Amendments to the Council Tax Support Scheme.

The financial position in this Budget Report was based on the Final 2026/27 Local Government Finance Settlement published on 9th February 2026. This settlement was a result of the implementation of the Fair Funding systems, Council Tax equalisation and Business Rates reset. This settlement included a multi (three) year settlement which took the Authority through to the end of the current CSR (comprehensive spending review) period of March 2029.

This 3-year settlement enabled a much better medium-term view of the Council's finances from a resource perspective. The Government would reserve the right to review allocations each year, but indicative allocations would allow Councils to plan more effectively. Demographic pressures were still expected to continue to increase as cost-of-living issues continued to affect individuals' experience and expectations of when local authorities and Government would intervene to protect them. The next 3 years would continue therefore to create a very challenging environment in which the City Council would need to ensure Government funding together with local taxation decisions were sufficient to cover existing cost and emerging pressures including inflation.

In response the additional resources received by Coventry in the Final settlement and in conjunction with the consultation responses, final proposals within the Budget Report proposed a Council Tax increase of 3.95%. This incorporated a 2.95% Council Tax increase plus a further 1% Adult Social Care (ASC) Precept.

The precept was 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 £1.48 a week for a typical Coventry household including the expected rises in the precepts for Police and Fire.

At the point of the pre-budget stage, reported to Cabinet in December 2025, the 2026/27 settlement and the impact of the Fair Funding review were not known. However, sector intelligence indicated that the local impact would be positive such that no new savings proposals would be required for 2026/27, and financial headroom could potentially be available such that some form of policy investment might be possible.

On this basis, Cabinet approved a consultation process which sought views on investment options across 7 key Strategic themes. Proposals within this 2026/27 Budget report have been categorised into these themes. Table 2 in Section 2.2 to the report summarised the resourcing position, expected pressures and technical savings, together with policy proposals for which approval was sought by Council.

The detail of these proposals was set out in Appendix 2 to the report. The proposals provided the Council with a balanced budget for 2026/27 as well as headroom to make strategic policy decisions that would support and enhance the city in future years. The Council's current medium term bottom line incorporated a combination of future inflationary and service pressures and the fall-out of some specific grant resources. Some of the future pressure and income assumptions were estimated at this stage.

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 use resources and manage costs pressures whilst focussed on its key strategic priorities over the medium term.

The recommended Capital Programme proposals were a key part of the Council's approach and amounted to £165.9m in 2026/27. 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 London Road corridor transport packages, the construction and operation of The Coventry Very Light Rail 800m long twin-track 'City Centre Demonstrator (CCD)' from the main Coventry Rail Station to the Coventry University Technology Park; the continuation of City Centre Cultural Gateway; continued implementation of the City Centre South redevelopment; and the completion of Woodlands School. Over the next 5 years the Capital Programme was estimated at a total of £437m as part of on-going investment delivered by and through the City Council.

The report also 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 the 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 recommend to Council the approval of recommendations 1) to 9) below:

- 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 to the report and the Equality Impact Assessment set out in Appendix 10 to 31 to the report.**
- 3) Approve the total gross 2026/27 revenue budget of £1,035.3m in Table 1 of the report and Appendix 3 to the report, established in line with a 3.9% City Council Tax increase and the Council Tax Requirement recommended in the Council Tax Setting Report 2026/27.**
- 4) Note the Director of Finance and Resources (Section 151 Officer) comments confirming the adequacy of reserves and robustness of the budget in Section 5.1.4 and 5.1.5 of the report.**
- 5) Approve the Capital Strategy incorporating the Capital Programme of £165.9m for 2026/27 and the forward commitments arising from this programme totalling £437m between 2026/27 to 2030/31 detailed in Section 2.3 of the report and Appendix 4 to the report.**
- 6) Approve the addition to the Capital Programme of a new Capital Scheme for the delivery of Temporary Accommodation and Resettlement properties at a total cost of £9.2m. Funded from the acceptance of the capital grant of £4.9m from the Ministry of Housing, Communities and Local Government (MHCLG) specifically for the delivery of the Local Authority Housing Fund tranche 4 (LAHF) Scheme; £1.2m funded from capital receipts; and £3.1m revenue funding as part of the proposed policy priorities in this report: Increasing Family Temporary Accommodation provisions in Appendix 2 (lines 38 and 39) to the report and detailed in Section 2.3.4 of the report.**

- 7) **Approve the award of a £2.3m capital grant from the Temporary Accommodation Programme (Recommendation 6) above) to a Registered Social Landlord (RSL) to deliver 19 properties for resettlement and delegate authority to the Director of Care, Health and Housing, following consultation with the Director of Finance and Resources and the Cabinet Member for Housing and Communities, to undertake such action as is deemed necessary to bring into effect this recommendation as referenced in Section 2.3.4 of the report.**
- 8) **Approve the Council's Treasury Management Strategy and Minimum Revenue Provision Statement for 2026/27 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 2026/27 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.**
- 9) **Approve amendments to the Council Tax Support Scheme following the 6-week consultation period, as detailed in Section 2.6 of the report and Appendix 9 to the report, and in accordance with The Local Government Finance Act 1992 (as substituted by the 2012 Act).**

69. **Outstanding Issues**

There were no outstanding issues.

70. **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 10.05am)

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Public report

Cabinet

Cabinet
Council

17th March 2026
24th March 2026

Cabinet Member Portfolio:

Cabinet Member of Policing and Equalities
Cabinet Member for Housing and Communities

Director approving submission of the report:

Director of Law, Governance and Safer Communities.

Ward(s) affected:

All

Title:

Private Sector Housing Enforcement Policy 2026-2031

Is this a key decision?

No

Executive summary:

On the 27th of October 2025 the Renters Rights Act (hereafter the Act) received royal assent with the aim of improving the experience of private renting.

The Act introduces a new suite of powers for the Council that will come into force on the 1st May 2026 underpinned by new powers designed to be effective, consistent and proportionate enforcement framework.

The Government has also extended councils' powers to collect and retain revenue for future enforcement work from financial penalties against landlords who flout the rules.

In order for the Council to use these powers it must have published a policy setting out how it will implement these powers in relation to properties in the Private Rented Sector (PRS). This report therefore seeks approval of the attached "Private Sector Housing Enforcement Policy 2026 -2031".

The Policy is being presented to Cabinet and Council. If approval is given, the Policy will take effect from the 1st of May 2026.

Recommendations:

Cabinet is recommended to:

- (1) Consider the requirements of the Renters Rights Act 2025 and approve the proposed Coventry Private Sector Housing Enforcement Policy 2026 -2031.
- (2) Authorise the Director of Finance and Resources (Section 151) to accept any future monies associated with New Burdens funding and income from the PRS Database once these have been confirmed by Government.
- (3) Authorise the Director of Law, Governance and Safer communities to amend the scheme of delegations to include any new powers and duties arising as a result of the Renters Rights Act 2025.
- (4) Request that the policy be reviewed by full Council for approval.

Council is recommended to:

- (1) Consider the requirements of the Renters Rights Act 2025 and approve the proposed Coventry Private Sector Housing Enforcement Policy 2026-2031.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Private Sector Housing Enforcement Policy 2026-2031

Appendix 2 – Equality Impact Assessment

Background papers:

None

Other useful documents

Renters Rights Act 2025

Housing Act 2004

Housing and Planning Act 2016

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 – 24th March 2026

Report title: Private Sector Housing Enforcement Policy 2026-2031

1. Context (or background)

- 1.1. The Renters' Rights Act received Royal Assent on Monday the 27th of October 2025. It provides a commitment to transform the experience of private renting and give renters much greater security and stability so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness.
- 1.2. On the 13th of November 2025 the Government introduced its roadmap which provides an overview of the phases of implementation for the various provisions under the Act.
- 1.3. Phase 1, which commenced on the 27th of December 2025, provided the Council with new powers to investigate whether landlords or letting agents in the PRS have breached specific housing laws. The 'Investigatory powers guidance for Renters' Rights Act 2025' sets out which powers can be used and authorised officers must ensure the powers are applied appropriately. They may be used to support investigations when officers suspect certain legal breaches have occurred and include:
 - Entering business premises to seize documents
 - Requesting information from people or organisations
 - Entering residential properties (with special authorisation).
- 1.4. The remainder of Phase 1 of the Act will come into force from the 1st of May 2026, and will introduce the following:
 - The abolishment of section 21 'no fault' evictions in the PRS. The abolition of section 21 and tenancy reforms during Phase 1 will not apply initially to the social rented sector. This will happen during Phase 2 (late 2026).
 - Assured Periodic Tenancies in the PRS – the vast majority of new tenancies and existing tenancies in the PRS will become Assured Periodic Tenancies. This means tenants will be able to stay in their property for as long as they want, or until a landlord serves a valid Section 8 Notice. Tenants will be able to end their tenancy by giving two months' notice.
 - Reform possession grounds in the PRS so they are fair for both parties – landlords will only be able to evict tenants when they have a valid reason. Possession grounds will be extended to make it easier for landlords to evict tenants who commit anti-social behaviour, or who are in serious persistent rent arrears.
 - Limit rent increases to once a year in the PRS – landlords will have to follow the revised Section 13 procedure and provide the tenant with a Notice detailing the proposed rent increase at least two months before it is due to take effect.
 - Ban rental bidding and rent in advance – landlords and letting agents will not be able to ask for, encourage, or accept an offer that is higher than the advertised rent. Landlords and agents will also not be able to request more than one month's rent in advance.

- Make it illegal to discriminate against renters who have children or receive benefits – landlords and letting agents will not be able to do anything to make a tenant less likely to rent a property (or prevent them from renting it) because they have children or receive benefits. This includes withholding information about a property (including its availability), stopping someone from viewing it, or refusing to grant a tenancy.
- Require landlords in the PRS to consider tenant requests to rent with a pet – landlords will have an initial 28 days to consider their tenant's request, and they will have to provide valid reasons if they refuse it.
- Strengthen both local council enforcement and rent repayment orders - civil penalties will be expanded, and there will be a new requirement for local councils to report on enforcement activity. Rent Repayment Orders will be extended to superior landlords, the maximum penalty will be doubled, and repeat offenders required to pay the maximum amount.
- New investigatory powers giving local councils a stronger ability to inspect properties, demand documents, and access third-party data to crack down on rogue landlords and enforce housing standards more effectively.

- 1.5. Phase 2 of the Act will be introduced in two key stages from late 2026.
- 1.6. Stage 1 of Phase 2 will see a regional roll out of the Database for Landlords. Signing up to the PRS Database will be mandatory for all PRS landlords and they will be required to pay an annual fee which will be confirmed closer to launch. Regulations will mandate landlord registration, payment of a fee and the provision of key information by landlords.
- 1.7. Stage 2 of Phase 2 will include further roll out of the Database and the introduction of the Ombudsman service. Public access and data sharing will be enabled following the launch of landlord registration.
- 1.8. The Ombudsman will provide a redress service for PRS tenants when things go wrong. It will also support landlords with tools, guidance and training on handling complaints from tenants early. The Ombudsman scheme will be mandatory for PRS landlords. Landlords will be required to fund the service through a fair and proportionate charging model, confirmed closer to launch. The development of the Ombudsman will happen in stages:
 - Stage 1 will happen at least 12-18 months before implementation. The Secretary of State will choose a scheme administrator to run the new service, which will then need time to scale up.
 - Stage 2 will require landlords to be members of the new service – this is expected to be in 2028, when the Secretary of State is confident the service is ready for delivery.
- 1.9. Phase 3 will see the introduction of a new Decent Homes Standard (DHS) which will apply to all privately rented properties for the first time. The new DHS will apply from 2035 in both the social and private rented sectors, at which point regulation and enforcement against these standards in relation to the PRS will sit with the Council.

1.10. As an overview, the new DHS will require:

Criterion A – A home must be free of ‘category 1’ hazards, as assessed under the Housing Health and Safety Rating System (HHSRS).

Criterion B – A home must be in a reasonable state of repair.

Criterion C – A home must provide core facilities and services.

Criterion D – A home must provide a reasonable degree of thermal comfort. This includes ensuring homes meet Minimum Energy Efficiency Standards EPC C.

Criterion E – A home should be free of damp and mould.

1.11. In addition to the introduction of the DHS the Government will also extend Awaab’s Law to apply to privately rented properties.

1.12. In order for the Council to proceed with implementing the powers provided under the Renters Rights Act it must first have published a policy. If approved these powers will take effect in line with the commencement dates set out by Government and the Act.

1.13. **The Private Sector Housing Enforcement Policy 2026-2031**

1.13.1. The Private Sector Housing Enforcement Policy provided in Appendix 1 sets out the Council’s strengthened approach to enforcing housing standards across the PRS and Social Housing (SH). It incorporates updated legislation, particularly the Renters’ Rights Act 2025, and aims to ensure all rented homes meet statutory minimum standards to protect residents’ health and wellbeing and can be summarised as follows:

Clear Legal Framework

The policy aligns enforcement activity with a wide range of legislation including the Housing Acts, Housing & Planning Act 2016, Renters’ Rights Act 2025, and multiple safety regulations.

Proportionate Enforcement Approach

Encourages early informal engagement with landlords.

Escalates to formal action where landlords fail to act, where risks to health exist, or where behaviour is deliberate or repeated.

Tools include civil penalties (up to £40,000), simple cautions, prosecution, and management orders.

Civil Penalties Framework

A detailed, structured penalties matrix outlines:

- Starting points for offences;
- Factors influencing penalty levels (severity, culpability, harm, aggravating/mitigating factors); and
- Representations process and appeals.

This ensures consistency and transparency in enforcement.

Safeguarding & Vulnerability

The policy includes specific measures for hoarding and severely dilapidated homes, recognising the needs of vulnerable residents and enabling multi-agency responses.

Clear Expectations for Landlords & Tenants

Landlords and agents must demonstrate legal competence, proper management, and timely repairs.

Tenants must initially raise concerns directly and act in a “tenant-like manner”.

Monitoring & Review

Annual review aligned with legislative updates.

Commitment to staff training, public communication, and promoting landlord accreditation schemes.

2. Options considered and recommended proposal

2.1. There are two options to consider:

- a) **Do nothing** - This option is not recommended because this option would prevent the Council from enforcing its statutory duties under the Renters Rights Act 2025.
- b) **Approve the policy – This is the preferred option.** Without this the Council cannot use the new powers. Therefore, Cabinet is requested to approve the Private Sector Housing Enforcement Policy 2026-2031 and the approach to dealing with the implementation of the new powers as detailed in the report. This will ensure legal compliance with the Renters Rights Act 2025.

3. Results of Consultation

- 3.1. The Renters Rights Act as set out in the policy has been subject to national consultation by the MHCLG and the results of this have been taken into consideration by Government when developing the new legislation and associated guidance provided to Local Authorities for implementing these new powers. There is no statutory requirement to consult further on the measures set out in the policy.
- 3.2. Landlord and Agents have been notified of the pending changes being introduced through the Council’s Landlord Accreditation Scheme, Landlord Newsletter and in emails. Further communications will be rolled out periodically to all stakeholders to ensure they understand the new powers and the implications.
- 3.3. The Council is also currently working with external advice services, such as the CAB and Coventry Law Centre to ensure renters are aware of the changes being introduced by the Act.
- 3.4. A series of briefing notes have been provided to Cabinet Members, and an overview of the Renters Rights Act was presented to the Communities and Neighbourhoods Scrutiny Board (4) on the 19th of December 2025. In addition, an all-Member seminar was carried out on the 9th of February 2026.

4. Timetable for implementing this decision

- 4.1. The policy must be approved and published to allow the Council to implement the new powers. If approved, it is proposed that the policy takes immediate effect, which will enable the Council to use the investigatory powers introduced on the 27th of December 2025 and be prepared to use the remaining powers which have a fixed implementation date of the 1st of May 2026.
- 4.2. During this period between publishing the new policy and the 1st of May 2026 the Council will need to maintain the use of existing powers prior to the introduction of the Renters Rights Act 2025 and as such the Council will carry out any such enforcement in accordance with the existing Policy on Enforcing Standards in Private Sector Housing 2020.
- 4.3. Any enforcement cases commenced on or after the 1st of May 2026 will be done so in line with this new policy – the Private Sector Housing Enforcement Policy 2026-2031.
- 4.4. The Private Sector Housing Enforcement Policy will be reviewed and amended (if necessary) before the end of 2031.

5. Comments from the Chief Operating Officer (Section 151 Officer) and the Director of Law, Governance and Safer Communities.

5.1. Financial Implications

- 5.1.1. The Ministry of Housing, Communities and Local Government (MHCLG) has indicated it will provide a total of £18.2 million of New Burdens funding in 2025/2026 to help local authorities in England cover familiarisation costs and prepare for their new enforcement responsibilities; make necessary changes to IT systems for new data collection requirements; and recruit and deploy additional staff resource for PRS enforcement.
- 5.1.2. Funding allocations for local authorities are determined according to the number of private rented sector properties in each area, utilising data from the 2021 census. The Council has received its Grant Determination letter under Section 31 of the Local Government Act 2003, confirming an award of £126k for this period. Although this funding is unlikely to fully meet all costs associated with delivering the requirements, the Service had already accounted for these expenses in its budget planning. As a result, any shortfall will be absorbed and managed within the existing financial resources.
- 5.1.3. The Government is expected to confirm additional New Burdens funding for the financial year 2026/27, with an announcement anticipated in early 2026, ahead of the commencement of Phase 1 of the Renters' Rights Act. This ongoing commitment to New Burdens funding aims to support local authorities in meeting the evolving demands associated with private rented sector (PRS) enforcement.
- 5.1.4. In future years, the Government remains committed to establishing a sustainable funding system for PRS enforcement. This approach will be underpinned by

revenues generated from PRS Database fees, ensuring that enforcement activities are adequately resourced over the long term.

- 5.1.5. The Service will continue to manage delivery costs within the framework of the additional funding provided. Should there be any funding shortfall, these costs will be reviewed and managed accordingly.
- 5.1.6. The Council has also received approx. £125k funding from West Midlands Combined Authority to appoint 2 new apprenticeship posts for a period of two years to assist in the enforcement of the Act. These apprentice posts have been developed to enable the service to “grow their own” which provides a sustainable option for future resources.

5.2. Legal Implications

- 5.2.1. Section 107 of the Renters Rights Act 2025 places a statutory duty on every local housing authority to enforce the landlord legislation within its area.
- 5.2.2. This is new in the Renters’ Rights Act, as prior to this the Council only had a “power” to enforce landlord legislation within its area. Enforcement will therefore change from discretionary to mandatory, substantially increasing the Councils’ obligations. Adoption and publication of the Private Sector Housing Enforcement Policy 2026-2031 is therefore necessary to discharge the authority’s duty.
- 5.2.3. The Private Sector Housing Enforcement Policy attached at Appendix 1 sets out the Council’s approach to fulfilling this duty in a way that will ensure consistency and transparency.

6. Other implications

6.1. 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 Safer Housing and Communities service is to support and protect tenants, residents and communities.

The Safer Housing and Communities service work together to:

- Prevent offending
- Managing and changing the behaviour of offenders

- Reduce crime
- Minimising the risk of harm to vulnerable people
- Support victims
- Protect communities
- Protect locations from crime and make housing safer.

The Safer Housing and Communities service supports the priorities of the Regulatory Services Operational Plan.

6.2. How is risk being managed?

In accordance with the Renters Rights Act 2025, the Council is obligated to enforce the landlord legislation in its area. This policy will ensure a coordinated and consistent approach to enforcement.

The policy will inform decisions taken by Safer Housing and Communities service that will have an impact on the interests of private landlords, agents and tenants. The policy follows the principles of enforcement set out in the Council's overarching Regulation, Communities and Environmental Enforcement Policy 2024 and therefore reflects the need to respect the relevant rights given by the Human Rights Act.

Decisions of the Safer Housing and Communities service are open to challenge through the First Tier Property Tribunal and in certain cases the Magistrates Court and beyond. The policy is designed to ensure the Council's compliance with legislation and statutory guidance, minimising the risk of legal challenge.

6.3. What is the impact on the organisation?

The Safer Housing and Communities service was the subject of a restructure in 2025 to respond to the proposed changes in service needs and to ensure the appropriate skills, expertise and capacity exists within the service to deliver against future objectives.

With the introduction of the Renters Rights Act 2025 there is a greater emphasis on the Council to comply with the legal duty to enforce the legislation and there are further plans by Government to roll out additional powers.

Although the Safer Housing and Communities service has restructured to plan ahead as the legislation is introduced there may be potential human resource and financial implications.

These will be monitored and reviewed regularly, and where possible mitigated through the use of New Burdens funding and income from civil penalties, which are specifically ringfenced for functions in the private rented sector. The current duties will be carried out using existing resources.

6.4. Equalities / EIA?

The report makes links to the Council's Equalities and Diversity Policies. An Equality Impact Assessment has been completed and is attached at Appendix 2 of the report.

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

The Safer Housing and Communities service tackle place-based issues and through its enforcement activities it supports improving this objective.

6.6. Implications for partner organisations?

The Safer Housing and Communities service will work collaboratively with Coventry City Council its partner organisations to ensure the policy is implemented consistently.

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Private Sector Housing Enforcement Policy 2026-2031



Coventry City Council

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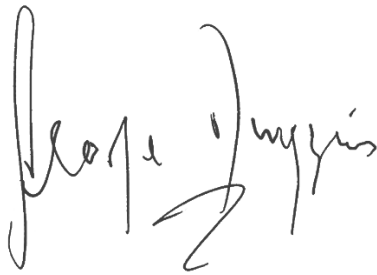
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Foreword

“Having a robust and effective policy for enforcing standards in privately rented properties and social housing is fundamental to our city’s wellbeing. By strengthening our approach, we are not only improving living conditions for residents but also ensuring higher standards of property management. This benefits tenants by providing safer, healthier homes, while landlords gain from greater clarity and a more positive reputation in the community.”

Leader of Coventry City Council

Councillor George Duggins.

A handwritten signature in black ink, reading "George Duggins". The signature is fluid and cursive, with the first name "George" and the last name "Duggins" clearly distinguishable.

Executive Summary

This policy outlines Coventry City Council's position on dealing with issues in the Private Rented Sector (PRS) and Social Housing (SH) with details of the legislation and guidance on which its approach is based.

The policy supports a clear commitment to safeguarding housing conditions and the prevention of wider environmental issues by ensuring that all privately rented properties and social housing in Coventry meet the statutory minimum standards.

The purpose of the review has been to incorporate new legislation, particularly the Renters' Right Act 2025.

Description of Amendment(s)

Supersedes the Council's Policy on Enforcing Standards in Private Sector Housing following the inclusion of provisions introduced under the Renters' Rights Act 2025 and amendments affecting other relevant legislation.

This policy will impact on

Tenants, Landlords and businesses involved in the letting and management of properties in the Private and Social Rented Sectors in Coventry.

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1 Introduction

Coventry City Council considers the protection of public health paramount and is therefore committed to ensuring that all privately rented properties and social housing in Coventry meets minimum standards.

The Council commits to working with owners, private and social landlords, letting agents and tenants to safeguard housing conditions and prevent wider environmental issues arising from rented homes in Coventry.

The Council will support statutory compliance by:

1. Facilitating the administration and enforcement of both the mandatory and discretionary additional licensing schemes for prescribed Houses in Multiple Occupation (HMOs).
2. Undertaking inspections and audits.
3. Providing advice and education to landlords and agents, helping them to reduce issues and raise housing standards, and,
4. Serving statutory notices against landlords who fail to comply with their legal requirements.

Coventry City Council recognises and affirms the importance of achieving and maintaining consistency in its approach to making decisions that concern regulatory enforcement action, including prosecution.

In deciding upon enforcement options, each case will be investigated and judged on its own merits.

Any enforcement taken will be proportionate to the risk presented and decided upon in accordance with:

1. Official statutory guidance provided by Government.
2. Better Regulation Delivery Office - [Regulators' Code](#)
3. Coventry City Council's Enforcement Policy [Coventry City Council – Regulation, Communities and Environmental Enforcement Policy – Coventry City Council](#), and,
4. The Code of Crown Prosecutors evidential and public interest tests [The Code for Crown Prosecutors | The Crown Prosecution Service](#).

The Council will also have due regard for relevant non statutory guidance provided by Government and relevant Council procedures, unless inappropriate in the circumstances.

The [Regulators' Code](#) was introduced in 2014 and gives direction on how enforcement bodies must approach the enforcement of the laws to which it applies.

- This requires a supportive, informal approach first, with legal action normally only following if such an approach hasn't been effective.
- The Renters' Rights Act is predicated on an 'enforcement first approach' – see [Guidance](#)

The list of laws to which the Regulators' Code applies are in schedules to the [The Legislative and Regulatory Reform \(Regulatory Functions\) Order 2007](#)

- The housing legislation to which it **does apply** is:
 - [Parts 8, 9 and 10](#) of the Housing Act 1985 – (Area Improvement, Slum Clearance, Overcrowding)
 - [Part 8](#) of the Housing Act 1996 – (Miscellaneous and general provisions)
 - [Parts 2 to 5](#) of the Housing Act 2004 – (HMO and other licensing, management orders)
- It **does not** apply to:
 - The Renters' Rights Act 2025 itself
 - The 'landlord legislation' listed in S107(5) of that Act
 - [Part 1 of the Housing Act 2004](#) – (Housing conditions and HHSRS)

The Council takes the enforcement of conditions in the Private Rented Sector (PRS) and Social Housing (SH) extremely seriously. Where it is considered to be necessary and proportionate, the Council will use its enforcement powers to full effect.

2 Purpose

This policy details how the Council will enforce the legislation it has available to it to deal with issues in the PRS and SH sectors.

Should the Council pursue legal proceedings or if an enforcement action is to be appealed against for example, this policy provides a reliable point of reference.

3 Legal Framework

This policy incorporates the provisions for Coventry City Council to enforce and exercise its duties as a Local Housing Authority, determined by the following Acts and Regulations:

[Housing Act 1985.](#)

[Housing Act 1988.](#)

[Housing Act 2004.](#)

[Housing and Planning Act 2016.](#)

[Supported Housing \(Regulatory Oversight\) Act 2023.](#)

[Renters' Rights Act 2025.](#)

[Protection from Eviction Act 1977.](#)

[Environmental Protection Act 1990.](#)

[Building Act 1984.](#)

[Prevention of Damage by Pests Act 1949.](#)

[The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector \(England\) Regulations 2020.](#)

[The Energy Efficiency \(Private Rented Property\) \(England and Wales\) Regulations 2015.](#)

[The Smoke and Carbon Monoxide Alarm \(Amendment\) Regulations 2022.](#)

[Tenant Fees Act 2019.](#)

[The Client Money Protection Schemes for Property Agents \(Requirement to Belong to a Scheme etc.\) Regulations 2019.](#)

[Consumer Rights Act 2015.](#)

[Local Government \(Miscellaneous Provisions\) Act 1976.](#)

[Local Government \(Miscellaneous Provisions\) Act 1982.](#)

[Public Health Act 1936.](#)

[Public Health Act 1961.](#)

[Local Government and Housing Act 1989.](#)

[Local Government Act 1972.](#)

[Immigration Act 2014.](#)

[Caravan Sites and Control of Development Act 1960.](#)

[The Redress Schemes for Lettings Agency Work and Property Management Work \(Requirement to Belong to a Scheme etc\) \(England\) Order 2014.](#)

5 Roles and Responsibilities

Authorised Officers of the Council

All authorised officers of Coventry City Council must have regard to this policy and make enforcement decisions in accordance with statutory guidance and the Council's procedures.

Landlords and Letting Agents

The Council considers those responsible for letting and managing property a business. Landlords and letting agents of privately rented accommodation and social housing are therefore expected by the Council to:

1. Have a good understanding of the duties and responsibilities placed upon them by the various legislation in respect to housing standards and management issues.
2. Conduct their business in a professional manner with a reasonable level of skill and application of the requirements.

Landlords and agents may refer to the Council's guide to minimum property standards [HMO licensing – Coventry City Council](#) and to liaise with Council Officers or other professionals to confirm the extent to which additional requirements apply to any addresses let out as Houses in Multiple Occupation (HMOs).

Tenants

The Council expects tenants to act in a 'tenant-like manner'; the term 'tenant-like manner' comes from the judgement of Lord Denning in *Warren v Keen* 1953 where Lord Denning said:

"The tenant must take proper care of the place. In short, he must do the little jobs around the place which a reasonable tenant would do. In addition, he must not, of course, damage the house wilfully or negligently... but apart from such things, if the house falls into disrepair through fair wear and tear or lapse of time or for any reason not caused by him, the tenant is not liable to repair it".

6 Approach to Enforcement

Concerns about housing conditions may be raised via a complaint made to the Council by a tenant or another member of the public, identified on a Council visit to the property, or discovered as part of an audit or other investigation.

Generally, wherever possible, it is the Council's preference that landlords are first given the opportunity to investigate any reported problems at their properties.

Tenants are therefore advised to initially put their complaint in writing to the landlord to:

- a) highlight the alleged deficiencies,
- b) request that the complaint be investigated, and
- c) call for the necessary remedial action to be taken.

The Council expects landlords to respond to the concerns of their tenants within 21 days and undertake any necessary repairs and improvements thereafter, without the need for the Council to intervene.

Where the landlord has failed to respond, or not resolved the issues raised by the tenant the Council will consider this as the informal stage and contact the tenant to establish the nature of the concern, obtain details of the disrepair present and decide on the most appropriate course of action.

The Council may arrange to visit the property, and further visits may be required to assess if the necessary work has been completed

Depending on the circumstances of the case, there are a number of courses of action the Council may decide to take, these include:

No Action - No action will be taken when premises are found to be satisfactory

Informal Action - In most cases when minor deficiencies are identified, an informal approach of providing written or verbal advice to the landlord may be deemed sufficient.

Formal Action - Coventry City Council will consider formal action where:

- There is a strict liability to comply and a risk to public health exists.
- There is a blatant or deliberate contravention of the law.
- There is a history of non-compliance, or cooperation for an informal approach is not forthcoming.
- Action agreed as part of an informal process is not being progressed within agreed timescales.

The enforcement options available to the Council vary in line with the appropriate legislation or regulation as detailed in the appendices to this policy.

Powers of Entry and Power to Require Information

The Council has various powers to enter properties at any reasonable time to carry out its duties in accordance with legislation and to require the production of documents.

All Officers conducting investigations and using the powers to require documents to be produced are authorised to do so by the Council for these purposes.

If admission is refused, premises are unoccupied or prior warning of entry is likely to defeat the purpose of the entry, then the Council may decide to make an application for a warrant in the Magistrates Court. A warrant includes the power to enter by force, if necessary.

7 Hoarding and Dilapidated Properties

These properties are often occupied by vulnerable persons, sometimes with mental health issues or elderly people struggling to cope.

There has been an increased awareness of the issue brought about by publicity and media exposure and a corresponding rise in the number of reports from neighbours and health visitors regarding issues of disrepair, lack of hygiene or accumulations within properties.

While these properties are usually owner occupied, the Council has powers under legislation to take action where:

- The situation is likely to cause harm or ill health to the occupier.
- There is a wider health issue or where statutory nuisance may exist.

The cases that come to light are prioritised and referred to other agencies as necessary, particularly when there are safeguarding issues. Known cases are kept under review.

Enforcement action will be taken when necessary to protect public health, but the Council will primarily seek to provide signposting to assistance and engage with the relevant agencies to help them deal with any underlying issues.

8 Civil Penalties

On the 27th October 2025 the Renters Rights Act amended the powers to impose [Civil penalties under the Renters' Rights Act 2025 and other housing legislation - GOV.UK](#) to increase the maximum value to £40,000 as an alternative to prosecution for certain specified offences.

Civil Penalties can be seen as an effective method of disposal and alternative to criminal prosecution. A civil penalty may provide both a deterrent to lack of compliance or punitive approach that may lead to future compliance. This in turn will help to drive up standards within the sector by punishing the minority of bad landlords and providing a clear framework for those landlords or agents who are competent and invested in complying with the regulations.

Coventry City Council view landlords as a business regardless of portfolio size. Providing a home to rent for another person is providing a service to that person or consumer. Landlords should therefore be bound by the expectation that the business should be conducted with the reasonable care and skill that is seen in other industry sectors. Civil penalties can help businesses who breach the

legislation in reducing the likelihood of the reputational harm that may arise from criminal prosecution whilst aiming to achieve compliance.

The Council also does not aim to criminalise all landlords and property professionals and recognises that there are a group of landlords who persistently break housing law, operate properties that cause harm to tenants and deliberately engage in behaviour to try and avoid complying with their responsibilities. The Council would define these landlords as “rogue” landlords, which distinguishes them from landlords who break the rules occasionally or accidentally and are amenable to changing their ways. For these landlords the maximum penalty levels will be considered and criminal prosecution reserved for repeat offenders where the legislation permits.

The Council is under a duty to enforce the landlord legislation under section 107 of the Renters’ Rights Act 2025. This defines taking enforcement action as, imposing a financial penalty or instituting proceedings against a person for an offence in their area.

Civil penalties are likely to be used in most cases; however, the Council will make all enforcement decisions on a case-by-case basis dependant on the individual facts, with all statutory options remaining available.

The term ‘breach’ is used to refer to non-compliance by landlords or agents where the Council may impose civil penalties between £200 and £7,000 depending on the specific breach and there is not an option to prosecute. The term ‘offence’ is used to refer to non-compliance by landlords where the Council may either prosecute or impose a civil penalty of up to £40,000. There are no lower limits to these penalties.

Below is a list of relevant breaches or offences for which Coventry City Council can issue a civil penalty: -

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1977.
- Failure to give a written statement of terms under section 16D of the Housing Act 1988.
- Failure to give an existing tenant information about changes made by the Renters’ Rights Act under paragraph 7(2) of schedule 6 to the Renters’ Rights Act 2025.
- Attempting to let a property for a fixed term under section 16E of the Housing Act 1988.
- Attempting to end a tenancy orally or by service of a notice to quit under section 16E of the Housing Act 1988.
- Serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988.

- Relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988.
- Relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under section 16J of the Housing Act 1988.
- Failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988.
- Reletting or remarketing a property before expiry of the 12 month no-let period after using the moving and selling grounds under sections 16E and 16J of the Housing Act 1988.
- Failure to comply with an Improvement Notice under section 30 of the Housing Act 2004.
- Offences in relation to licensing of houses in multiple occupation (HMOs) under section 72 of the Housing Act 2004.
- Offences in relation to licensing of other houses under section 95 of the Housing Act 2004.
- Contravention of an overcrowding notice under section 139 of the Housing Act 2004.
- Failure to comply with management regulations in respect of houses in multiple occupation under section 234 of the Housing Act 2004.
- Breach of a banning order under section 21 of the Housing and Planning Act 2016.
- Discriminating against prospective tenants during the letting process on the grounds that those tenants are in receipt of benefits or have children under sections 33 and 34 of the Renters' Rights Act 2025.
- Marketing a letting without stating the proposed rent under section 56 of the Renters' Rights Act 2025.
- Inviting or encouraging any person to offer to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters' Rights Act 2025.
- Accepting an offer from any person to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters' Rights Act 2025.
- The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014
- The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019
- Section 83 of The Consumer Rights Act 2015
- Tenant Fees Act 2019
- The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015

- The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020
- The Smoke and Carbon Monoxide Alarm (England) Regulations 2015
- The Energy Performance of Buildings (England and Wales) Regulations 2012

Who can receive a civil penalty

Civil penalties are intended to be used against those who commit one or more of the breaches or offences outlined in this policy.

The Council should decide, based on the available evidence, where responsibility for the breach or offence lies and take action against the relevant party or parties accordingly. Table 1 below provides a summary:

Table 1 - Summary Offence Responsibilities

Breach or Offence	Responsibility
Rent to Rent	Landlord and/or Superior Landlord.
Illegal Eviction and Harassment	Anyone who has committed the offence
Assured tenancy duties	Any landlord or person acting on their behalf.
Rental Discrimination	Any landlord or person acting on their behalf.
Unlicensed HMOs	Person having control and/or Person Managing as defined by s.263 of the Housing Act 2004.
Over occupied licensed/unlicensed HMOs	HMO Licence Holder or the Person having control and/or Person Managing as defined by s.263 of the Housing Act 2004.
Failure to comply with licence conditions	Licence Holder.
Failure to comply with HMO Management Regulations	Person having control and/or Person Managing as defined by s.263 of the Housing Act 2004.
Failure to comply with a legal notice	A person on whom the notice was served.
The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014	A person engaging in letting agency work
Tenant Fees Act 2019	A landlord or agent
Section 83 of The Consumer Rights Act 2015	A letting agent

The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	A property agent in the course of English letting agency work within the meaning of section 54 of the Housing and Planning Act 2016 or English property work within the meaning of section 55 of that Act
The Smoke and Carbon Monoxide Alarm (England) Regulations 2015	"Relevant landlord" as defined in regulation 3
The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020	A private landlord or registered provider that grants, or intends to grant, a specified tenancy of social housing (within the meaning of Part 2 of the Housing and Regeneration Act 2008)

If the Council determines that a breach or offence happened with the consent, involvement, or (in most cases) due to the neglect of any officer within a limited company, a civil penalty may be imposed on that individual as well as, or instead of, the company itself.

Where more than one person is liable for the same breach or offence, the Council may impose a civil penalty on more than one person. The amount of penalty imposed on each person may differ depending on the circumstances of the case. In the case of breaches and offences relating to the duties of landlords under assured tenancies and breaches relating to rental discrimination and rental bidding, the Council may also impose a single penalty on more than one person. Where they do so, those persons are jointly and severally liable to pay it.

How the penalty is calculated

The penalty will be calculated in line with the guidance produced by the Ministry of Housing Communities and Local Government (MHCLG) available [here](#), which the Council is required to have regard to when setting penalty levels.

The Council is required to consider the following factors in determining the civil penalty is set at an appropriate level.

Severity of the offence - The more serious the breach or offence, the higher the penalty should be.

Culpability and track record of the offender - A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities.

The harm caused - This is a very important factor when determining the level of penalty. The greater the actual harm or the potential for harm, principally to the tenant but also potentially the local community, the higher the penalty should be.

Punishment of the offender - The penalty should, in a way that is fair, both punish the offender and demonstrate the consequences of not complying with their responsibilities.

Deter the offender from repeating the offence - The ultimate goal is to prevent any further offending and help ensure that the offender fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a level that it is likely to have a very significant deterrent effect.

Deter others from committing similar offences - While the fact that someone has received a civil penalty may not be in the public domain, the civil penalty policy itself will be, and the Council should consider how their formal enforcement activity can be effectively publicised.

An important part of deterrence is the realisation that the Council is proactive in levying civil penalties where the need to do so exists and the civil penalty will be set at a high enough level such that operating lawfully will be the sensible financial choice.

Remove any financial benefit the offender may have obtained as a result of committing the offence - The principle here is that it should not be in the offender's financial interest to commit a breach or offence rather than comply, for example that the penalty for breaching licensing conditions in respect of occupancy of a property is less than the additional rent received as a result of the over-crowding. The absence of any financial benefit does not mean though that the penalty should be reduced.

The guidance includes a range of starting points for each breach and offence, and the Council may use these as the starting point for all breaches and offences when calculating the level of fine.

The starting points for the various breaches and/or offences are set out in the table 2 below.

Table 2 - Starting Points for breaches and Offences

Protection from Eviction Act 1977 offences

Offence	Starting Point
Unlawful eviction and harassment (s1(2) and (3))	£35,000

Housing Act 1988 breaches and offences

Breach	Starting Point
Attempting to let the property for a fixed term (s16E(1)(a))	£4,000
Attempting to end the tenancy by service of a notice to quit (s16E(1)(b))	£6,000

Attempting to end the tenancy orally, or require that it is ended orally (s16E(1)(c))	£6,000
Serving a possession notice that attempts to end the tenancy outside of the prescribed section 8 process (s16E(1)(d))	£6,000
Relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession (s16I(1)(e))	£6,000
Failing to provide a tenant with prior notice that a ground which requires it may be used (s16E(1)(f))	£3,000
Failing to issue a written statement of terms within 28 days of an assured tenancy coming into existence (s16D)	£4,000
Failing to provide an existing tenant with prescribed information about changes made by the Renters' Rights Act (paragraph 7 of schedule 6 to the Renters' Rights Act 2025)	£4,000
Offence	Starting Point
Relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would (s16J(1))	£30,000
Reletting or remarketing a property within the 12 month no-let period after using the moving or selling grounds (s16J(2))	£25,000
Continuing breach, or repeat breach committed within 5 years of receiving a penalty for first breach (s16J(3) and (4))	Double the starting level for the two constituent breaches added together

Housing Act 2004 Offences

Offence	Starting Point
Failure to comply with an improvement notice (s.30(1))	£25,000
Mandatory HMO unlicensed (s.72(1))	£17,000
Additional HMO unlicensed (s72 (1))	£17,000
Knowingly permitting over-occupation of an HMO (s.72(2))	£20,000
Property subject to selective licensing unlicensed (s.95(1))	£12,000
Failure to comply with an overcrowding notice (s.139(7))	£20,000
Breach of HMO management regulations (SI 2006/372 and SI 2007/1903 (in respect of s257 HMOs) made under s234(1))	
Failure to provide information to the occupier (regulation 3)	£3,000
Failure to take safety measures (regulation 4)	£20,000
Failure to maintain water supply and drainage (regulation 5)	£10,000
Failure to supply and maintain gas and electricity or supply gas safety certificate (regulation 6)	£12,000
Failure to maintain common parts (regulation 7)	£7,000
Failure to maintain living accommodation (regulation 8)	£7,000
Failure to provide adequate waste disposal facilities (regulation 9)	£7,000
Failure to comply with HMO Licence Conditions	
Low Impact e.g.	£3,000

• Failure to provide tenants with contact details • Failure to address minor, non-hazardous disrepair • Failure to provide certain tenancy-related documentation	
Medium Impact e.g.	£7,000
• Failure to address persistent or serious anti-social behaviour, including the use of the property for illegal purposes • Failure to provide adequate arrangements for waste storage and disposal, resulting in significant nuisance, littering, or fly-tipping	
High Impact e.g.	£20,000
• Failure to install or maintain smoke alarms in working order • Failure to comply with fire safety or electrical safety requirements • Non-compliance with essential health and safety provisions	

Housing and Planning Act 2016 Offences

Offence	Starting Point
Breach of a banning order (s.21(1))	£35,000

Renters' Rights Act 2025 Breaches

Breach	Starting Point
Discrimination against those on benefits or with children in the lettings process (s.33 and s.34)	£6,000
Failure to specify proposed rent within a written advertisement or offer (s.56(2))	£3,000
Inviting, encouraging or accepting any offer of rent greater than the advertised rate (s.56(3))	£4,000

When determining the level of a civil penalty, the Council will have regard to the following factors and use the following steps as set out in the statutory guidance provided by Government.

Step 1 - Determining the seriousness of the breach or offence.

The seriousness, or the severity, of the breach or offence reflects the level of potential (or, in some cases, actual) harm that is intrinsic to the category of breach or offence.

For example, this will be higher for a failure by a landlord to take safety measures than to provide required information to a tenant. Case-specific potential or actual harm is not directly relevant to determining the seriousness of the breach or offence. The Council will take this into account when considering any aggravating and mitigating factors under step 2 below.

In determining the level of harm, the Council will have regard to:

- the person: i.e. physical injury, damage to health, psychological distress.
- the community; i.e. economic loss, harm to public health, and
- other types of harm; i.e. public concern/feeling over the impact of poor housing condition on the local neighbourhood.

The nature of the harm will depend on the personal characteristics and circumstances of the victim, e.g. tenant.

Where no actual harm has resulted from the offence, the Council will consider the relative danger that persons have been exposed to as a result of the offender's conduct, the likelihood of harm occurring and the gravity of harm that could have resulted.

Factors that indicate a higher degree of harm include:

- Multiple victims.
- Especially serious or psychological effect on the victim, and
- Victim is particularly vulnerable.

Seriousness also reflects intrinsic culpability. For example, this will tend to be higher for an offence which arises from a continuing or repeated breach rather than a single breach of the relevant legislation. Again, case-specific factors are not directly relevant to determining the seriousness of the breach or offence.

For example, whilst those renting out or managing properties should understand how to comply with their legal obligations, a higher degree of professionalism is likely to be expected of landlords with significant portfolios who let properties as their business than those for whom letting one or two properties is a subsidiary and, potentially, unplanned activity. The Council will take factors, such as the profile of the landlord, into account when considering any aggravating and mitigating factors under step 2 below.

Clearly, a single level penalty will not be appropriate in all cases and when assessing the level of penalty to be imposed it is expected that the maximum amount would be reserved for the worst offenders.

The actual amount levied should also take into account culpability and in doing so the Council will have regard to Table 3:

Table 3 - Examples of Culpability

Culpability	Description
High (Deliberate Act)	Intentional breach by landlord or property agent or flagrant disregard for the law, i.e. failure to comply with a correctly served improvement notice

Table 3 - Examples of Culpability

Culpability	Description
High (Reckless Act)	Actual foresight of, or wilful blindness to, risk of offending but risks nevertheless taken by the landlord or property agent; for example, failure to comply with HMO Management Regulations
Medium (Negligent Act)	Failure of the landlord or property agent to take reasonable care to put in place and enforce proper systems for avoiding the commission of the offence; for example, part compliance with a schedule of works, but failure to fully complete all schedule items within notice timescale.
Low (Low or no culpability)	An offence committed with little or no fault on the part of the landlord or property agent; for example, obstruction by the tenant to allow contractor access, damage caused by tenants

Step 2 – Applying Aggravating and Mitigating Factors

Aggravating Factors

In order to determine the final penalty, the Council will consider all aggravating factors relevant to the case.

Below is a list that will be considered as part of the determination. This is not an exhaustive list, and other factors may be considered depending on the circumstances of each case.

- Previous formal action related to this or other properties.
- Previous informal action related to this or other properties.
- Financial gain – profiting from offence/ cost cutting at the expense of safety.
- Preventing the victim from reporting, seeking assistance or support.
- Deception or falsification of facts or documents.
- Offending over prolonged period (6 months +) or involved repeated acts.
- Involving others through coercion, intimidation, or exploitation.
- Conduct intended or likely to cause additional distress (e.g., committing offence in the middle of the night).
- Lack of co-operation/ obstruction/ deliberate concealment.
- Vulnerable and/or 5 or more people affected/impacted.
- Discriminatory behaviour based on racial, religious, disability, sexual orientation, or transgender identity.
- Professional Landlord – 5 or more properties
- History of non compliance /ignoring refusal of advice.

The starting point for the penalty may be increased for each aggravating factor up to a maximum of 30%.

Mitigating Factors

In order to determine the final penalty, the Council will consider all mitigating factors relevant to the case.

Below is a list that will be considered as part of the determination. This is not an exhaustive list, and other factors may be considered depending on the circumstances of each case:

- No relevant/recent formal action
- No previous relevant informal action in relation to this or other properties
- Co-operated fully with the investigation – returned notices/documents etc.
- Voluntary steps taken to address issues e.g. submit a licence application.
- Positive character and/or exemplary conduct
- Evidence of personal/health issues preventing reasonable compliance
- Early admission of guilt – within 1 month
- Age and/or lack of maturity (only applicable to offenders ages 18-25)
- Willingness to undertake training and join CLAS
- Vulnerable individual(s) where their vulnerability is linked to the commission of the offence.
- Appointed a professional agent to act on their behalf.

The starting point for the penalty may be decreased for each mitigating factor up to a maximum 30%.

When considering aggravating and mitigating factors the civil penalty imposed must remain proportionate to the offence and it will be assumed that any offender will be able to pay a penalty up to the maximum amount unless they can demonstrate otherwise.

The Council may, exceptionally, increase the penalty above the starting point maximum or, again exceptionally, decrease it below the minimum 'tariff'.

The Council will have regard to the following general factors in determining the final level of the civil penalty:

- Any available information regarding the financial means of the offender in relation to the rental income from all rented home[s]

Where such information is available the Council may increase the penalty level by 10%.

Where there is no starting point set out in guidance for civil penalties, for example in the case of breaches of licensing conditions under sections 72(3) and 95(2) of the Housing Act 2004, the Council has set out in this policy in the relevant sections relating to the legislation, what starting levels it will apply for civil penalties for such offences.

To ensure transparency and consistency in financial penalties, the Council may adjust penalties above or below the starting point at its discretion. Each case will be considered individually based on the information available to the Council. See appendix 1 for illustrative examples.

Procedure for imposing a civil penalty

The process for issuing a Civil Penalty can vary slightly depending on the specific breach or offence. Certain breaches may not require a Notice of Intent, and some breaches attract a publication penalty.

In all cases there is an opportunity for the subject to make representations to Coventry City Council or to the First Tier Tribunal. Information on how to do this will always be included in the body of the notice.

Table 4 below broadly outlines the notices and publication restrictions on each specified breach.

Table 4 - Notice and publication restrictions

Legislation	Specific Part of the Act	Notice of Intent Required?	Publication
Housing and Planning Act 2016	Schedule 1 – Civil Penalties (Section 126 & Schedule 9)	Yes – must serve before imposing a civil penalty.	Details of penalties can be published on the Rogue Landlord Database.
Housing Act 2004	Sections 30, 72, 95 (Improvement Notices, HMO Licensing)	Yes – required before issuing civil penalty under s.249A.	Publication often via council enforcement reports or landlord database.
Protection from Eviction Act 1977	Relevant offences under eviction protections	Yes – applies when civil penalties are used instead of prosecution.	Publication through council enforcement transparency reports.
Renters' Rights Act 2025	Civil Penalty Provisions (effective May 2026)	Yes – required before imposing penalties for breaches of new tenancy rules.	Publication expected via national PRS database and council registers.

Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015	Part 3 – Compliance & Enforcement (Regulations 33–42)	No – instead a Compliance Notice is issued before a penalty notice.	Details of breach published on the PRS Exemptions Register (publicly accessible).
Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020	Part 2 – Duties & Enforcement (Regulations 3–11)	Yes – after a Remedial Notice, a Notice of Intent is required before penalty.	The Council may publish enforcement actions and penalties under transparency rules.
Smoke and Carbon Monoxide Alarm (England) Regulations 2015	Part 4 – Enforcement (Regulations 5–8)	No – enforcement starts with a Remedial Notice; penalty follows if not complied.	Council must publish a Statement of Principles to determine penalty amounts.
The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014	Part 4- Enforcement	Yes	No
Section 83 Consumer Rights Act 2015	Section 87 Consumer Rights Act 2015	Yes	No
The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	Section 10- The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019	Yes	No
Tenant Fees Act 2019	Section 8- Tenant Fees Act 2019	Yes	No

The following sets out how the Council will determine penalty levels for breaches of “relevant letting agency” legislation including, the Tenant Fees Act 2019, Redress Schemes for Letting Agency work and Property Management work (Requirement to belong to a scheme) (England) Order 2014, Section 83 of The Consumer Rights Act 2015 and the Client Money Protection Schemes for Property Agents (requirement to belong to a scheme etc.) Regulations 2019.

Coventry City Council has adopted this policy on deciding financial penalties and the appropriateness of prosecution as an alternative to imposing financial penalties under the relevant letting agency legislation.

For clarity, “relevant letting agency legislation” means: -

1. The Tenant Fees Act 2019, “the TFA 2019”.
2. Chapter 3 of Part 3 of the Consumer Rights Act 2015 as it applies in relation to dwelling houses in England.
3. An order under Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013, and,
4. Regulations under Sections 133 – 135 of the Housing and Planning Act 2016.

The Tenant Fees Act 2019 provides that enforcement authorities may impose financial penalties of up to £30,000 depending on the breach as follows:

- a) In respect of a first breach of s1 & s2, or a breach of Schedule 2 of the TFA 2019, a financial penalty not exceeding £5,000.
- b) Under s12 of the TFA 2019 a second or subsequent breach of S.1 or S.2 within 5 years of the previous breach provides for a financial penalty not exceeding £30,000 and there is alternative power to prosecute in the Magistrates Court where an unlimited fine may be imposed.

In respect of a failure of Letting Agents to publicise their fees as required by s83(3) of the Consumer Rights Act 2015 a financial penalty not exceeding £5,000.

In respect of a failure by any person engaged in Letting Agency or Property Management work who fails to hold membership of a Redress Scheme as required by Article 3 Redress Schemes for Lettings Agency Work and Property Management Work (requirement to belong to a Scheme etc.) England) Order 2014 (in respect of Lettings Agency work) or Article 5 (in respect of property management work) to a financial penalty not exceeding £5,000. (Note that it is not sufficient to simply register for redress – the correct category of membership must be obtained depending on the work carried out).

In respect of Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019: -

- a) a failure by a property agent who holds client money to belong to an approved or designated Client Money Protection (“CMP”) Scheme as required by Regulation 3, a financial penalty not exceeding £30,000, or
- b) a failure to display a certificate of membership; or publish a copy of that certificate on the relevant website (where one exists); or produce a copy of the certificate free of charge to any person reasonably requiring it as required; or notify any client in writing within 14 days of a change in the details of a underwriter to the CMP scheme or that the membership of the CMP scheme has been revoked, as required by Regulation 4, a financial penalty not exceeding £5,000.

Determining the level of the financial penalty

In accordance with the provisions of the [TFA](#) & [CMP](#) statutory guidance, the following factors should be considered by the Council when determining the level of penalty to impose for a breach of relevant letting agency legislation: -

- a) Severity of the breach.
- b) Punishment of the landlord or agent.
- c) Aggravating and mitigating factors.
- d) Fairness and proportionality.

Each of these factors are explained in more detail in the statutory guidance which you should refer to for each penalty you consider. For ease, the same considerations will be applied in cases of redress membership and breaches of S.83 Consumer Rights Act 2015.

Although the Council has therefore a wide discretion in determining the appropriate level of financial penalty in any particular case, regard has been given to the statutory guidance when making this policy.

This policy sets out the process that the Council will use in order to determine the level of financial penalty under the TFA 2019 and other relevant letting agency legislation. All stages subsequent to the issue of a Notice of Intent are subject to statutory time limits and the suspension of the process should an appeal be made to the First Tier Tribunal.

STEP ONE – Determining the category

The Council will determine the breach category having regard to the culpability and category of harm factors below. Where a breach does not fall squarely into a category, individual factors may require a degree of weighting to make an overall assessment. Other discretionary factors may also be applied in order to reflect consistency and may consider decisions in other UK jurisdictions where they contain some relevant and persuasive content.

Culpability

Very high

- Where the Landlord or Agent intentionally breached, or flagrantly disregarded, the law or/and knew their actions were unlawful.

High

- Actual foresight of, or wilful blindness to, risk of a breach but risk nevertheless taken.

Medium

- Breach committed through act or omission which a person exercising reasonable care would not commit.

Low

- Breach committed with little fault, for example, because:
 - significant efforts were made to address the risk although they were inadequate on the relevant occasion.
 - there was no warning/circumstance indicating a risk.
 - failings were minor and occurred as an isolated incident.

Harm

The following factors relate to both actual harm and risk of harm. Dealing with a risk of harm involves consideration of both the likelihood of harm occurring and the extent of it if it does.

Category 1 – High Likelihood of Harm.

- Serious adverse effect(s) on individual(s) and/or having a widespread impact due to the nature and/or scale of the Landlord's or Agent's business.
- High risk of an adverse effect on individual(s) – including where persons are vulnerable.

Category 2 – Medium Likelihood of Harm.

- Adverse effect on individual(s) (not amounting to Category 1).
- Medium risk of an adverse effect on individual(s) or low risk of serious adverse effect.
- Tenants and/or legitimate landlords or agents substantially undermined by the conduct.
- The Council's work as a regulator is inhibited.
- Tenant or prospective tenant misled.

Category 3- Low Likelihood of Harm.

- Low risk of an adverse effect on actual or prospective tenants.
- Public misled but little or no risk of actual adverse effect on individual(s).

STEP TWO - Starting point and category range

Having determined the category that the breach falls into, the Council will refer to the following starting points to reach an appropriate level of civil penalty within the

category range. The Council will then consider further adjustment within the category range for aggravating and mitigating features.

Table 5 below gives the starting points for a financial penalty in the case of a first breach in respect of prohibited payments.

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5,000.

Table 5 - Starting points - First breach in respect of prohibited payments.

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	1,250	250	2,250
Harm Category 2	1,500	500	2,500
Harm Category 1	1,750	750	2,750

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2,000	1,000	3,000
Harm Category 2	2,250	1,250	3,250
Harm Category 1	2,500	1,500	3,500

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2,750	1,750	3,750
Harm Category 2	3,000	2,000	4,000
Harm Category 1	3,250	2,250	4,250

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3,500	2,500	4,500

Harm Category 2	3,750	2,750	4,750
Harm Category 1	4,000	3,000	5,000

Table 6 below gives the starting points for a financial penalty in the case of a second or subsequent breach in respect of Prohibited Payments within 5 years of a previous breach.

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £30,000.

Table 6 - Starting points - Second or subsequent breach in respect of prohibited payments within 5 years of a previous breach.

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3,500	2,000	8,000
Harm Category 2	6,500	4,000	10,000
Harm Category 1	8,500	4,500	15,000

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	6,500	4,750	17,000
Harm Category 2	10,500	5,000	20,000
Harm Category 1	12,500	5,500	22,000

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	10,500	5,500	20,000
Harm Category 2	15,000	6,250	24,000
Harm Category 1	18,000	7,000	26,000

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	15,000	7,000	24,000
Harm Category 2	17,500	7,250	28,000
Harm Category 1	20,000	7,500	30,000

Table 7 below gives the starting points for a financial penalty in the case of a breach in respect of Publication of Fees.

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5,000.

Table 7 - Starting points for a breach in respect of publication of fees.

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)

Harm Category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Table 8 below gives the starting points for a financial penalty in the case of a breach in respect of Membership of a Redress Scheme.

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

Table 8 - Starting points for a breach in respect of Membership of a Redress Scheme.

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Table 9 below gives the starting points for a financial penalty in the case of a breach in respect of a failure to obtain membership of a Client Money Protection Scheme.

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £30,000.

Table 9 - Starting points for a breach in respect of a failure to obtain membership of a Client Money Protection Scheme.

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3500	2000	8000
Harm Category 2	6500	4000	10000
Harm Category 1	8500	4500	15000

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	6500	4750	17000
Harm Category 2	10500	5000	20000
Harm Category 1	12500	5500	22000

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	10500	5500	20000
Harm Category 2	15000	6250	24000
Harm Category 1	18000	7000	26000

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	15000	7000	24000
Harm Category 2	17500	7250	28000
Harm Category 1	20000	7500	30000

Table 10 below gives the starting points for a financial penalty in respect of a breach of transparency requirements of membership of a Client Money Protection Scheme (Regulation 4).

Minimum and maximum financial penalties for each harm category and level of culpability. Where exceptional circumstances apply the Council may reduce the minimum penalties further but may not increase them above the maximum permitted of £5000.

Table 10 - Starting points for a breach of transparency requirements of membership of a Client Money Protection Scheme (Regulation 4).

Low culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)

Harm Category 3	1250	250	2250
Harm Category 2	1500	500	2500
Harm Category 1	1750	750	2750

Medium culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2000	1000	3000
Harm Category 2	2250	1250	3250
Harm Category 1	2500	1500	3500

High culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	2750	1750	3750
Harm Category 2	3000	2000	4000
Harm Category 1	3250	2250	4250

Very high culpability

Harm Category	Starting Point (£)	Min (£)	Max (£)
Harm Category 3	3500	2500	4500
Harm Category 2	3750	2750	4750
Harm Category 1	4000	3000	5000

Obtaining financial information

The statutory guidance advises that local authorities can use their powers to, as far as possible, make an assessment of a Landlord or Agent's assets and any income (not just rental or fee income) they receive when determining an appropriate penalty. The Council will use such lawful means as are at its disposal to identify where assets might be found.

Aggravating and Mitigating Factors

The Council will identify any of the relevant factors previously described, and as a result may increase or decrease the starting point of the penalty by up to 30%.

The Notice of Intent

Before imposing a civil penalty, the Council will give a notice of intent to the individual or organisation it intends to impose the civil penalty on. The notice of intent must set out:

- the date on which the notice of intent is given.
- the amount of the proposed financial penalty.
- the reasons for proposing to impose the penalty.
- information about their right to make representations.

The notice of intent must be given no later than 6 months after the date on which the Council has sufficient evidence of the conduct to which the penalty relates. If the conduct continues then the window for giving a notice of intent extends to 6 months after the conduct stops.

Representations

A person who is given a Notice of Intent may make written representations to the Council about its intention to impose a financial penalty. This means they can give, for example, reasons as to why the civil penalty should not be imposed or why it is disproportionate.

Representations must be made within 28 days from the date the notice was given. After the end of the period for making representations, the Council will decide whether to impose a penalty and, if so, the amount of the penalty. Any representations received outside of the 28-day representation period will not be considered unless there is a written agreement already in place between both parties to extend the period beyond the 28 days.

The following approach will be applied with the purpose of settling the matter prior to any subsequent tribunal application.

- Coventry City Council may, at its discretion, offer a reduction of up to **30%** in line with guidance produced by MCHLG subject to payment being made within **21 days** of the invoice being issued. Where such a settlement is agreed, the matter will be concluded on that basis. This is intended to support proportionate enforcement and avoid unnecessary litigation, whilst preserving the right of appeal to the First-tier Tribunal
- Where payment is not made within the 21-day settlement window, the penalty will normally revert to the full amount specified in the Final Notice, payable within the statutory 28-day period unless an appeal is lodged.

- The Council may consider a repayment plan on a case-by-case basis, up to a maximum period of 24 months. An interest rate of 8% per annum may be applied under such arrangements. Nothing in this policy limits the Council's discretion to depart from these provisions where appropriate

If the authority decides to impose a financial penalty, it must issue a Final Notice requiring that the penalty is paid within 28 days. Final Notices must be issued promptly following consideration of any representations received and if the Council decides not to impose a financial penalty it will notify the recipient(s) of the Notice of Intent accordingly.

The Final (Decision) Notice

The Final Notice must set out:

- the date on which the Final Notice is given.
- the amount of the civil penalty.
- the reasons for imposing the penalty.
- information about how to pay the penalty.
- the period for payment of the penalty (28 days).
- information about the right to appeal to the First Tier Tribunal
- the consequences of failing to comply with the notice.

The Council may at any time:

- withdraw a Notice of Intent or Final Notice; or
- reduce the amount specified in a Notice of Intent or Final Notice, having regard to its civil penalty policy.

Recovery of financial penalties

If a person or company does not pay a civil penalty imposed on them, the Council may pursue recovery of the debt in Court.

Where appropriate, the Council will apply to the county court for an order to enable enforcement of the debt through the court. A certificate signed by the Chief Finance Officer of the Council which states that the amount due had not been received by a specified date will be treated by the courts as conclusive evidence of that fact.

Potential routes the Council will follow to recover the debt are:

Warrant or writ of control - This commands court enforcement agents to take goods from the debtor's home or business to satisfy the judgment debt.

Attachment of earnings order - This allows deductions to be made from the person's salary by their employer and paid to the creditor.

A third-party debt order - This means that money in a debtor's bank or building society account can be frozen for the benefit of the creditor.

A charging order - This prevents the person or organisation from selling an asset, usually a property, without paying the amount due under the charging order. This could also allow the Council to recover the debt by enforcing the sale of the asset.

Bankruptcy proceedings - This entails the Council petitioning the court to make a bankruptcy order following which the trustee-in-bankruptcy collects the debtor's assets and distributes them amongst the bankrupt's creditors in accordance with insolvency law. The amount of the debt must be at least £5,000.

The Council will consider the circumstances of the debtor and the amount of the debt before deciding on how best to collect it.

In deciding on the most appropriate course of action the Council will have regard to guidance provided by HM Courts and Tribunal Service's [What to do if you have a judgment but the defendant has not paid \(EX321\) - GOV.UK](#), which provides more detail of potential routes of enforcement and links to other guidance.

Appeals

Once a person receives the final notice they can appeal to the First-Tier Tribunal within 28 days from the date the final notice was issued. They can appeal against the penalty itself or the amount of the penalty. If a person appeals, the final notice is suspended until a decision is made on the appeal or it is withdrawn.

An appeal will involve a re-hearing by the First-Tier Tribunal of the Council's decision to impose a civil penalty. The Tribunal may also have regard to matters of which the Council was unaware when the decision to impose a civil penalty was made.

The Tribunal can dismiss an appeal if it is satisfied that the appeal is frivolous, vexatious or an abuse of process, or has no reasonable prospect of success.

The Tribunal has the power to confirm, vary (increase or reduce) the size of the civil penalty imposed by the Council, or to cancel the civil penalty. If the Tribunal decides to increase the penalty, it may only do so up to the statutory maximum for each breach or offence as applicable.

The appellant or the Council may seek permission to [appeal the decision of the First-tier Tribunal](#) to the Upper Tribunal (Lands Chamber).

Maximum Levels

There may be circumstances when the Council is dealing with offences that it considers will warrant a maximum penalty. This will be carried out in accordance with guidance provided by Government and the Council's policy.

Multiple Offences

Where the Council is satisfied that more than one offence is being committed concurrently in respect of a single property, it may issue multiple Civil Penalty Notices, (for example, where there are multiple breaches of the HMO Management Regulations).

However, where satisfied on the merits of the case and/or where the Council considers that issuing multiple penalties at the same time would result in an excessive cumulative penalty, nothing in this policy shall require the authority to do that.

The authority may take action in respect of one or some of the offences and warn the offender that future action in respect of the remaining offences will be taken if they continue.

Totality of offences

When arriving at penalty levels the total is inevitably cumulative, however the Council will determine the fine for each offence based on the relevant criteria above so far as they are known, or appear, to the Council and add up the penalties for each offence and consider if they are just and proportionate. If the aggregate total is not just and proportionate the Council will consider how to reach a just and proportionate penalty level.

There are a number of ways in which this can be achieved, for example:

- where an offender is to be fined for two or more offences that arose out of the same incident or where there are multiple offences of a repetitive kind, especially when committed against the same person, it will often be appropriate to impose for the most serious offence a fine which reflects the totality of the offending where this can be achieved within the maximum penalty for that offence.
- where an offender is to be fined for two or more offences that arose out of different incidents, it will often be appropriate to impose a separate fine for each of the offences. The Council will add up the fines for each offence and consider if they are just and proportionate. If the aggregate amount is not just and proportionate the Council will consider whether all of the fines can be proportionately reduced. Separate fines will then be considered. Where separate fines are passed, the Council will be careful to ensure that there is no double-counting.

9 Simple Caution

Coventry City Council has the power to issue simple cautions (previously known as 'formal cautions') as an alternative to prosecution for some less serious offences, where a person admits an offence and consents to the simple caution.

Where a simple caution is offered and declined, Coventry City Council is likely to consider prosecution.

A simple caution will influence how Coventry City Council and others deal with any similar breaches in the future and may be cited in court if the offender is subsequently prosecuted for a similar offence.

Simple cautions will be used in accordance with Ministry of Justice Guidance and any other relevant guidance.

10 Prosecution

When determining whether a prosecution is the appropriate sanction, the Council should satisfy itself that if the case were to be prosecuted there would be a 'realistic prospect of a conviction'. This is currently determined by consulting the Crown Prosecution Service "Code for Crown Prosecutors" which provides two tests:

- (i) the evidential test, and,
- (ii) the public interest test.

Following an investigation or other regulatory contact, the Council may prosecute or recommend prosecution where one or more of the following circumstances apply:

- A breach of the legislation resulted in a death.
- The gravity of an alleged offence, taken together with the seriousness of any actual or potential harm, or the general record and approach of the offender warrants it.
- There has been reckless disregard of legislative requirements.
- There have been repeated breaches which give rise to significant risk, or persistent and significant poor compliance.
- The breach has been carried out without or in serious non-compliance with an appropriate licence or permission.
- A duty holder's standard of compliance is found to be far below what is required by law and to be giving rise to significant risk.
- There has been a failure to comply with a statutory notice; or there has been a repetition of a breach that was subject to a simple caution.
- False or misleading information has been supplied deliberately, or there has been an intent to deceive, in relation to a matter which gives rise to significant risk.
- Officers have been intentionally obstructed in the lawful course of their duties.

Prosecution will only be considered where Coventry City Council is satisfied that:

1. There is sufficient evidence to provide a realistic prospect of conviction against the defendant(s), and
2. Prosecution is in the public's interest.

In deciding on the public interest, the Council will make an overall assessment based on the circumstances of each individual case. Careful consideration will be paid to local and corporate priorities and the following criteria:

1. The seriousness of the offence committed.
2. The level of culpability of the suspect.
3. The circumstances of, and the harm caused to the victim(s).
4. The age of the suspect at the time of the offence.
5. The impact on the community.
6. Whether prosecution is a proportionate response, and,
7. Whether sources of information require protecting.

Whilst the decision rests with Coventry City Council, prosecution is more likely where the offence is particularly serious or the offender has a history of similar breaches. Prosecution in serious cases demonstrates that the Council will take formal action where required and acts as a strong deterrent. A successful conviction may also enable the Council to apply for a banning order under the Housing and Planning Act 2016

11 Decision Making

Coventry City Council has an enforcement matrix which is used to assist officers in determining the most appropriate course of action in enforcement cases. The principle of the enforcement matrix is to provide a structured scoring system based on a number of positive and negative factors. These bands act as a guide to ensure that enforcement is fair, proportionate and consistent. Officers retain full discretion to depart from the matrix where the circumstances of the case justify doing so.

Band 1 reflects cases that once scored indicate that an informal approach is appropriate.

Band 2 reflects cases that once scored recommends a non-punitive response such as revocation of licences or reduction in licence lengths.

Band 3 captures more serious concerns which once scored is likely to require formal investigation with possible outcomes including a caution or financial penalty.

Band 4 represents the most serious cases. A formal investigation is recommended, and outcomes may include prosecution, banning orders, or significant financial penalties.

The matrix is designed to guide and support decision-making. Each case will continue to be assessed on its individual merits, and officers may deviate from the matrix where justified in order to achieve a fair and proportionate outcome.

Recording the Decision

In cases where the Council decides to proceed with formal action, an Investigation Decision Form (IDF) will be completed and a record of each decision and the reasons for the course of action made. In cases where a simple caution or prosecution are being sought the Council's Legal Services division will review and approve the case to ensure it meets the test within the Code for Crown Prosecutions. A formal decision of each simple caution and prosecution will be recorded.

12 Charging for Enforcement

If there is a statutory charging mechanism the Council will seek to recover the full costs of enforcement wherever that is possible in accordance with guidance provided by Government and its policies.

Charges are made for the serving of formal notices under the Housing Act 2004. If properties are rented in a condition that requires statutory intervention the City Council will endeavour to recover the costs incurred.

Similarly, the Council will adopt the starting points and highest penalties in the case of Civil Penalties in accordance with the guidance provided by Government and its policies.

Proceeds of Crime

Where appropriate the Council will consider the use of the Proceeds of Crime Act 2002. The Proceeds of Crime Act allows the Council to seek confiscation of any financial benefit obtained through criminal conduct following a successful prosecution.

13 Review, monitoring and reporting

In November 2025 the Government set out its roadmap for implementing the Renters Rights Act 2025.

Phase 1, which will be effective from the 1st of May 2026 will:

- a) abolish section 21 'no fault' evictions – landlords in the PRS will no longer be able to use section 21 of the Housing Act 1988 to evict their tenants.
- b) introduce Assured Periodic Tenancies in the private rented sector (PRS) – the vast majority of new tenancies and existing tenancies in the PRS will become Assured Periodic Tenancies. This means tenants will be able to stay in their property for as long as they want, or until a landlord serves

a valid section 8 notice. Tenants will be able to end their tenancy by giving two months' notice

- c) reform possession grounds in the PRS so they are fair for both parties – landlords will only be able to evict tenants when they have a valid reason. Possession grounds will be extended to make it easier for landlords to evict tenants who commit anti-social behaviour, or who are in serious persistent rent arrears.
- d) limit rent increases to once a year in the PRS – landlords will have to follow the revised section 13 procedure and provide the tenant with a notice detailing the proposed rent increase at least two months before it is due to take effect.
- e) ban rental bidding and more than one month's rent in advance – landlords and letting agents will not be able to ask for, encourage, or accept an offer that is higher than the advertised rent. Landlords and agents will also not be able to request more than one month's rent in advance.
- f) make it illegal to discriminate against renters who have children or receive benefits – landlords and letting agents will not be able to do anything to make a tenant less likely to rent a property (or prevent them from renting it) because they have children or receive benefits. This includes withholding information about a property (including its availability), stopping someone from viewing it, or refusing to grant a tenancy.
- g) require landlords in the PRS to consider tenant requests to rent with a pet – landlords will have an initial 28 days to consider their tenant's request, and they will have to provide valid reasons if they refuse it.
- h) strengthen both local council enforcement and rent repayment orders - civil penalties will be expanded, and there will be a new requirement for local councils to report on enforcement activity. Rent repayment orders will be extended to superior landlords, the maximum penalty will be doubled, and repeat offenders required to pay the maximum amount.

Phase 2, which will be made up of two stages and implemented from late 2026 includes:

- Stage 1: Regional Rollout of the Database for Landlords and Local Councils. Signing up to the PRS Database will be mandatory for all PRS landlords and they will be required to pay an annual fee which will be confirmed closer to launch. Regulations will mandate landlord registration, payment of a fee and the provision of key information by landlords.
- Subject to the will of Parliament, the Council expect this to include at minimum, for each PRS property:
 - The landlord's contact details.

- The property details including the full address, type of property (flat/ house), number of bedrooms, number of households/residents and confirming whether the property is occupied and furnished, etc.
- Safety information – Gas, Electric and Energy Performance Certificates – so tenants are assured about the safety and energy efficiency of the property.
- Stage 2: Further Roll out of the Database and Introduction of the Ombudsman.
 - Public access and data sharing will be enabled following the launch of landlord registration. The Ombudsman will provide a redress service for private rented sector tenants when things go wrong. It will also support landlords with tools, guidance and training on handling complaints from tenants early. The Ombudsman scheme will be mandatory for PRS landlords.
 - Implementation of the Ombudsman will happen after the introduction of the Database, and we continue to explore ways to share information between the Database and the Ombudsman to minimise landlord sign-up burden.

Phase 3: a new Decent Homes Standard in the PRS (dates settled following consultation), which will ensure that all PRS properties meet a minimum standard of housing quality and provide local councils with powers to take enforcement action if PRS properties fail to meet it. The implementation date for this is 2035 and the Council will review its policy at that time to ensure these provisions are covered.

This policy will be reviewed annually and any minor amendments to the legislation contained within it will be approved by the relevant Cabinet Member, if necessary, the policy will be updated as a result of major legislative or guidance changes.

The Safer Housing and Communities service will keep its regulatory activities and interventions under review, with a view to considering the extent to which it would be appropriate to remove or reduce the regulatory burdens the Council imposes, where the Council has direct control of these matters.

14 Communication and training

In order for this policy to be effective the Council will ensure that the policy is widely communicated to all employees who have responsibilities for carrying out these functions, with copies available both electronically and in hardcopy for those with limited access to computers. This policy is also available to members of the public on the Council's website at [INSERT LINK \(please note link unavailable at approval stage\)](#)

The Council is committed to providing an ongoing training programme for all employees who will have a particular role in the policy.

The Council wants to help landlords and managers meet these standards. The Council offers training through its Coventry Landlord Accreditation Scheme (CLAS) which is designed to provide education and advice to private landlords and letting agents on how to manage HMOs and privately rented properly and comply with legal requirements. Accredited landlords often gain access to training sessions, advice services, and sometimes incentives (like reduced licence fees or recognition), all of which can make it easier to fulfil their legal duties.

Landlords, agents and managers of HMOs are strongly encouraged to stay informed about their legal duties and to engage with any support programmes available (such as local council-run landlord forums or accreditation programmes). By following the regulations – ensuring fire safety, good maintenance, proper facilities, and respectful tenant management – not only do they avoid penalties, but they also provide safer, higher-quality accommodation. This proactive compliance can improve the reputation and contribute to better landlord-tenant relationships.

Appendices

Appendix 1 – Illustrative Examples

Example 1- Failure to comply with an Improvement Notice

An Improvement Notice served under Part 1 Housing Act 2004 specifies repairs/improvements that the recipient should carry out in order to address one or more identified Category 1 and/or Category 2 hazards in a property. Category 1 hazards are the most serious hazards, judged to have the highest risk of harm to the occupiers; the Council has a duty to take appropriate action where a dwelling is found to have one or more Category 1 hazards present.

In most cases, the service of an Improvement Notice will have followed an informal stage, where the landlord had been given the opportunity to carry out improvements without the need for formal action. In such cases, an identified failure to comply with an Improvement Notice will represent a continued failure on the part of the landlord to deal appropriately with one or more significant hazards affecting the occupier[s] of the relevant dwelling.

The Council would view the offence of failing to comply with the requirements of an Improvement Notice as a significant issue, exposing the tenant[s] of a dwelling to one or more significant hazards. In line with Government guidance the starting point for that offence would be **£25,000**.

If the landlord has been experiencing ill health this can be applied as mitigation and a reduction may be applied, and/or if the landlord has refused to cooperate with

Coventry City Council an increase may be applied. Each of the mitigating factors and/or aggravating factors may therefore be increased or decreased up to maximum of no more than **30%**.

Example 2- Ending a tenancy orally

Where a landlord attempts to end a tenancy orally or requires that it is ended orally (s16E(1)(c)) a penalty with a starting point of **£6,000** may be applied. Mitigating or aggravating factors may be applied to this figure based on the available evidence in order to reach the proposed penalty amount. There are scenarios where this may escalate and the landlord decides to evict that tenant unlawfully (see example 3).

Example 3- Unlawful eviction and harassment

If the landlord in Example 2 then continues to evict their tenant unlawfully without following due process, Coventry City Council may serve a further penalty with a starting point of **£35,000**. Again, applying any relevant mitigating or aggravating factors up to a maximum of **30%**.

This highlights the importance of following the correct eviction process.

Example 4 - Failure to License offences

Under Part 2 Housing Act 2004, most higher risk HMOs occupied by five or more persons forming two or more households are required to hold a property licence issued by the Council. Mandatory HMO licensing was introduced to allow local authorities to regulate standards and conditions in high risk, multiply occupied residential premises.

The Council would view the offence of failing to license an HMO as a significant failing; Under the Council's policy the civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant aggravating or mitigating factors [see below] would be regarded as an offence. In line with Government guidance the starting point for that offence would therefore be **£17,000**.

Where a landlord or agent is controlling/owning a significant property portfolio, and/or has demonstrated experience in the letting/management of property, the failure to license an HMO would be viewed as being more serious attracting a civil penalty above the defined starting point but not exceeding the maximum limit of £40,000.

Failure to license a property under the Council's Additional [HMO] Licensing Scheme

The Council has designated the whole of the city as an additional licensing area. The scheme came into force on the 4th May 2020 and was renewed for a further five years on 4th May 2025. Under the scheme, all HMOs occupied by three or more persons forming two or more households sharing one or more basic amenities such as a WC or kitchen, but which fall outside the scope of mandatory HMO licensing, will be required to hold an additional licence in order to be legally let as well as those HMOs

that fall within the definition of self-contained flats under Section 257 of the Housing Act 2004.

The Council would view the offence of failing to license an HMO under its additional licensing scheme to be serious and under its policy the civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant aggravating or mitigating factors, taking into account Government guidance the starting point for that offence would be **£17,000**.

Where a landlord or agent is controlling/owning a significant property portfolio and has failed to licence and/or has demonstrated experience in the letting/management of property this would be viewed as an aggravating factor and an increase may be applied up to maximum of **30%**.

Example 5 - Breach of HMO licence conditions

Under section 72(3) of the Housing Act 2004, licence holders of Houses in Multiple Occupation (HMOs) are required to comply with all conditions attached to an HMO licence. These conditions impose a range of duties relating to the management, safety, amenity standards and overall condition of the premises. Typical licence conditions may include requirements to:

- Undertake periodic Gas Safe and electrical safety checks, commissioning of Electrical Installation Condition Report EICR
- Install, maintain, and test smoke alarms and fire safety provisions in accordance with BS5839
- Obtain and retain tenant references, provide written tenancy agreements, and protect tenancy deposits
- Notify the Council of specified changes in circumstances relevant to the licensed property
- Implement reasonable measures to prevent or manage anti-social behaviour
- Maintain the property in good repair and keep external areas, including gardens, clean and free from refuse
- Complete works required as conditions of the granted licence, including works to reduce occupancy where necessary

The Council expects full compliance with all licence conditions, recognising that some breaches pose significantly greater risks to tenants and the wider public than others.

In determining an appropriate civil penalty, the Council will therefore consider:

- The number and nature of the licence condition breaches; and
- The extent and seriousness of deficiencies associated with each breached condition.

Given the wide variation in circumstances across cases, the following starting points are provided as a guide for determining civil penalties for breaches of licence

conditions by a licence holder managing one or two licensed HMOs, where no additional aggravating or mitigating factors are present.

1. Low-Impact Breaches – Starting Point: **£3,000**

Low-impact breaches include administrative or minor management failures that do not directly increase risks to health or safety. Examples include:

- Failure to provide tenants with contact details
- Failure to address minor, non-hazardous disrepair
- Failure to provide certain tenancy-related documentation

2. High-Risk Health and Safety Breaches – Starting Point: **£20,000**

Breaches that directly compromise the safety of occupants or increase the risk of injury or serious harm will attract higher penalties. Examples include:

- Failure to install or maintain smoke alarms in working order
- Failure to comply with fire safety or electrical safety requirements
- Non-compliance with essential health and safety provisions

3. Serious Management and Behaviour-Related Breaches – Starting Point: **£7,000**

Breaches involving significant management failures or conditions that negatively impact the local community are treated as serious offences. Examples include:

- Failure to address persistent or serious anti-social behaviour, including the use of the property for illegal purposes
- Failure to provide adequate arrangements for waste storage and disposal, resulting in significant nuisance, littering, or fly-tipping

Assessment of Aggravating and Mitigating Factors

The Council may apply any relevant mitigating or aggravating factors up to maximum of **30%**. Where a licence holder is responsible for a significant number of licensed HMOs, this would be viewed as an aggravating factor, and an increase would be applied conversely where a licence holder was able to provide mitigating evidence a decrease may be applied up to a maximum of **30%**.

The Council will make a subjective assessment of which aggravating or mitigating factors best fit the circumstances of the case based on available evidence.

Example 6 - Failure to Comply HMO Management Regulations (to be included in an Appendix)

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on the persons managing certain HMOs in respect of:

- Regulation 3 - Providing information to occupiers
- Regulation 4 - Taking safety measures, including fire safety measures

- Regulation 5 - Maintaining the water supply and drainage
- Regulation 6 - Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected
- Regulation 7 - Maintaining common parts
- Regulation 8 - Maintaining living accommodation
- Regulation 9 - Providing sufficient waste disposal facilities

Note - The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 place similar obligations on the managers of HMOs as defined by Section 257 Housing Act 2004.

It is important that the manager of an HMO complies with all regulations, but the Council recognises that a failure to comply with certain regulations is likely to have a much bigger impact on the safety and comfort of residents than others. Furthermore, and using Regulation 8 as an example, a breach of this regulation could relate to defects to an individual window in one HMO but multiple defects to the structure, fixtures & fittings in a number of rooms in a second HMO.

In determining the level of a civil penalty, the Council will therefore initially consider;

1. The number and nature of the management regulation breaches; and
2. The nature and extent of deficiencies within each regulation.

Clearly, the circumstances of HMO Management Regulation offences have the potential to vary widely from case to case but, as a guide the Council will apply the relevant starting points and any other relevant aggravating and mitigating factors.

The civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant aggravating or mitigating factors [see below], for failure to display a notice containing their contact details would be regarded as a Regulation 3 offence. In line with Government guidance the starting point for that offence would be **£3,000**.

Where a landlord or agent is controlling/owning a significant property portfolio and is therefore considered to be a 'professional' landlord or agent but has failed to display such details this would be viewed as an aggravating factor and an increase may be applied up to maximum of **30%**.

The civil penalty for a landlord controlling one or two HMO dwellings, with no other relevant factors or aggravating features [see below], for a failure to maintain fire alarms in working order, to maintain essential services to an HMO or to fail allow an HMO to fall into significant disrepair would be regarded as multiple offences under Regulations, 4, and 7 and as such, in line with Government guidance the starting points for these offences would be **£20,000 and £7,000** respectively.

Where a landlord or agent is controlling/owning a significant property portfolio and is therefore considered to be a 'professional' landlord or agent but has failed to comply with the multiple regulations this would be regarded as separate aggravating factors and an increase may be applied to both regulation offences up to a maximum of **30%**.

Example 7 – Multiple HMO offences

The landlord of an HMO property fails to obtain a licence and there are also multiple breaches of Regulation 4 of the HMO Management Regulations. They only operate one HMO and there are no other relevant aggravating or mitigating factors. The offences are regarded as separate and in line with the guidance provided by Government the starting points would be **£17,000 and £20,000** respectively.

The landlord makes a complete application for the HMO licence and rectifies the Regulation 4 breaches within the period allowed for representations. No other representations [or representations that are upheld] are made to the Council.

In determining the final penalty level, the Council may apply a discount for the two mitigating factors and a discount for the totality of offences, which would be deducted from the starting points due to compliance during the representation period.

Example 8 – Multiple breaches of “relevant letting agency” legislation

Where a Landlord or Agent is to be penalised for two or more breaches or where there are multiple breaches of a repetitive kind, especially when committed against the same person, it will often be appropriate to impose for the most serious breach a financial penalty which reflects the totality of the conduct where this can be achieved within the maximum penalty for that breach. No separate penalty should be imposed for the other breaches.

Where a landlord or Agent is to be penalised for two or more breaches that arose out of different incidents, it will often be appropriate to impose separate financial penalties for each breach. The Council should add up the financial penalties for each breach and consider if they are just and proportionate. If the aggregate amount is not just and proportionate the Council may consider whether all of the financial penalties can be proportionately reduced. Separate financial penalties may then be imposed.

Where separate financial penalties are imposed, the Council must take care to ensure that there is no double-counting.

Appendix 2 - The Renters Rights Act 2025

The Renters Rights Act 2025 provides the Council with a number of new tools to utilise when investigating breaches of the legislation or relevant offences. Officers authorised in writing by the Council may exercise investigatory powers, these powers can be used

if the officer suspects certain laws have been broken. The officer can use these powers to support enforcement of the following legislation:

- Protection from Eviction Act 1977, sections 1 and 1A
- Housing Act 1988, chapter 1 of Part 1.
- Enterprise and Regulatory Reform Act 2013, section 83(1) or 84(1).
- Housing and Planning Act 2016, sections 21 to 23.
- Renters' Rights Act, chapter 3 of Part 1 and Part 2.

Please read on for a summary of available powers.

Ask a relevant person for information

Where an officer is investigating whether someone has broken the law in relation to the legislation, they can ask a relevant person for information to use as evidence.

Definition of a Relevant person

An authorised officer can require this from anyone who has acted in the past twelve months as a landlord, agent, licensor, or marketer in connection with the relevant accommodation. The officer can also ask for information from anyone who, in the past twelve months, had an estate or interest in the relevant accommodation or who purported to act for someone with such an interest or a licensor. This person is referred to as a 'relevant person' in the Act, section 114(2).

Asking for information

Authorised officers must give notice to the person or organisation from whom they are requiring the information. The notice must:

- be in writing.
- specify that it is given under section 114 of the Act.
- explain the possible consequences of not giving the information.

A notice does not require a person to provide information or documents that they could refuse to provide in High Court proceedings due to legal professional privilege.

The officer can also ask for this information to be given:

- by a specific date.
- in a specific format, for example, original or digital documents.
- in a new document with specific information.
- to a specific person or enforcement authority.

When a relevant person does not give information

If an authorised officer requires you to produce information and you fail to do so as requested, this may be an offence, and the courts could find you liable for a fine not exceeding level 3 on the standard scale (£1,000). The potentially relevant offences are set out in section 131 of the Act [here](#).

You will not be guilty of an offence if you have given reasonable excuse for not providing the information. If you give information which you know to be false or misleading or is reckless as to whether it is false or misleading, you will also commit an offence and may also be liable for a fine not exceeding level 3 on the standard scale (£1,000). A person has the right not to give information if it might incriminate them.

When using the powers to require information under the Act the Council must comply with the Investigatory Powers Act 2016 (as amended) (IPA). For more information, you should refer to the IPA available [here](#) and the Communications Data Code of Practice available [here](#)

Ask “any person” for information

When an authorised officer reasonably suspects that someone has broken the law in relation to the below list of legislation, the officer can require “any person” or organisation to provide information, in order to investigate whether any of those laws have been broken.

An authorised officer can also ask for the information after the investigation is over to help set the level of any civil penalty. This power can be used to support enforcement of the following legislation (the rented accommodation legislation (section 115(3)):

- Protection from Eviction Act 1977, sections 1 and 1A (section 1A not in force when the guidance is issued).
- Housing Act 1988, chapter 1 of Part 1.
- Enterprise and Regulatory Reform Act 2013, section 83(1) or 84(1).
- Housing and Planning Act 2016, sections 21 to 23.
- Renters’ Rights Act, chapter 3 of Part 1 and Part 2 (Not in force at the time this guidance was issued).
- Housing Act 2004, parts 1 to 4 and 7.

Asking for information

Where an officer uses this power, they will need to give notice to the person or organisation from whom they are seeking the information requiring them to provide it. The notice must:

- be in writing.
- specify that it is given under section 115 of the Act.
- explain the possible consequences of not giving the information.

The officer can also ask for this information to be given:

- by a specific date.
- in a specific format, for example, original or digital documents.
- in a new document with specific information.

- to a specific person or enforcement authority.

When any person does not give information

If an officer requires a person or organisation to produce information and they fail to do so, the officer can apply for a court order to enforce the notice under section 116 of the Act.

The court may make an order if it is satisfied that the person on whom the notice was served has not complied with that request. The court order could compel the person to give the information that the officer has asked for. The court could also ask that person to pay for the costs of applying for the order.

When an authorised officer has asked for information from a company, partnership or unincorporated association, the court may ask a person holding an official position at the company and who is responsible for not providing the information, to meet the costs of applying to the court.

Limitations of the use of information collected using the any person power

If someone provides information under the any person power, that information may not be used against the person who provided it in any criminal proceedings. The prosecution also cannot ask questions about this information in criminal proceedings. The person who might be incriminated by the information they gave may, however, use the information or ask questions about it during criminal proceedings. The limitations on the use of information provided under section 116 are set out in section 117 of the Act.

If someone knowingly and wilfully makes false statements or provides certain types of false information, even if not under oath, it may be possible to prosecute them under section 5 of the Perjury Act 1911. This applies to information collected using the any person power.

Asking for communications data

When using the powers to require information under the Act the officer must comply with the Investigatory Powers Act 2016 (as amended). For more information, you should refer to the IPA and the Communications Data Code of Practice available [here](#).

Powers to enter a business premises

The Act contains powers to enter a rental sector business premises with, and without, a warrant under sections 118 and 121 respectively. An authorised officer can enter a business premises at a reasonable time to request documents and or to seize evidence if they reasonably believe a relevant person is running a rental sector business there. A relevant person is defined in the Act, section 114(2) as anyone who has, in the past twelve months, in relation to relevant accommodation:

- had an estate or interest in the premises, (unless they are a mortgage lender who is not in possession of the premises).
- been a licensor.
- marketed the premises.
- acted for or purported to act for someone with an estate or interest in the premises or a licensor.

Relevant accommodation

Relevant accommodation means any residential accommodation in England that is connected with the exercise of the function for which an officer intends to exercise the investigatory power, see section 114(10).

Rental sector business is defined in, section 118(9) of the Act as a business connected with:

- letting residential accommodation in England.
- creating licences to occupy such accommodation.
- marketing such accommodation for a tenancy or licence to occupy.
- managing such accommodation under a tenancy or licence to occupy.

These powers of entry may not be used for premises that are wholly or mainly used as a home.

An officer can only enter the premises to investigate if they suspect a breach or offence has been committed under the rented accommodation legislation and their suspicion is a reasonable one. An officer will also need to be satisfied that entry is necessary to require documents to be produced or to seize documents which are on the business premises and could help with the investigation.

An officer can use these powers of entry into business premises (with and without a warrant) to support enforcement of the rented accommodation legislation.

Entering business premises to investigate

If an authorised officer is exercising the power of entry into business premises, they are allowed to:

- take another person or persons with them, who will then have the same powers as the authorised officer.
- take equipment.
- take photographs.
- make recordings link to bodycam policy.

Giving notice to enter business premises without a warrant

An authorised officer can use the power of entry without a warrant for routine inspections. The officer must provide an occupier of the business premises with at least 24 hours' written notice, though the occupier can waive the requirement to provide the full 24 hours' notice and allow entry earlier if they wish.

If the occupier chooses to waive the full notice requirement, it is important for the officer to make sure that the person giving the waiver fully understands their rights and the consequences of giving the waiver before it is acted upon.

If notice is not waived, the notice must:

- be in writing and given by a local housing authority officer.
- explain the reason for entering the premises.
- explain what offences may be committed if a person without reasonable excuse seeks to obstruct entry, fails to comply with a requirement or to give assistance or information, or knowingly or recklessly gives false or misleading information.

An authorised officer does not need to give 24 hours' notice if they are exercising the power of entry for a non-routine inspection. A non-routine inspection is when:

- it is not reasonably practical to give notice.
- an officer reasonably believes that giving notice would defeat the purpose of entry.

If the officer enters a business premises without a warrant, they must give to at least one person on the premises (if there are any):

- evidence of their identity and authority.

If the officer enters without giving notice (a non-routine inspection) they must give to at least one person on the premises (if there are any):

- a document explaining why they are entering and why it is necessary.
- information about what offences you could be committing if you do not cooperate.

If it is not reasonably practical to provide the information set out above, for example due to safety concerns or if the person on the premises fled before the Officer had a chance to give the above information, any information already collected can still be used as evidence in your investigation.

Entering a business premises with a warrant

If an Officer cannot carry out a routine inspection with at least 24 hours' notice, they may also apply to a justice of the peace for a warrant to enter specified premises under the Act, section 120.

To apply for the warrant, they must provide written evidence under oath that one of the following applies:

- they have been refused entry or believe they are likely to be refused entry, and they have notified an occupier of the premises of their intention to apply for a warrant.
- they believe that giving notice might result in evidence being hidden or tampered with.
- no occupier is present, and waiting for an occupier might defeat the purpose of the entry.

The officer will also need to provide evidence that they are acting in their official capacity and that there are reasonable grounds to suspect the premises are used by a relevant person for rental sector business and are not wholly or mainly residential accommodation.

Additionally, the officer will need to show that they expect there to be documents on the premises that they could require a person to produce or that could be seized under the Act.

Once granted, the warrant will be valid for one month starting on the day it is issued.

When entering a business premises under a warrant an authorised officer may use reasonable force if necessary.

When an officer enters the premises, they must show the warrant to at least one occupier if there are people present.

If there are no people in the premises, then they must:

- leave a notice that the premises have been entered under warrant granted under section 120 of the Act.
- make sure the property is as secure when they leave as it was before they entered.

Business premises: requiring the production of documents following entry

Once an authorised officer has entered the business premises, either under section 118 or a warrant under section 120 of the act, they can ask for documents from a relevant person occupying the premises or someone acting on their behalf, at any

reasonable time. The officer can also ask for documents to try to determine whether there has been compliance with the rented accommodation legislation where they reasonably believe there has been non-compliance.

The officer can only ask for documents related to the business for which the premises are occupied and to which the person they have asked has access. The officer can ask for documents if they think they may be needed as evidence. The officer can also take copies of the documents produced.

An officer can ask for the documents to be explained to them and if the document is electronic, they can require a copy of the document in a format that can easily be taken away, for example, a hard copy.

The officer cannot require the production of documents which are legally confidential, such as communications between a lawyer and their client.

An officer can request documents even if the need for them relates to someone other than the relevant person who is required to provide them.

Taking documents after entry into business premises

When using either of the powers of entry into a business premises, an authorised officer has the power to seize and detain documents if they have a reasonable suspicion that the documents may be required as evidence in proceedings for a breach or offence under the rented accommodation legislation.

If there are people on the premises, before an officer seizes documents, they must show at least one person proof of their identity and authority. However, if it is not reasonably practicable to do so, the officer does not need to.

When seizing documents, an officer must take reasonable steps to tell the person who they are seizing them from that they have been seized and provide a written record of what they are taking.

When deciding what steps an officer should take to inform the person that documents have been seized and to provide them with a written record, they must have regard to any relevant rules around seizing property that are set out in a code of practice made under section 66 of the Police and Criminal Evidence Act 1984 available [here](#).

An officer cannot seize documents that are legally confidential, such as communications between a lawyer and their client and can usually only keep the documents for 3 months from the day they were seized. If the documents are needed

for legal proceedings (related to why they were seized), the officer can keep them for longer but not for longer than needed for the proceedings.

If there are electronic devices on the premises which an officer suspects may hold information that they may wish to seize under this power, they can require someone with approved access to access that information if that is reasonably necessary. If such a person does not access the device after an officer has required them to do so, they can access the device themselves.

Criminal Justice and Police Act 2001: additional powers of seizure

If an officer takes copies of documents using the power under section 122(1)(b) or they seize documents under section 123 of the Act following entry into business premises (under the Act), additional powers of seizure under section 50 of the Criminal Justice and Police Act 2001 apply.

If the officer reasonably suspects that a document may be needed as evidence for a breach or offence under the rented accommodation legislation, they can take it.

If the officer reasonably believes the document is something they are allowed to search for or seize or that it contains information they are allowed to seize, but it's not reasonably practical to decide this on the premises or to separate it on the premises, they can take the document using the additional powers in section 50 of the Criminal Justice and Police Act 2001 available [here](#).

An officer will then need to assess if the document is relevant as soon as reasonably practicable afterwards. If it is not relevant, they will need to give it back as soon as reasonably practicable.

If an officer is sure that a document contains information that may be needed as evidence they can take it, using the additional powers in section 50 of the Criminal Justice and Police Act 2001, even if it cannot be separated from a part they could not otherwise take.

If an officer is unsure whether the information in a document may be needed as evidence and it cannot be separated from information, they know is not relevant, then they cannot take it.

If an officer takes documents using the additional powers of seizure under section 50 of the Criminal Justice and Police Act 2001, they will need to comply with the notice requirements to the occupier under section 52 of that Act available [here](#).

Access to seized documents s.124

A person who had possession or control of a document immediately before it was seized, or their representative, can request:

- access to the documents.
- a copy or photograph of the document.

On receipt of a request, an officer must:

- give the person access to the documents under the supervision of a local housing authority officer.
- allow the person to take a copy or photograph it under the supervision of a local housing authority officer.
- provide the person with a copy or photograph of the document within a reasonable time of their request.

If an officer has good reason to think that allowing access to the document, or providing photographs or copies of it, would undermine or be detrimental to the reason why the document was seized, can refuse the request.

Appeal against detention of documents s.125

A person can ask the magistrates' court to release the documents detained under the Investigatory Powers in Part 4 of the Act. A person must have an interest in the documents to make a valid request. If there are court proceedings brought as a result of the investigation that led to the documents being seized, an application will need to be made to the magistrates' court for a hearing. If there are no proceedings the application is made as a complaint to a magistrates' court.

The court may only order the release of documents if certain conditions are met. These are that:

- the investigation that led to the documents being seized has not resulted in any court proceedings starting.
- it has been 6 months or more since the documents were seized.
- court proceedings have now finished.

A person or local housing authority officer disagreeing with any magistrates' court decision can appeal this decision through the Crown Court.

Suspected residential tenancy - power of entry

An authorised officer can use this power to enter a residential property at a reasonable time if they are specially authorised and reasonably suspect the property is being

privately rented out as a home (a residential tenancy, see section 63 of the Act), and if they need to inspect the premises to investigate whether there has been:

- an offence under section 1 of the Protection from Eviction Act 1977.
- certain breaches and offences under certain database provisions in the Act.

The residential power of entry without a warrant under section 126 is available to support enforcement in respect of the following database provisions:

- breach of the duty on a residential landlord to ensure an active landlord and active dwelling entry in the database, section 82(3).
- the offence of knowingly or recklessly providing false or misleading information to the database operator, section 92(1).
- the offence of continuing to breach the duty to ensure an active landlord and dwelling entry in the database at the end of a 28-day period beginning on the day on which a financial penalty for the breach was imposed, section 92(2).
- the offence of breaching the duty to ensure an active landlord and active dwelling entry in the database section 82(3) when a relevant penalty has been imposed for a breach of requirements under section 82(1), 82(2) or 82(3), section 92(3).
- the offence of breaching the duty to ensure an active landlord and active dwelling entry in the database within 5 years of either receiving a penalty or a conviction for a database offence, section 92(4).

Entering residential premises without a warrant to investigate

An officer can only use this power to enter if:

- They have the correct authorisation by a deputy chief officer or their superior, whose duties relate to the purpose for which they want to enter the residential premises.

An officer's authorisation will state the specific purpose for which they are authorised to enter the residential premises.

If an officer is exercising the power of entry, they are allowed to:

- take another person(s) with them, who will have the same powers as the authorised officer.
- use equipment.
- take photographs.
- make recordings add link to bodycam policy.

Before an officer enters they must give at least 24 hours' notice to the person or people living there and to any other person who has an interest in the property, like the owner. They do not, however, need to give prior notice to a residential landlord within the meaning of Part 2 of the Act, see Section 63 [here](#).

The requirement to give notice to a person with an interest also does not include a mortgagee not in possession of the premises. An officer must give notice to a residential landlord informing them that the property was entered, including the date of the entry and the purpose of the entry, within a reasonable period after the entry.

The officer only needs to give notice to other people who have an interest in the property but do not live there if they have provided the Council with an address for this purpose.

This notice must:

- be in writing.
- be given by an officer of the local housing authority.
- explain the reason for entering the premises.
- explain what laws a person may be breaking if they obstruct the entry or fail to comply with properly imposed requirements.

A person can waive the need for the full 24 hours' notice. If you choose to waive the full notice requirement, it is important to make sure that you understand the waiver and that you have a right to receive notice and the consequences of waiving it.

However, an officer cannot enter a residential property without giving the required notice unless all people living in the property, and everyone with an interest in the property who has a right to notice, waived it.

For example, if all of the people living at the property waive their right to notice, but an owner with a right to notice does not, the officer must follow the notice requirements before entering the property.

Where an officer enters a property without a warrant and find occupiers in the property, they must show identification to at least one occupier if there is more than one.

This identification is a document saying that the officer is specially authorised to enter the property and is handed to the occupier or at least one occupier if there is more than one.

There may be times when it's not reasonably practicable for the officer to show Identification and special authorisation document upon entry, such as if the officer encounters aggressive behaviour or if the occupiers have fled before they can show them the documents. When this happens, any information already collected can still be used as evidence in the investigation.

Suspected residential tenancy: entry with a warrant

An authorised officer can apply for a warrant if they have been refused entry without a warrant. The officer can also apply for a warrant if no-one is in the property to let them in and waiting for someone might defeat the purpose of the entry.

The officer can also apply for a warrant if they think giving the person on the premises and/or anyone with an interest in the property, who would have a right to notice, at least 24 hours' notice might defeat the purpose of entry. To ask for a warrant, they must apply in writing under oath to a justice of the peace.

The officer can apply for a warrant to enter a residential premises if they believe it is necessary to enter the premises to investigate an offence under section 1 of the Protection from Eviction Act 1977 or certain breaches or offences of certain database provisions in the Act. These are the same provisions for which the power of entry without a warrant under section 126 may be exercised namely.

- Breach of a duty of a residential landlord to ensure an active landlord and active dwelling entry in the database, section 82(3).
- The offence of knowingly or recklessly providing false or misleading information to the database operator, section 92(1).
- The offence of continuing to breach the duty to ensure an active landlord and dwelling entry in the database at the end of a 28-day period beginning on the day on which a financial penalty for the breach was imposed, section 92(2).
- The offence of breaching the duty to ensure an active landlord and active dwelling entry in the database under section 82(3) when a relevant penalty has been imposed for a breach of requirements under section 82(1), 82(2) or 82(3), section 92(3).
- The offence of breaching the duty to ensure an active landlord and active dwelling entry in the database within five years of receiving either a penalty or a conviction for a database offence, section 92(4).

The application under oath will also need to confirm that in entering the residential premises the officer would be acting in the course of their employment or under the instruction of the Council and that they reasonably suspect the property is being privately rented out as a home (a residential tenancy, see section 64 of the act).

If a warrant is granted it will include the following information:

- the name of the person authorised to enter; this will be the officer who applied for the warrant.
- the property that the person named in the warrant is authorised to enter.
- Once the inspection has been completed the warrant will expire.

When an officer is entering with a warrant, they will be able to:

- enter the premises at any reasonable time.
- use reasonable force to enter, if necessary.
- take another person, or persons, who will have the same powers as the officer, but only whilst with the officer and under their supervision.
- use equipment.
- take photographs.
- make recordings.

The officer must show the warrant to at least one occupier if there are people in the property. If there are no people in the property, then the officer must:

- leave a notice that the premises have been entered under warrant issued under section 128 of the Renters Rights Act 2025 available [here](#).
- make sure the property is as secure when they leave as it was before they entered.

Using Council Tax, Housing Benefit and Tenancy deposit information s.134

Section 212A of the Housing Act 2004 allows authorised officers to use information from tenancy deposit schemes and section 237 allows them to use information from Housing Benefit and Council Tax to investigate if certain laws have been broken. For example, to check if:

- several claims for Housing Benefit are made from the same address.
- there are too many people living in the property.
- the property is being rented.
- the property may need a licence as an HMO.

The Act makes provision so that officers can use this information to support enforcement of the following legislation.

- Protection from Eviction Act 1977, sections 1 and 1A.
- Housing Act 1988, chapter 1 of Part 1.
- Part 7 of the Housing Act 2004 so far as it relates to qualifying residential premises withing the meaning given by section 2B of the Housing Act 2004.
- Enterprise and Regulatory Reform Act 2013, section 83(1) or 84(1).

- Housing and Planning Act 2016, sections 21 to 23, 41 and 133 to 135.
- Renters' Rights Act 2025, chapter 3 of Part 1 and Part 2.

Investigatory powers under the Housing Act 2004 s.135

The Renters Rights Act 2025 amends the power under section 235 of the Housing Act 2004 (power to require documents to be produced) so that it now also covers Part 7 of the Housing Act 2004 in relation to any qualifying residential premises within the meaning given by section 2B of the Housing Act 2004.

This means authorised officers can require information from a relevant person to inform the setting of civil penalties after the investigation is finished.

The Act also amends section 239 of the Housing Act 2004. It removes the requirement to give 24 hours' prior notice to the owner of qualifying residential premises within the meaning of section 2B and replaces it with a duty to notify the owner within a reasonable period of time after entry takes place. The Act also inserts an option for an occupier to waive their right to 24 hours' prior notice of entry under section 239 Housing Act 2004. It is important to make sure the person giving the waiver understands that they have the right to notice and the implications of waiving it. However, an authorised officer cannot enter the property without giving the required notice unless all people living in the property, and everyone with an interest in the property, who has a right to notice, agrees that notice is not needed.

Investigatory powers Client Money Protection schemes s.136

The Council is responsible for the enforcement of client money protection schemes regulations. Agents must be registered with a client money protection scheme under sections 133-134 of the Housing and Planning Act 2016 and Regulation 3 of the Client Money Protection (CMP) Schemes for Property Agents (Requirement to Belong to a Scheme etc) Regulations 2019.

The Act enables an authorised officer to investigate whether an agent is a member of a CMP scheme in accordance with regulation 3 of The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019.

Section 136 of the Renters Rights Act 2025 permits The Council to utilise investigatory powers under Schedule 5 of the Consumer Rights Act 2015 for investigating breaches of the Client Money Protection (CMP) Schemes for Property Agents (Requirement to Belong to a Scheme etc) Regulations 2019.

Investigatory Powers Consumer Rights Act 2015

Where The Council is investigating a breach of certain specified offences such as;

- Tenant Fees Act 2019.
- The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019.
- Section 83 of The Consumer Rights Act 2015.

It may use supplementary powers provided by Schedule 5 of The Consumer Rights Act 2015.

Paragraph 14 production of information

An authorised officer may request information to prove whether a breach of the relevant legislation has occurred. The request for information must be in writing and specify the purpose for which the information is required.

If the information is required for a specified function, then the notice must specify the function concerned e.g. an investigation under the provision of The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019 or other applicable legislation.

The notice must specify the following;

- The timescale for compliance e.g. the date the information must be provided by.
- The form in which it should be provided.
- The circumstances in which a monetary penalty will be payable due to non-compliance with the notice.

The notice may also require the following ;

- the creation of documents, or documents of a description, specified in the notice.
- the provision of those documents to the enforcer or an officer of the enforcer.
- to provide information or create the document that is required in a legible form.

A paragraph 14 notice does not require a person to provide any information or create any documents which the person would be entitled to refuse to provide or produce

- a) in proceedings in the High Court on the grounds of legal professional privilege, or
- b) in proceedings in the Court of Session on the grounds of confidentiality of communications.

If a person fails to provide the information requested within a notice under paragraph 14, the Council may make an application under this paragraph to the court.

If it appears to the court that the person has failed to comply with the notice, it may make an order under this paragraph.

The Council may also utilise other powers defined in schedule 5 of The Consumer Rights Act 2015 when investigating the relevant breaches or to ensure that lettings or

property management agents are compliant with the legislation. For further information on the use of these powers please follow the link below;

- [Consumer Rights Act 2015](#)
- [Investigatory powers of consumer law enforcers: guidance for businesses on the Consumer Rights Act 2015](#)

Interviews under the Police and Criminal Evidence Act (PACE)

The Council may interview, under caution persons suspected of committing certain offences. This would be in the form of a voluntary, digitally recorded interview where the suspect is invited to attend the Council offices. Where an individual does not wish to attend an interview the Council will provide an opportunity for a written statement to be submitted.

Persons suspected to be in contravention of the Housing Act 2004 or Protection from Eviction Act 1977 will not usually be invited for interview under caution unless the case is especially complex or the circumstances are serious enough that prosecution is a likely outcome. The Council will retain discretion as to whether PACE interviews would offer such evidence to progress the case.

Rental bidding

From 1 May 2026, landlords or letting agents will not be allowed to ask for, encourage or accept an offer that is higher than the advertised rent. If someone offers to pay more than the advertised rent for a property, this is known as 'rental bidding'.

Advertising a property

A specified rental amount will need to be included when advertising or offering in writing a property to let. It will need to be a specific amount as a price range will not be allowed.

A written advert may be:

- an online property advert.
- a printed advert.
- a social media post.
- any digital communication, for example, emails, text messages or direct messages.

It does not include 'to let' signs outside a property.

After a property has been advertised

After a property has been advertised, you will not be allowed to:

- ask for offers above the advertised rent.

- publish a price range for the property and ask tenants to bid within that range, or higher.
- encourage someone to offer more than the advertised rent.
- tell someone you have received other bids to encourage them to bid more than the advertised rent.
- act in any way that leads a person to believe they need to offer more than the advertised rent.
- accept an offer to pay more than the advertised rent.

If someone offers more than the advertised rent

The relevant person will not be able to accept an offer that is more than the advertised rent. If this is suspected the Council may use their investigatory powers as defined in section 6 of this policy.

If the council agrees that rental bidding has happened, they may issue a civil penalty notice of up to £7,000 for your first offence.

You could be fined for a 'repeated breach' if you commit the same offence within 5 years. If you are fined for a 'repeated breach', you will have to pay:

- up to £7,000 for the breach on its own.
- up to £7,000 if you repeat the same type of breach within 5 years.

Rental discrimination

Rental discrimination is the unfair treatment of people in the private rented sector who have children or receive benefits. Decisions based on something believed to be true, such as that a tenant has children or receives benefits, are still discrimination, even if the belief is false.

References to landlords include anybody acting on their behalf, such as a letting agent, referencing service or family members.

The new measures apply to all assured and regulated tenancies on and from 1 May 2026. It does not matter if they were agreed before or after this date.

All discriminatory terms in superior leases (such as between a landlord and their freeholder, or where a rent-to-rent arrangement is in place) and mortgage agreements are cancelled on and from 1 May 2026. This means they can no longer be used to justify discrimination against a tenant with children or receiving benefits. It does not matter if they were agreed before or after this date.

Discriminatory terms in insurance contracts are cancelled where they are agreed or renewed on and from 1 May 2026. This means they can no longer be used to justify discrimination against a tenant with children or receiving benefits.

These measures apply to all landlords or agents in England who let out properties on assured and regulated tenancies. This includes tenancies offered by or on behalf of the Crown Estate, but not the Parliamentary Estate, nor those of social or supported housing.

Landlords or anybody acting on their behalf may be found liable for a breach of these measures, whether formally contracted or just a family member acting informally.

A person or firm cannot be liable for discrimination if they only carry out one or more of the following, and nothing else:

- publishing adverts or disseminating information.
- providing a means for landlords to communicate directly with prospective tenants.
- providing a means for prospective tenants to communicate directly with landlords.

This means that websites which host property adverts only are not caught by the rental discrimination restrictions. Additional exempted conduct may be defined at a later date.

Which renters are protected

The rental discrimination measures prevent landlords and agents acting on their behalf from providing unfair treatment to renters, both sitting or prospective, based on their having children or receiving benefits.

Children - means anyone under 18 years old who would either visit or live at the property.

Discrimination may also take more specific forms, such as by targeting:

- children of certain ages or characteristics.
- other specific subsets of children such as those in fostering arrangements.

Benefits - includes (but is not limited to) any of the following benefits:

- Universal Credit.
- Jobseeker's Allowance.
- Personal Independence Payment.
- Employment and Support Allowance.
- Income Support.
- Legacy Housing Benefit.
- State Pension or Pension Credit.
- Council Tax Support.

- Tax Credits (Child and Working).
- Child Benefit.
- Guardian's Allowance.
- Carer's Allowance.

The full definition of a benefits claimant, as found in the act, is any person who receives payments by virtue of (including regulations made under):

- the Social Security Contributions and Benefits Act 1992.
- the Welfare Reform Act 2012.
- the Jobseekers Act 1995.
- the State Pension Credit Act 2002.
- the Tax Credits Act 2002.
- the Welfare Reform Act 2007.
- the Pensions Act 2014.
- a council tax reduction scheme under 13A of the Local Government Finance Act 1992.

What is considered unlawful discrimination

Landlords and anyone acting on their behalf must not take steps that intend to make a person less likely to enter a tenancy agreement because they have children or receive benefits. This includes (but is not limited to) stopping them:

- accessing information about a property, including its availability
- viewing a property
- signing a tenancy agreement

The only exceptions are:

- If that property is subject to an existing insurance contract signed before 1 May 2026 which contains a term that prevents occupation by children or benefit claimants. This exception ends when the insurance is renewed or ends.
- If stopping children from living in the property would be a proportionate means of achieving a legitimate aim (PMLA), such as if it would genuinely be unsuitable or cause overcrowding.

Discriminatory terms in tenancies

Any terms in an assured or regulated tenancy, or in the superior lease of a property that is let under an assured or regulated tenancy, that stop tenants from claiming benefits or having children at the property are no longer valid and cannot be used to justify discrimination, unless one of the exceptions applies.

Discriminatory terms in mortgages

Any terms in the mortgage of a property let under an assured or regulated tenancy that stop tenants claiming benefits or having children at the property will no longer have any effect and so cannot be used to justify discrimination.

Discriminatory terms in insurance

Any terms in an existing insurance contract of a property let under an assured or regulated tenancy that stop tenants from claiming benefits or having children at the property only has effect until the insurance ends or is renewed, whichever happens sooner.

For insurance contracts that are renewed or start after 1 May 2026, clauses which exclude children or benefit claimants are of no effect so cannot be used to justify discrimination.

What is not considered unlawful discrimination

Consideration of income

Landlords can take a tenant's income into account when considering if the rent is affordable. They are not liable for a breach if a set income requirement is not met, regardless of whether the person has children or receives benefits.

If the prospective tenant complains to their local authority about a refusal to offer a tenancy because the use of an income test was discriminatory, the local authority should consider if:

- the prospective tenant has demonstrated that they could meet the set income requirement
- the landlord has accounted for all forms of income, including state benefits and pension, and treated them of equal value
- the requirement has been raised because the person has children or receives benefits

When deciding between multiple prospective tenants who have met the income requirements, landlords should not consider whether they receive benefits or have children in reaching their decision.

Landlords should set the same income requirement for all prospective tenants and treat all forms of income equally. It is up to the prospective tenant to demonstrate they meet this requirement, but landlords should take all forms of income into account. Landlords should not unreasonably refuse to accept a means of evidencing income

that a tenant provides, whether a bank statement, proof of benefit letter, pay slip or otherwise.

Proportionate means of achieving a legitimate aim (PMLA)

In certain cases, landlords may stop children from living in a property if they can demonstrate that the restriction is a proportionate means of achieving a legitimate aim. There is no such exception made for discrimination against benefits claimants.

Determining if a 'no children' restriction is a PMLA is up to the relevant local authority for the purposes of imposing a penalty. This decision may be reviewed by the tribunal if a penalty is subsequently appealed. Some examples are included towards the end of this section. Local authorities should evaluate:

- if the intended aim is legitimate
- if restricting occupation by children would achieve that aim
- if the restriction is proportionate

Deciding if an aim is legitimate

Landlords can restrict children living in their properties if it is a proportionate means of achieving a legitimate aim. To be considered sufficiently legitimate, the limit has to be genuine and not in itself aim to discriminate against families with children.

Common examples will include retirement homes and student housing. Another example could be that a property would be unsafe for children. This could be for various reasons, including the construction of the property posing dangers for younger children that cannot be readily mitigated, or safeguarding concerns over shared facilities or common parts in the building. There might also be other statutory requirements the landlord has to meet, like house in multiple occupation (HMO) licensing conditions or overcrowding regulations.

When deciding if an aim is legitimate, The Council will consider if:

- the aim appears to provide some form of genuine benefit
- the aim does not appear itself to be intended to discriminate against families with children

For a restriction to be legitimate, someone other than the landlord must benefit. For example, providing peaceful retirement living, proximity to a university, or the safety of a child. A financial aim alone, such as to lower business costs, is not legitimate, neither is where the purpose itself is to negatively discriminate.

Deciding if the restriction is proportionate

After deciding that the aim of a restriction is legitimate, The Council must decide if it is a proportionate way of achieving it.

When deciding if an aim is proportionate, The Council should consider if:

- there are ways the restriction could be limited
- there are other ways of achieving the aim

For a restriction to be proportionate, landlords should have considered if there are other ways of achieving the same goal. If there are no reasonable alternatives, the restriction should be suitably limited. For example, whether they ban all children from living at the property or those of certain ages.

Enforcement

The Council may issue a civil penalty against the prospective landlord or anyone acting on their behalf if they are satisfied that the breach was either:

- committed with their consent or knowledge
- due to their neglect

The Council may decide to impose a single penalty on more than one person for the same breach or offence. Where they do so, those people are jointly and severally liable to pay it. A financial penalty will be issued in accordance with the Council's approach to issuing civil penalties.

Gathering evidence

The Council will need to decide what sort of evidence to gather to support or reject a case, although how best to do so may be determined locally. Local authorities should compile any evidence provided by the alleged victim and draw up and confirm a witness statement. Once a case of discrimination takes shape, this should be put to the landlord or agent who can offer evidence in their defence.

The Council has powers to request information and enter business premises to support their investigations as specified in [link to investigatory powers section](#)

When reporting discrimination, tenants should provide:

- timestamped copies of communications with the landlord or property agent, such as text messages, voicemails or emails
- copies of, or links to, discriminatory adverts or property listings, dated where possible

Evidence that the tenant receives benefits or has children is not necessary. This is because discrimination is still deemed to have taken place even if on a false belief that a tenant has children or receives benefits.

When defending themselves, landlords and anyone acting on their behalf should provide all relevant documentation which supports the validity of their decision or actions. This may include:

- time-stamped copies of communications with the prospective tenant, such as text messages, voicemails, or emails, or copies of adverts or property listings, dated where possible
- legal documents such as the property deed, statement of licensing conditions or an insurance contract
- informal documents such as a brochure clearly designating the property as part of a retirement or student accommodation facility

Landlords are not entitled to claim any related costs, such as for obtaining a deed from the Land Registry.

Other routes tenants may take

Tenants can contact a letting agent redress scheme or enter into civil proceedings themselves. The Council can share any of their own evidence or findings in support of these proceedings where appropriate.

In addition to the civil penalties local authorities can impose, redress schemes and the courts have powers to direct landlords to make things right. This may include an apology or financial compensation.

Rent Repayment Orders

A rent repayment order (RRO) allows tenants and local authorities to receive up to 2 years' worth of rent from a landlord who has committed certain housing related offences.

The purpose of RROs is to deter landlords from committing offences and empower tenants and local authorities to take action when a landlord breaks certain laws.

The Renters Rights Act 2025 has extended the powers provided in the Housing Act 2004 and the Housing and Planning Act 2016. Rent Repayment Orders (RROs) now apply to all the following offences:

- Section 72(1) of the Housing Act 2004 - unlicensed HMOs.
- Section 95(1) of the Housing Act 2004 - unlicensed houses.
- Section 30(1) of the Housing Act 2004 - Failure to comply with an Improvement Notice.

- Section 32(1) of the Housing Act 2004 - Failure to comply with a Prohibition Order.
- Sections 1(2), (3) or (3A) of the Protection from Eviction Act 1977 - Illegal eviction and harassment of occupiers.
- Section 6(1) of the Criminal Law Act 1977 - Violence for securing entry.
- Section 21 of the Housing and Planning Act 2016 - Breach of a Banning Order.
- Section 16J (1) of the Housing Act 1988 - Knowingly or recklessly misusing a possession ground.
- Section 16J(2) of the Housing Act 1988 - Letting or marketing of a property within twelve months of using the 'moving in' or 'selling' ground of eviction.
- Section 16J(3) of the Housing Act 1988 - Continuous breach of certain tenancy reform requirements.

Further details can be found here: [Rent repayment orders: guidance for local authorities - GOV.UK](#)

Appendix 3 - The Housing Act 2004

The Housing Act 2004 provides in Part 1 the statutory minimum standard for all homes in England and Wales. This is determined by the Housing Health and Safety Rating System (HHSRS) [Housing health and safety rating system \(HHSRS\) enforcement guidance: housing conditions - GOV.UK](#)

HHSRS is a calculation of the effect of 29 possible hazards to the health of occupiers. The legislation provides a range of actions for addressing identified hazards.

The Council will consider the results of the HHSRS assessment when deciding on the most appropriate approach to enforcement. Discretion is exercised as appropriate and each case considered on its own basis.

How the Council will enforce this legislation

However, the Council has a statutory duty to act in cases of Category 1 hazards. The options available to the Council to enforce Category 1 hazards are set out below.

Where a property contains a number of more modestly rated Category 2 hazards which appear to create a more serious situation when looked at together, the situation may be deemed unsatisfactory and in need of action. This is because the occupants encounter one hazard after another as they move around.

The Council will also normally seek to deal with any significant Category 2 hazards (D, E and F) identified at an address, whether or not Category 1 hazards are also present.

In situations where a landlord fails to comply with a formal notice requiring remedial works, the Council may undertake these works in default of the owner and take steps to recover any costs incurred. This power may be exercised in addition to any formal proceedings taken for non-compliance with this notice.

Where there is a Category 1 HHSRS hazard present that is considered to represent an imminent risk of serious harm to the health and safety of the occupiers of a dwelling, the Council may serve an Emergency Prohibition Order or take Emergency remedial action. Such emergency actions would involve either the removal of certain defects giving rise to the immediate risk or the closure of all or part of a dwelling.

The Council will normally charge where legislation permits the recovery of costs for serving statutory notices.

Hazard Awareness Notices

When only minor or moderate Category 2 hazards are identified under HHSRS, an informal approach to enforcement is likely to be adopted.

Improvement Notices

Where the Council determines that an Improvement Notice should be served in respect of a HHSRS determined Category 1 Hazard, it will:

- Require works that will either remove the hazard entirely or reduce its effect so that it ceases to be a Category 1 hazard.

Where the Council determines that an Improvement Notice should be served in respect of a Category 2 Hazard, it will:

- Require works it considers sufficient either to remove the hazard or reduce it to an appropriate degree.

Prohibition Orders

Prohibition orders can be used in respect of both Category 1 and Category 2 hazards

Emergency Remedial Action & Emergency Prohibition Orders

May be used specifically where the Council is satisfied that:

1. A Category 1 hazard exists
2. The hazard poses an imminent risk of serious harm to health or safety
3. Immediate action is necessary.

Demolition Orders

Demolition orders provide the Council with the power to make an order to demolish a building. They are as a possible response to a Category 1 hazard (where they are judged the appropriate course of action). In determining whether to issue a Demolition Order, the Council will take account of Government guidance that is applicable at the time and will consider all the circumstances of the case.

Clearance Areas

Clearance Areas can be declared if the Council is satisfied that each of the premises in the area is affected by one or more Category 1 hazards (or that they are dangerous or harmful to the health and safety of inhabitants as a result of a bad arrangement or narrowness of streets). In determining whether to declare a Clearance Area, the Council will act only in accordance with Section 289 of the Housing Act 1985 (as amended) and having had regard to relevant Government guidance on Clearance Areas and all the circumstances of the case

Houses in Multiple Occupation (HMOs)

Part 2 of the Housing Act 2004 introduced a mandatory licensing system for certain types of Houses in Multiple Occupation (HMO) with the aim to ensure that every licensable HMO is safe for the occupants and visitors and is properly managed.

Since 2018 owners of HMOs with five or more occupants must apply to the Council to have their properties licensed. The responsibility for applying for a licence rests with the person having control of or the person managing the property.

The Housing Act 2004 also provides the Council with the power to apply Additional Licensing of HMOs based on specific conditions being met. In May 2025 the Council renewed an Additional Licensing Scheme that requires all HMOs in the City to be licensed. Further details relating to this scheme can be found [here](#) .

HMO Licensing offences

The Housing Act 2004 sets out a number of licensing related offences all of which are criminal offences and will be investigated by the Council. These include:

- Section 72(1) – Operating an unlicensed HMO
- Section 72 (2) – Knowingly permitting the HMO to be occupied by more persons than the licence allows
- Section 72(3) – Failing to comply with a licence condition; and
- Section 238 – Providing false or misleading information to the local housing authority (including in connection with HMO licensing)

Temporary Exemption Notices

Where a landlord is or shortly will be taking steps to make an HMO non-licensable, the Council may serve a Temporary Exemption Notice (TEN). A TEN can only be granted for a maximum period of three months. In exceptional circumstances, a second TEN can be served for a further three-month period. A TEN will be considered where the owner of the HMO states in writing that steps are being taken to make the HMO non-licensable within 3 months.

Interim and final management orders

An Interim Management Order (IMO) transfers the management of a residential property to the Council for a period of up to twelve months. The circumstances in which an order can be made are set out below. In particular, the IMO allows the Council possession of the property against the immediate landlord, and subject to existing rights to occupy can;

- Do anything in relation to the property, which could have been done by the landlord, including repairs, collecting rents etc.
- Spend monies received through rents and other charges for carrying out its responsibility of management, including the administration of the property
- To create new tenancies (with the consent of the landlord).

Under an IMO the Council must pay to the relevant landlord (that is the person(s) who immediately before the order was made was entitled to the rent for the property) any surplus of income over expenditure (and any interest on such sum) accrued during the period in which the IMO is in force. It must also keep full accounts of income and expenditure in respect of the house and make such accounts available to the relevant person.

The Council **must** take enforcement action in respect of a licensable property (which means an HMO subject to Part 2, or other residential property subject to Part 3) by making an IMO if:

- the property ought to be licensed, but is not, and the Council considers there is no reasonable prospect of it granting a licence in the near future; and/or
- the Health and Safety Condition isn't met and, therefore, it would not have granted an application for a licence.

An IMO may not, however, be made on these grounds if an effective application is outstanding with the authority for the grant of a licence or a Temporary Exemption Notice or if such a notice is in force.

Final management orders

In exceptional circumstances, the Council can also apply to the First-Tier Tribunal for a Final Management Order (FMO) which can last for up to five years. Such powers will only be used in exceptional circumstances and will be authorised through the appropriate method.

Management order management schemes

The Council must adopt a management scheme for a property subject to an FMO. The scheme must set out how the Council intends to manage the house.

In particular, the management scheme must include:

- The amount of rent it will seek to obtain whilst the order is in force;
- Details of any works which the Council intends to undertake in relation to the property;

- The estimate of the costs of carrying out those works;
- Provision as to the payment of any surpluses of income over expenditure to the relevant landlord, from time to time; and
- In general terms how the authority intends to address the matters that caused the Council to make the order.

The Council must also keep full accounts of income and expenditure in respect of the house and make such accounts available to the relevant landlord.

Management of HMOs

Landlords and managers of Houses in Multiple Occupation (HMOs) are legally required to properly manage their properties to ensure the safety, welfare, and good management of the tenants. Key legislation includes the Housing Act 2004 and two sets of regulations made under it:

- The Management of Houses in Multiple Occupation (England) Regulations 2006.
- The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 – applying to certain Section 257 HMOs (buildings converted into self-contained flats that don't meet 1991 Building Regs standards).

These regulations set out a series of duties that HMO landlords/managers must fulfil. In essence, the manager is responsible for fire safety, general property maintenance, provision of utilities, hygiene and waste disposal, and information for tenants. The Council enforces these rules through licensing, inspections, and formal enforcement.

HMO Management Regulations

The below summarises each main duty placed on HMO landlords or managers by the 2006 Regulations (and similarly by the 2007 Regulations for converted buildings).

Regulation 3 – Information to Occupiers

Display the manager's name, address, and telephone number prominently in the HMO, so every household knows who to contact.

Regulation 4 – Safety Measures

Take all required measures to protect tenants from fire and other injuries. This means keeping fire escape routes clear and in good repair, maintaining fire alarms and firefighting equipment in working and posting clear fire escape signs (in properties with more than 4 occupants). The manager must also address other hazards – e.g. secure any unsafe features (repair or block access to an unsafe balcony and install window bars or guards if a low window poses a danger).

Regulation 5 – Water Supply & Drainage

Ensure the HMO has a constant water supply and effective drainage. Water tanks and cisterns must be kept *clean*, covered, and in good condition (e.g. protect pipes from freezing). The water supply (and drainage) to tenants must not be unreasonably interrupted by the manager except for necessary repairs.

Regulation 6 – Gas & Electrical Safety

Ensure gas and electrical utilities are safe. The manager must obtain an annual Gas Safe certificate for all gas appliances and, if the council asks in writing, supply the latest gas safety test certificate within 7 days. The manager must not unreasonably interrupt the gas or electricity supply to any occupier (for example, not cutting off power as a threat or for minor nuisances). Note: Electrical installations should be maintained safely (and under separate regulations, landlords must have 5-yearly electrical safety checks, though that is outside the 2006/2007 regs).

Regulation 7 – Maintain Common Areas

Keep all common parts of the HMO (e.g. entrance halls, corridors, staircases, kitchens, bathrooms shared by tenants) in good repair, safe, and clean condition. Floors, stairs, handrails, windows, lighting, and shared facilities must be kept in safe working order. For example, stairs should have secure handrails and fixed, safe coverings; hallways should have adequate lighting at all times for occupants. Shared yards, gardens and boundaries also must be maintained – any outbuildings, yards, or forecourts used by tenants should be kept in tidy, sound condition, gardens safe, and fences or railings in good repair (so they don't pose a danger). Even any part of the HMO that is not currently in use must be kept reasonably clean and free of rubbish.

Regulation 8 – Maintain Living Accommodation (Individual Rooms)

Ensure each letting/unit is clean and suitable at the start of a tenancy. During occupation, the manager must keep the internal structure, fittings and appliances of each rented unit in good repair and working order (for instance, fix leaking pipes or broken windows in a tenant's room). Windows and ventilation must also be kept in good repair.

Exception: The manager isn't required to repair damage caused by tenants not living "in a tenant-like manner" (i.e. misuse or deliberate damage), but they must address normal wear-and-tear issues.

Regulation 9 – Waste Disposal

Provide adequate bins or refuse receptacles for the number of households in the HMO and ensure there are proper arrangements for rubbish collection and disposal. In practice, this means the manager must set up waste collection (usually via the council's refuse service) and make sure tenants know how to dispose of waste correctly. Rubbish must not be allowed to build up and litter the property.

(The 2007 regulations for Section 257 HMOs mirror the above duties, with similar requirements for managers of converted buildings.)

Penalties for Non-Compliance

Failing to carry out these HMO management duties is a criminal offence. Unlike some housing offences, breaches of the HMO management regulations are strict liability – the Council does not have to serve an improvement notice first; if a duty isn't complied with, the offence is committed. Each separate regulation breached counts as a separate offence.

Legal consequences

If convicted in court, landlords or managers can face unlimited fines for each offence (magistrates' courts were given power in 2015 to issue fines without an upper cap).

Alternatively, the Council can impose a financial penalty instead of prosecution. Since 2017, councils in England can issue a civil penalty up to £30,000 per offence for HMO management breaches. These hefty fines are intended to deter poor management.

Breaching management duties can also affect the manager's HMO licence (if one is required for the property). Councils may revoke a licence or refuse to renew it if the licence holder breaches these regulations.

In severe cases of sustained non-compliance, the Council will use enforcement tools like Improvement Notices (to require specific repairs or safety measures) or even take over management of the property through Interim and Final Management Orders in extreme circumstances (if health and safety is at serious risk). These steps aim to protect tenants when a landlord utterly fails to meet obligations.

Fire Safety in HMOs

Statistically, HMOs have one of the highest incidents of deaths caused by fire in any type of housing. It is therefore essential that any HMO possesses an adequate means of escape in event of a fire and adequate fire precautions. The actual level of fire protection and detection required will be determined by a fire risk assessment. The Safer Housing and Communities Service is generally the lead enforcing authority for fire safety in HMOs, however where an HMO contains communal areas, it will consult with West Midlands Fire and Rescue service to determine if a more detailed Fire Risk Assessment is required.

Selective Licensing

The Housing Act 2004 provides the Council with a power to introduce Selective Licensing based on specific conditions being met. Should an area within Coventry ever become subject to Selective Licensing, a specific enforcement policy will be developed to accompany any designation.

Appendix 4 - Housing and Planning Act 2016

This Act provides Coventry City Council with additional powers and amends existing powers within the Housing Act 2004. The Council will implement these where appropriate in accordance with statutory guidance provided by Government and its policies and procedures.

Database of Rogue Landlords

The database is designed to be a tool which will help the Council to keep track of rogue landlords and focus its enforcement action on individuals and organisations who knowingly flout their legal obligations.

The duties and powers available to the Council with regard to the database of rogue landlords and property agents (“the database”) are set out under the provisions in Chapter 3 of Part 2 of the Housing and Planning Act 2016 (“the Act”). The information that must be included in an entry on the database is described in the Housing and Planning Act 2016 (Database of Rogue Landlords and Property Agents) Regulations 2018

The Council must have regard to the criteria in the statutory guidance in deciding whether to make an entry in the database under section 301 of the Act, and the period to specify in a decision notice under section 312 of the Act.

The Council will add an entry onto the rogue landlord database in respect of a person who receives a banning order. This is a statutory requirement.

The Council will have regard to the guidance set out above when deciding whether or not to exercise its discretionary power to make an entry onto the rogue landlord database in respect of a person who receives two or more financial penalties in the same year or is convicted of a Banning Order offence.

The statutory guidance sets out the criteria to which the Council must have regard in deciding whether to make an entry under section 30 of the Act.

In deciding the period of time for which the entry will be maintained i.e. remain on the rogue landlord database, the Council will have regard to the following factors:

- Severity of the offence
- Culpability and serial offending
- Deter the offender from repeating the offence
- Mitigating factors
- Aggravating Factors

Where the Council has made the decision to exercise its powers under the Act to make an entry on the database, it will use the following steps and considerations to determine the length of time that the subject should be added to the database:

- Assess the effect of a) above – the severity of the offence and b) above - the culpability and serial offending using Table 11 below.

Table 11 – Rogue Landlord Database Offences Matrix

Culpability and serial offending	Low severity of Offence	Medium severity of Offence	High severity of Offence
Very High	10yrs	10yrs	15yrs or more
High	5yrs	10yrs	10yrs
Medium	2yrs	5yrs	10yrs
Low	2yrs	2yrs	5yrs

- Apply any mitigation (reduction) presented in relation to the initial calculation and recalculate as necessary.

The Council may reduce the time if mitigating factors are prevalent.

The calculated timescale of an entry on the database cannot be less than 2 years as the minimum timescale for an entry on the database for a person convicted of a Banning Order offence is two years beginning on the day that the entry is made. The calculated timescale for the duration of a Banning Order cannot be less than 12 months.

The matrix allows for a banning of 15 years or more to be considered. In the very worst cases Coventry City Council may apply for an indefinite ban.

This Council must remove an entry it made if all the convictions on which the entry was based have been overturned on appeal or if or ordered to do so by the First Tier Tribunal.

In some circumstances, the Council has the power to remove or vary an entry on the database including reducing the period for which the entry it made must be maintained. In those circumstances, the Council will consider the same factors set out in this policy to be used, when making the decision whether or not to make an entry on the database and the same factors of how long an entry shall remain on the database.

The procedures the Council must follow are set out in the Act. There are legal rights of appeal set out to the First Tier Tribunal in relation to decisions the Council makes to use its powers in relation to the database.

Banning Orders

From 6 April 2018, a Local Authority has the power to apply to the First-Tier Tribunal for a banning order.

A Banning Order is an order that bans a landlord or property agent from:

- Letting housing in England;
- Engaging in English letting agency work;
- Engaging in English property management work; and
- Doing two or more of those things. Breach of a banning order is a criminal offence.

A Banning Order must be for a minimum period of 12 months. There is no statutory maximum period for a Banning Order.

The Council will use banning for the most serious offenders who breach their legal obligations and rent out accommodation, which is substandard and where previous sanctions, such as a prosecution has not resulted in positive improvements and it is necessary for the Council to proceed with further prosecutions/ formal action.

Part 5 of the Housing and Planning Act 2016 covers a range of measures including changes to the 'fit and proper person' test applied to landlords who let out licensable properties and allowing arrangements to be put in place to give authorities in England access to information held by approved Tenancy Deposit Schemes with a view to assisting with their private-sector enforcement work.

Table 12 below sets out the statutory offences where the Council may apply for a Banning Order.

Table 12 – Banning Order Offences

Statute	Provision	Offence
Protection of Eviction Act 1977	Section 1(2), (3) and (3A)	Unlawful eviction and harassment of occupier
Criminal Law Act 1977	Section 6(1)	Violence for securing entry
Housing Act 2004	Section 30(1)	Failing to comply with an improvement notice
Housing Act 2004	Section 32(1)	Failing to comply with a prohibition order
Housing Act 2004	Section 72(1), (2) and (3)	Offences in relation to licensing of Houses in Multiple Occupation
Housing Act 2004	Section 95(1) and (2)	Offences in relation to licensing of houses under Part 3

Statute	Provision	Offence
Housing Act 2004	Section 139(7)	Contravention of an overcrowding notice
Housing Act 2004	Section 234(3)	Failure to comply with management regulations in respect of Houses in Multiple Occupation
Housing Act 2004	Section 238(1)	False or misleading information
Regulatory Reform (Fire Safety) Act 2005	Article 32(1) and (2)	Fire safety offences
Health and Safety Act 1974	Section 33(1)(c) where a person contravenes any requirement specified in regulation 36 of the Gas Safety (Installation and Use) Regulations 1998	Gas safety offences - duties on landlords
Immigration Act 2014	Section 33A (1) and (10)	Residential tenancies – landlord offences
Immigration Act 2014	Section 33B (2) and (4)	Residential tenancies – agent offences
Fraud Act 2006	Section 1(1)	Fraud
	Section 6(1)	Possession etc. of articles for use in frauds
	Section 7(1)	Making or supplying articles for use in frauds
Fraud Act 2006	Section 9(1)	Participating in fraudulent business carried on by sole trader etc.
	Section 11(1)	Obtaining services dishonestly
	Section 12(2)	Liability of company officers for offences by company

Appendix 5 - Supported Housing (Regulatory Oversight) Act 2023

The Supported Housing (Regulatory Oversight) Act 2023 has been enacted and provides for

- Local Authorities in England to review supported housing in their areas and develop strategies for Supported Exempt Housing.
- Creation of the national expert advisory panel to advise on matters related to supported Housing.
- Gives the secretary of state power to introduce national support standards for any provision of supported exempt accommodation (subject to further consultation).
- Gives local Authorities power to create local licensing schemes for exempt accommodation (subject to further consultation).
- Gives the Secretary of state an option to introduce a new planning use-class for exempt accommodation.
- Changes to Housing Act 1996 (becoming homeless intentionally) if the accommodation ceases to occupy is supported accommodation, if the standard of accommodation is the reason for the occupation ceasing and if the accommodation or the care, support and supervision provided does not meet the National Supported Housing Standards the person ceasing the accommodation cannot be deemed intentionally homeless.

Supported Exempt Accommodation is operating in various house types, included self-contained flats, shared HMO accommodation, single household accommodation and purpose-built accommodation.

Supported exempt accommodation is defined under Housing Benefit Regulations. To be defined as supported exempt accommodation:

- The landlord must be a voluntary organisation, a registered community interest company (CIC) or registered provider (Housing association).
- The landlord must have a legal interest in the property concerned whether this be ownership or lease.
- The tenant must need care, support or supervision.
- The 'support' to meet these needs must be provided by the landlord or on its behalf.

Supported exempt accommodation is currently visited and scrutinised by a multi-disciplinary team made up of a member of Safer Housing and communities, Supported exempt accommodation officer in the Housing Benefit Team and a Quality officer in the Housing Homelessness team. Providers and their properties are visited to ensure their properties are safe and compliant, support provider is scrutinised to ensure good

quality support is provided and rent payments are reviewed to ensure value for money and providers are compliant with Housing Benefit Regulations.

Licensed Supported accommodation

Currently where a property meets the definition of an HMO the Council requires them to be licensed in accordance with its Additional HMO Licensing Scheme until such time that the Supported licensing regime is implemented. These properties are subject to licence conditions and are checked to ensure compliance regularly. Schedule 14 of the Housing Act sets out the buildings that are not HMOs for the purpose of the act. This includes properties managed or controlled by registered social landlords.

The Housing health and safety rating system (HHSRS)

All properties not subject to HMO licensing will be visited and an HHSRS assessment carried out under the Housing Act 2004 to ensure the property is safe and compliant. All HMO's will also be subject to a HHSRS assessment to ensure the property is safe and compliant. When a category 1 hazard is found the council have a duty to take action to remove the hazard, when a category 2 hazard is found the council have discretion whether to take any further action.

Appendix 6 - Protection from Eviction Act 1977

The Protection from Eviction Act defines unlawful eviction and harassment of residential occupiers and creates a criminal offence for breach of sections 1-4 of the Act.

The legislation now falls within the scope of the Renter Right Act 2025 and places a duty on the Council to investigate cases of unlawful eviction or harassment.

The Act specifically states:

- *Any person with the intent to cause the residential occupier of any premises and any person who knows, or has reasonable cause to believe the conduct committed is likely to cause the residential occupier or members of his family:*
 - *To give up the occupation of the premises or any part thereof; or*
 - *To refrain from exercising any right or pursuing any remedy in respect of the premises or part thereof; or*
 - *Does acts calculated to interfere with the peace or comfort of the residential occupier or members of his household; or persistently withdraws or withholds services reasonably required for the occupation of the premises as a residence, shall be guilty of an offence.*

Residential occupiers occupying a privately rented property under the provisions of a tenancy as defined by the Housing Act 1988 are entitled to:

- exclusive possession of the property,
- to enjoy the property without interference to either their peace or comfort, and
- not to be unlawfully evicted from it.

Where a person makes a complaint to the Council and that complaint falls within the definition outlined above, an officer authorised by the Council may use investigatory powers as outlined in this policy in order to investigate the matter and establish what evidence exists to prove the offence. The authorised officer may utilise a range of powers to gather evidence, including issuing formal documents requesting information, entering premises with or without warrant (subject to legal conditions) and seize documents and records necessary for enforcement action.

The duty placed on the Council by the Renters Rights Act 2025 is to investigate cases of unlawful and harassment. Cases will only proceed where the case meets the evidential threshold for criminal cases and where the authority is satisfied that it meets the public interest test as defined in the Code for Crown Prosecutors.

The Council will also assess the reliability and credibility of witnesses in determining whether to progress a case beyond the investigation stage.

Section 2- Unlawful Eviction

Section 2 of the Act broadly covers the physical act of changing the locks to a property or preventing occupation without proper authority to do so. A residential occupier is anyone who occupies a property and is NOT an excluded occupier for the purposes of the act (see excluded occupiers' section below)

Proper authority means a bailiff from the county court or high court sheriff with either a warrant of eviction or a writ.

This section of the Act does not exclusively cover lock changes, it can also cover acts such as boarding up a property, placing objects in front of doors, adding padlocks to doors or gates, changing key codes whilst not providing these to the occupier, physically preventing occupation by standing between the tenant and the door to their property. It can be any act that prevents the occupier from physically re-entering the premises.

Section 2 of the Act also covers attempts to illegally evict. It is also important to note that this offence can be committed by any person and not just the landlord of the property.

Section 3- Harassment

Section 3 of the Act covers scenarios where any person does acts likely to interfere with the peace or comfort of the residential occupier or members of his household or persistently withdraws or withholds services reasonably required for the occupation of the premises as a residence.

Section 3A is largely the same as Section 3 of the Act but specifically relates to scenarios where the landlord has committed the harassment directly.

Examples of harassment could be:

- removing fuses from a consumer unit or withholding amenities such as electric, gas or water,
- removing windows from a property,
- sending a text message to a tenant telling them to leave,
- sending unlawful eviction notices on more than one occasion,
- interfering with internet, thermostat or similar,
- tacit bullying via the use of social media,
- discussing rent arrears with neighbours or other parties with authority.

Harassment under this section of the Act typically refers to a course of conduct which in law is two or more incidents of harassment. The two incidents can be of differing types so, for example a phone call telling a tenant to leave and a text message would be sufficient to complete the offence. It is important to note that the definition and scope of harassment covers a huge range of behaviours and therefore each case will be assessed individually to determine if the specified activity meets the definition of the Act.

It is also worth noting that the Renters Right Act 2025 makes out a separate breach for giving verbal or unlawful notice to a tenant. If a person gives unlawful or verbal notice on one occasion, this is likely to be a breach of the Renters Rights Act 2025 and attracts a financial penalty of substantially less than an offence under the Protection from Eviction Act 1977 (see schedule of breaches below).

There are occasions where a landlord may continue a campaign of harassment, in this case providing the evidential threshold is met for the offence, The Council may take further action under the provisions of the Protection from Eviction Act 1977 which attracts a higher penalty.

Where conduct falls within Section 2 of the Act there is no requirement to demonstrate a course of conduct, this can be a single isolated incident.

Excluded Occupiers

The Protection from Eviction Act 1977 applies to all residential tenancies other than those specified as “excluded occupiers” by the Act.

The Act sets out the following categories of excluded occupier:

- people sharing accommodation with a resident landlord.
- former trespassers granted temporary rights to occupy.
- people renting holiday lets.
- people occupying accommodation rent free.
- asylum seekers in UKVI accommodation.
- licensees in public sector hostels.
- people with no right to rent where the Home Office has served notice.

The Act also covers landlords, lettings agents and any person who is believed to be culpable of committing an offence contrary to the provisions of the Act.

An example of this is where a landlord or agent instructs a third party to undertake an unlawful eviction or course of conduct (harassment) by proxy. The person acting as a proxy may also be liable for the offence, however it is important to note that this does not always need to be someone acting as proxy and can be any person whatsoever.

Appendix 7 - Environmental Protection Act 1990

Statutory Nuisance Provisions

If a property is unsafe, causing or is likely to cause a nuisance to the locality, there are several legislative tools available to the Council to ensure that the condition of the property is improved.

Issues that may be a statutory nuisance include:

- noise from premises or from vehicles, equipment or machinery in the street
- smoke from premises
- smells from industry, trade or business premises (for example, sewage treatment works, factories or restaurants)
- artificial light from premises
- insect infestations from industrial, trade or business premises
- accumulation or deposits on premises (for example, piles of rotting rubbish)

For the issue to count as a statutory nuisance it must do one of the following:

- unreasonably and substantially interfere with the use or enjoyment of a home or other premises
- injure health or be likely to injure health

Abatement notices

Coventry City Council must serve an abatement notice on people responsible for statutory nuisances, or on a premises owner or occupier if this is not possible. This may require whoever's responsible to stop the activity or limit it to certain times to avoid causing a nuisance and can include specific actions to reduce the problem.

Appendix 8 - The Prevention of Damage from Pests Act 1949

The Prevention of Damage from Pests Act 1949 (PDPA) places a duty on the Council to keep its area free from rats and mice and provides the Council with the following powers.

Inspection and Monitoring

In the event of a complaint the Council must inspect land and premises to identify infestations of rats and mice, and it may also do so proactively

Serving Notices

If an infestation or conditions likely to attract pests are found, the Council can serve a notice on the owner or occupier requiring them to take specified steps to eradicate pests or remove accumulations (e.g., rubbish or structural defects that allow entry).

Works in Default

If a landlord fails to comply, the Council may carry out pest control measures itself and recover costs from the owner or occupier as a civil debt.

Powers of Entry

Authorised officers can enter land or premises at reasonable times (with 24 hours' notice if occupied) to inspect, enforce compliance, or take remedial steps. Obstruction of these powers is an offence.

Cost Recovery

Expenses incurred by the Council for pest control can be recovered from the property owner or occupier.

Application to the Private Rented Sector

These powers apply equally to private landlords. If a rented property is infested or poses a risk to public health, the Council can:

- Require the landlord to remove infestations and prevent recurrence.
- Address structural defects or accumulations that attract pests.
- Take enforcement action if notices are ignored, including works in default and cost recovery.

Appendix 9 - The Building Act 1984

The Building Act 1984 provides the legal framework for building regulations in England and Wales, ensuring safety, health, and welfare in construction and maintenance. It applies to all buildings, including those in the Private Rented Sector (PRS), and gives local authorities enforcement powers to address dangerous or defective conditions.

Key Powers Relevant to Privately Rented Properties

The Council can exercise the following powers under the Act:

1. Drainage and Sanitation
 - Section 59: Require owners to remedy defective or blocked drainage systems

- Section 64: Ensure provision of adequate sanitary facilities (closets) in buildings.
2. Dangerous or Dilapidated Buildings
- Section 76: Address defective premises that pose health or safety risks.
 - Section 77: Serve notice requiring the owner to make a ruinous or dilapidated building safe.
 - Section 78: Take emergency action to make a building safe if immediate danger exists.
 - Section 79: Require renovation or demolition of ruinous or neglected buildings or sites.
3. Powers of Entry
- Sections 95–96: Authorised officers can enter premises (with notice) to inspect and enforce compliance.
4. Execution of Works
- Section 97: Council can carry out necessary works in default and recover costs from the owner.
5. Service of Documents
- Sections 92–94A: Prescribe how notices and documents are served, including electronic service.

These powers allow the Council to intervene where a rented property is:

- Structurally unsafe or dilapidated.
- Lacking proper drainage or sanitary facilities.
- Posing a risk to health or safety.

Enforcement can include formal notices, emergency works, and cost recovery from landlords who fail to comply.

The Council's may also use the Building Act powers alongside other legislation (Housing Act 2004, Environmental Protection Act 1990) to maintain standards in the PRS. These powers are particularly relevant for empty or neglected properties and cases involving structural hazards.

Appendix 10 - The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022

Section 150 of the Energy Act 2013 empowers the Secretary of State to make regulations that require landlords of residential premises in England to

ensure that, during any period when the premises are occupied under a tenancy, the premises are equipped with smoke and carbon monoxide alarms that meet the appropriate standard, and that checks are made by or on behalf of the landlord in accordance with the regulations to ensure that any such alarms remain in proper working order.

These regulations are known as the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (the Regulations).

How the Council investigates breaches of this legislation

The conditions may come to the attention of the investigating officer either by way of a complaint or during an inspection of premises. Guidance on dealing with complaints is contained in the 'Investigation of Complaints and Service Requests'. Information on inspection of premises is contained in the 'Survey of Residential Dwellings'.

It should be noted the Explanatory Booklet for Local Authorities on the Smoke and Carbon Monoxide Regulations issued by the Department of Communities and Local Government states that 'reasonable grounds' for serving a remedial notice would include being informed by a tenant, letting agent or housing officer that the required alarms are not installed. The regulations do not require the Council to enter the property or prove non-compliance to issue a remedial notice. This is intelligence-led enforcement.

Under these regulations, the 'relevant landlord' of a 'specified tenancy' (including a licence, lease, sub-lease and sub-tenancy), which grants one or more persons the right to occupy, must ensure from 1st October 2015 that:

- A smoke alarm is provided on each storey of the premises on which there is a room used wholly or partly as living accommodation (including bathroom or lavatory)
- A carbon monoxide alarm is provided in any room of the premises which is used wholly or partly as living accommodation and contains a solid fuel burning combustion appliance, and
- Checks are made to ensure that these alarms are in proper working order on the day any new tenancy begins after 1 October 2015.

The regulations do not apply, for example, where a resident landlord shares an amenity with their tenant, nor do they apply to student halls of residence, registered social landlords, hostels, refuges or care homes.

For Houses of multiple occupation any breach of this legislation will be dealt with through the licensing scheme.

As part of a property inspection, the officer should discuss the issues with the occupant as they may be able to add information that isn't readily identifiable from the

visual inspection, i.e. details of any ill-health effects that they may have been suffering that may be linked to carbon monoxide poisoning.

Specifically relating to the 2015 Regulations, the surveying officer should check:

- A smoke alarm is installed to each storey of the premises as required by the regulations
- A carbon monoxide alarm is installed in any room used as living accommodation and where there is a solid fuel burning combustion appliance
- Documents are present relating to the maintenance of the alarms to ensure they were in proper working order at the start of the tenancy, after which the tenant is responsible for their own safety by regularly testing all alarm

If the Council has reasonable grounds to believe a landlord is in breach of the requirements in Regulation 4, it must serve a remedial notice on the relevant landlord.

Where the Council has 'reasonable grounds' to believe that one or more of the points have not been met, it must serve a remedial notice on the landlord. 'Reasonable grounds' includes being informed by a tenant, letting agent or housing officer that the required alarms are not installed.

The regulations do not require the Council to enter the property or prove non-compliance to issue a remedial notice. A remedial notice must be issued if the Council has decided it has reasonable grounds to believe there is a breach).

The remedial notice must specify:

- The premises to which the notice relates
- The duty/duties with which the Council considers the landlord is failing or has failed to comply
- The remedial action the Council considers should be taken
- That action is taken within 28 days of the day the notice is served
- That the landlord is entitled to make written representation against the notice within 28 days of the day of service of the notice
- The person to whom and the address at which any representation may be sent
- An explanation as to:
 - The duty of the landlord to comply with a remedial notice
 - The duty of the Council to arrange remedial action
 - Penalties for a breach, including the maximum penalty charge which the Council may impose.

The notice must be in writing and may be amended, suspended or revoked in writing at any time and is deemed to be served on a landlord on:

- The day that it is given to the landlord in person

- The second business day after the notice was sent by first-class post to the landlord's last known address
- The day it is delivered by hand to the landlord's last known address

The day the notice is sent by email to the landlord where the landlord has provided the Council with an email address at which he/she is content to accept service.

Where a remedial notice is served, the landlord must take the action specified in the notice within the time specified. A landlord is not to be taken to breach the duty if they can prove they have taken all reasonable steps to comply with the duty.

If a landlord can show they have taken all reasonable steps, they will not be in breach of the duty to comply with the remedial notice. If a landlord does not prove they have taken all reasonable steps, it is then up to the Council to decide if they are in breach, by judging this on the balance of probabilities. Whether any evidence provided confirms compliance is for the Council to determine.

If a tenant informs the Council that no remedial action has been taken, it is reasonable for the Council to be satisfied, on the balance of probabilities, that the landlord is in breach.

Where the Council is satisfied, on the balance of probabilities, that a landlord on whom it has served a remedial notice is in breach of the duty, it must, if the necessary consent is given by the occupier, arrange for an authorised person to take the remedial action specified in the remedial notice within 28 days from when the breach has been identified. The authorised person must give not less than 48 hours' notice of the remedial action to the occupier of the premises. The authorised person must produce evidence of identity and authority, if required to do so, by the landlord or occupier.

Enforcement of the Regulations

The Council can impose a civil penalty of up to £5,000 on landlords who do not comply with the remedial notice.

There is no other provision made in the regulations for the Council to redeem costs for any remedial works carried out. Collection of the civil penalty fine is the only method.

The Council must serve a penalty charge notice within six weeks of the day of the breach of the remedial notice. The penalty charge notice must state:

- The reasons for imposing the penalty charge
- The premises to which the penalty charge relates
- The number and type of prescribed alarms (if any) which an authorised person has installed at the premises
- The amount of the penalty charge

- That the landlord is required, within a period specified in the notice:
 - To pay the penalty charge
 - To give written notice to the Council requesting a review the penalty charge notice
 - How payment of the penalty charge must be made
 - Contact details of the person to whom the request for a review and representations should be sent, (including any email address).

The period for payment of the penalty charge must be not less than 28 days. There is provision to reduce the penalty charge for payment within 21 days in line with the Coventry City Council available here (link to how we issue a financial penalty)

The Council must:

- Consider any representations made by the landlord
- Decide whether to confirm, vary or withdraw the penalty charge notice, and
- Serve notice of its decision to the landlord.

The Council may recover the penalty charge on the order of a court as if payable under a court order. As noted above, when the Council issues a penalty notice which carries a right of appeal, they must tell the landlord about that right of appeal.

Determining the amount of the penalty charge (Statement of Principles)

The Council's policy is that the starting point for a penalty charge for a first breach of the Regulations will **£3,000**. The lower limit which all penalties will be levied is £2,500. Therefore, where landlords are able to show certain mitigation, the Council is allowing a reduction to this lower limit rather than applying the starting point as a fixed amount.

The Council will decide what such circumstances might be, taking into account any representations the letting agent and/or property manager makes during the 28 day period following the Council's notice of intention to issue a fine.

Aggravating factors include, but are not limited to:

- The number of alarms not working or missing (the Regulations state there should be one per storey)
- Other fire safety concerns/defects in the property which increase the risk posed to the occupants
- The length of time the offence is believed to have been on-going
- The frequency of complaints by the occupiers to the landlord about the non-working or missing alarms
- The costs of any remedial work the Council have carried out in response to the breach

- Whether the property is let as an HMO (which increases the overall risk)
- The number of occupants living in the property
- Presence of vulnerable occupiers such as elderly, children or disabled people
- Any history of previous enforcement or non-compliance of the landlord
- Attempts to obstruct the investigation

Mitigating factors include, but are not limited to:

- The property being small and low-risk (for example a one-bedroom ground floor flat with a large number of fire escapes including large windows)
- A single occupant living in the property
- Evidence that all required alarms were checked and in working order at the start of the tenancy
- Written evidence that some efforts to gain access and comply with the remedial notice were made and access was prevented by the occupant

Determining the amount of the penalty charge for a subsequent breach

The starting point for penalties for subsequent breaches will not be set, and the Council may decide to issue the maximum penalty of £5,000.

Withdrawing or reviewing a penalty notice after representations

The Council may decide to review its decision to serve a penalty notice, for example when new information comes to light and a landlord also has the right to ask the Council to review its decision to serve a penalty notice. This request must be made in writing.

The penalty notice must tell the landlord how long they have to make this request, and who it must be sent to.

When the Council receives the request, it must consider everything the landlord has said in the request and decide whether or not to withdraw the penalty notice.

The Council must withdraw the penalty notice if:

- It is satisfied that the landlord has not committed the breach set out in the penalty notice;
- although it still believes the landlord committed the breach, it is satisfied that the landlord took all reasonable steps, and exercised all due diligence to avoid committing the breach; or
- it decides that because of the circumstances of the landlord's case, it was not appropriate for the penalty notice to be served.

If the Council does not decide to withdraw the penalty notice, it might decide to waive or reduce the penalty, allow the landlord additional time to pay and must explain the appeals process and how financial penalties can be recovered.

In the event of two or more persons receiving separate Notices of Intent for the same matter, it should be noted that acceptance/payment of a civil penalty by one person will not negate the Council's intention to impose a civil penalty on the second or further persons. Each person served with the Notice of Intent is considered individually liable to pay the civil penalty notified to them. It is therefore important that any recipient of a Notice of Intent takes the opportunity to make representations should they consider for any reason a civil penalty should not be individually imposed upon them.

This approach is taken to ensure consistency in the way the Council enforces the legislation.

In any event, the Council must inform the landlord of its decision in writing, and, should do so at the earliest opportunity.

Where a landlord asks the Council to review a decision to serve a penalty notice and, on review, it decides to uphold the penalty notice, the landlord may then appeal to the First-Tier Tribunal against that decision.

Appendix 11 - The Energy Performance of Buildings (England and Wales) Regulations 2012

The Energy Performance of Buildings (England and Wales) Regulations 2012 requires sellers and prospective landlords to make available, free of charge, a valid Energy Performance Certificate (EPC) to any prospective tenant at the earliest opportunity, and no later than when the seller or prospective landlord makes available information in writing to the prospective buyer or tenant where requested, or where the prospective buyer or tenant views the building (whichever is earlier).

In addition, the Regulations require that the seller or prospective landlord ensures that a valid EPC has been given free of charge to the ultimate buyer or tenant.

The Regulations also require that the seller or prospective landlord must secure that an EPC is commissioned for a building, where that building is to be sold or rented out and no valid EPC is available for that building.

Where a building or building unit offered for sale or rent has a valid EPC, the asset rating of the building expressed in the EPC must be stated in any advertisement of the sale or rental in commercial media.

Under Regulation 35, the Council has the power to require the production of documents, including the EPC, within 6 months after the last day on which the person concerned was subject to a duty in relation to the building. Documents must be provided within seven days.

A penalty charge may be issued for failure to comply with requirements under the Regulations. When considering taking enforcement action, the Council will apply the following:

- a) Where the building is a dwelling, the penalty charge specified in the notice shall be £200 in relation to a relevant breach of a duty.
- b) Where the building is not a dwelling, the penalty charge specified in the notice shall, in most cases, be 12.5% of the rateable value of the property, with a minimum penalty of £500 and a maximum penalty of £5,000.

The other penalty amounts under the Regulations are as follows;

- in relation to a breach of a duty under regulation 14(3)(a), £1,000
- in relation to a breach of a duty under regulation 10(2) or 14(3)(b), £500;
- in relation to a breach of a duty under regulation 18(1), 20(1), 20(2) or 21, £300; and
- in relation to a breach of a duty under regulation 11(2) or 35(5), £200.

If a penalty charge notice is issued, the recipient of the notice may request a review of the Council's decision to issue the notice. If the recipient of the notice is not satisfied with the outcome of the review, they may within 28 days (beginning with the day after that on which the notice under regulation 39(1)(c) is given), appeal to the county court (Regulation 40).

Every person with an interest in, or in occupation of, the building must co-operate in relation to enabling the responsible person to comply with the Regulations.

A person who obstructs an officer of an enforcement authority acting in pursuance of regulation 35, or a person who purports to act as such an officer, is guilty of an offence.

A person guilty of an offence is liable on summary conviction to a fine not exceeding level 5 on the standard scale.

Appendix 12 - The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015

The Minimum Energy Efficiency Standards (MEES) came into force in April 2018 and have been amended twice since that time. This policy document reflects the most recent up to date amendments made on the 15 March 2019.

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, as amended are referred to in this document as “the Regulations”. The Regulations are designed to tackle the least energy-efficient properties in England and Wales – those rated F or G on their Energy Performance Certificate (EPC). The Regulations establish a minimum standard of EPC band E for both domestic and non-domestic private rented property, affecting new tenancies and renewals since 1 April 2018.

The Regulations introduced a new self-funding element for domestic landlords, which takes effect if landlords are unable to access third-party funding to improve any EPC F or G properties, they let to EPC E. The Regulations set out the minimum level of energy efficiency for private rented property in England and Wales. In relation to the domestic private rented sector (PRS) the minimum level is EPC E.

Landlords who are installing relevant energy efficiency improvements may, of course, aim above and beyond this current requirement if they wish. The minimum standard will apply to any domestic private rented property which is legally required to have an EPC, and which is let on certain tenancy types. Where these two conditions are met the landlord must ensure that the standard is met (or exceeded).

Landlords of domestic property for which an EPC is not a legal requirement are not bound by the prohibition on letting sub-standard property.

The minimum level of energy efficiency means that, subject to certain requirements and exemptions:

- since 1 April 2018, landlords of relevant domestic private rented properties must not grant a tenancy to new or existing tenants if their property has an EPC rating of F or G (as shown on a valid EPC for the property); and
- from 1 April 2020, landlords must not continue letting a relevant domestic property which is already let if that property has an EPC rating F or G (as shown on a valid EPC for the property).

Where a property is sub-standard, landlords must normally make energy efficiency improvements which raise the EPC rate to minimum E before they let the property.

In certain circumstances, landlords may be able to claim an exemption from this prohibition on letting sub-standard property. Where a valid exemption applies, landlords must register the exemption on the PRS Exemptions Register.

The Regulations cross-refer to other Regulations, including the Energy Performance of Buildings (Certificates and Inspections) (England and Wales) Regulations 2007, the Building Regulations 2010 and the Energy Performance of Buildings (England and Wales) Regulations 2012.

How the Council enforces the Regulations

It should never be more cost effective to offend or breach the regulations and therefore penalty levels will be set at such a level as to deter reoffending. The level of fine will be determined via application of the enforcement matrix.

The Council is responsible for enforcing compliance with the domestic minimum level of energy efficiency. It may check whether a property meets the minimum level of energy efficiency and may issue a compliance notice requesting information where it appears to them that a property has been let in breach of the Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015 or an invalid exemption has been registered in respect of it).

Where the Council is satisfied that a property has been let in breach of the Regulations it may serve a notice on the landlord imposing financial penalties.

The authority may also publish details of the breach on the [PRS Exemptions Register](#).

The landlord may ask the Council to review the penalty notice and, if the penalty is upheld on review, the landlord may then appeal the penalty notice to the First-tier Tribunal.

The Council may also serve a penalty notice for the lodging of false information on the PRS Exemptions Register.

The Council may check for different forms of non-compliance with the Regulations including:

- since 1 April 2018 whether the property is sub-standard and let in breach of regulation 23 (which may include continuing to let the property after 1 April 2020); and
- where the landlord has registered any false or misleading information on the PRS Exemptions Register or has failed to comply with a compliance notice.

Compliance notices

Since 1 April 2018, where the Council believes that a landlord may be in breach of the prohibition on letting a sub-standard property, or a landlord has been in breach of the prohibition at any time in the past 12 months, the Council may serve a compliance notice that requests information from that landlord which will help them to decide whether that landlord has in fact breached the prohibition.

The fact that the Council may serve a compliance notice on a landlord up to 12 months after the suspected breach means that a person may be served with a compliance notice after they have ceased to be the landlord of the property.

It is good practice, therefore, for landlords to retain any records and documents relating to a let property that may be used to demonstrate compliance with the Regulations.

Any notice that is served under the Regulations must be in writing and may be sent in hard copy or electronically. Where a notice is served on a corporate body it may be given to the secretary or clerk of that body if a suitably named individual cannot be identified. Where a notice is served on a partnership, it may be addressed to any partner, or to a person who has control or management of the partnership business.

A compliance notice served by the Council may request either the original or copies of the following information:

- the EPC that was valid for the time when the property was let;
- any other EPC for the property in the landlord's possession;
- the current tenancy agreement used for letting the property;
- any Green Deal Advice Report in relation to the property; and
- any other relevant document that the Council requires in order to carry out its compliance and enforcement functions.

The compliance notice may also require the landlord to register copies of the requested information on the [PRS Exemptions Register](#).

The compliance notice will specify:

- the name and address of the person that a landlord must send the requested information to; and
- the date by which the requested information must be supplied (the notice must give the landlord at least one calendar month to comply).

The landlord must comply with the compliance notice by sending the requested information to the Council and allow copies of any original documents to be taken.

Failure to provide documents or information requested by a compliance notice, or failure to register information on the PRS Exemptions Register as required by a compliance notice, may result in a penalty notice being served.

The Council may withdraw or amend the compliance notice at any time in writing, for example where new information comes to light.

The Council may also use the documents provided by the landlord or any other information it holds.

Publication penalty

The regulations also include a publication penalty; this means that the Council will publish some details of the landlord's breach on a publicly accessible part of the PRS Exemptions Register.

The Council can decide how long to leave the information on the Register, but it will be available for view by the public for at least 12 months.

The information that the Council may publish is:

- the landlord's name (except where the landlord is an individual);
- details of the breach; and
- the address of the property in relation to which the breach occurred; and the amount of any financial penalty imposed.

The Council may decide how much of this information to publish. However, the authority may not place this information on the PRS Exemptions Register while the penalty notice could be, or is being reviewed by the Council, or while their decision to uphold the penalty notice could be, or is being, appealed.

Decision to issue a financial penalty

Where the Council decides to impose a financial penalty, they have the discretion to decide on the amount of the penalty, up to maximum limits set by the Regulations as shown in Table 13.

Table 13 - Maximum limits for MEEs

Infringement	Penalty (less than three months in breach)	Penalty (three months or more in breach)
Renting out a non-compliant property	Up to £2000 and/or publication penalty	Up to £4000 and/or publication penalty
Providing false or misleading information on the PRS exemptions register	Up to £1000 and/or publication penalty	Up to £1000 and/or publication penalty
Failing to comply with a compliance notice	Up to £2000 and/or publication penalty	Up to £2000 and/or publication penalty

The Council may not impose a financial penalty under both paragraphs (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial

penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the **total amount** of the financial penalty may **not be more than £5,000**.

It is important to note that this maximum amount of £5,000 applies per property, and per breach of the Regulation. Given this, it means that, if after having been previously fined up to £5,000 for having failed to satisfy the requirements of the Regulations, a landlord proceeds to unlawfully let a sub-standard property on a new tenancy; the Council may again levy financial penalties up to £5,000 in relation to that new tenancy.

From 1 April 2018 onwards, the Council may serve a penalty notice (relating to a financial penalty, a publication penalty or both) on the landlord where they are satisfied that the landlord is, or has been in the last 18 months:

- in breach of the prohibition on letting sub-standard property (which may include continuing to let the property after 1 April 2020).
- in breach of the requirement to comply with a compliance notice; or
- has uploaded false or misleading information to the Exemptions Register.

The fact that the Council may serve a penalty notice on a landlord up to 18 months after the suspected breach means that a person may be served with a penalty notice after they have ceased to be the landlord of a property.

The penalty notice may include a financial penalty, a publication penalty or both. The penalty notice will:

- explain which of the provisions of the Regulations the Council believes the landlord has breached.
- give details of the breach.
- tell the landlord whether they must take any action to remedy the breach and, if so, the date within which this action must be taken (the date must be at least a month after the penalty notice is issued).
- explain whether a financial penalty is imposed and if so, how much and, where applicable, how it has been calculated.
- explain whether a publication penalty has been imposed.
- where a financial penalty is imposed, tell the landlord the date by which payment must be made, the name and address of the person to whom it must be paid and the method of payment (the date must be at least a month after the penalty notice is issued).
- explain the review and appeals processes, including the name and address of the person to whom a review request must be sent, and the date by which the request must be sent, and

- explain that if the landlord does not pay any financial penalty within the specified period, the Council may bring court proceedings to recover the money from the landlord.

A further penalty notice may be issued if the action required in the penalty notice is not taken in the time specified.

As noted above, when the Council issues a penalty notice which carries a right of appeal, they must tell the landlord about that right of appeal.

Withdrawing or reviewing a penalty notice after representations

The Council may decide to review its decision to serve a penalty notice, for example when new information comes to light.

A landlord also has the right to ask the Council to review its decision to serve a penalty notice. This request must be made in writing.

The penalty notice must tell the landlord how long they have to make this request, and who it must be sent to.

When the Council receives the request, it must consider everything the landlord has said in the request and decide whether or not to withdraw the penalty notice.

The Council must withdraw the penalty notice if:

- it is satisfied that the landlord has not committed the breach set out in the penalty notice.
- although it still believes the landlord committed the breach, it is satisfied that the landlord took all reasonable steps, and exercised all due diligence to avoid committing the breach, or
- it decides that because of the circumstances of the landlord's case, it was not appropriate for the penalty notice to be served.

If the Council does not decide to withdraw the penalty notice, it might decide to waive or reduce the penalty, allow the landlord additional time to pay, or modify the publication penalty, and must explain the appeals process and how financial penalties can be recovered.

In the event of two or more persons receiving separate Notices of Intent for the same matter, it should be noted that acceptance/payment of a civil penalty by one person will not negate the Council's intention to impose a civil penalty on the second or further persons. Each person served with the Notice of Intent is considered individually liable

to pay the civil penalty notified to them. It is therefore important that any recipient of a Notice of Intent takes the opportunity to make representations should they consider for any reason a civil penalty should not be individually imposed upon them. This approach is taken to ensure consistency in the way we enforce the legislation.

Whatever it decides, the Council must inform the landlord of their decision in writing and should do so at the earliest opportunity.

Appeals

Where a landlord asks the Council to review a decision to serve a penalty notice and, on review, they decide to uphold the penalty notice, the landlord may then appeal to the First-tier Tribunal against that decision if they think that:

- the penalty notice was based on an error of fact or an error of law.
- the penalty notice does not comply with a requirement imposed by the Regulations, or
- it was inappropriate to serve a penalty notice on them in the particular circumstances.

If a landlord does appeal, the penalty notice will not take effect while the appeal is ongoing. A landlord may also wish to seek legal advice as part of considering or making an appeal if they have not already done so.

Appendix 13 - The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 came into force on the 1st June 2020 and were amended by the Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025.

These regulations require all landlords to have the electrical installations in their properties inspected and tested by a qualified person at least every 5 years. They must obtain a report from the qualified person and provide a copy of this to their tenants, and to the local council if requested.

The regulations came into force for the social rented sector on the 1st November 2025 and apply to social housing tenancies granted after the 1st December 2025.

For social housing tenancies granted before the 1st December 2025, the regulations come into force on the 1st May 2026. There is transitional provision set out in the regulations for such tenancies, which requires social landlords in the first instance to:

- Ensure electrical installations are inspected and tested by a qualified person before 1 November 2026.
- Ensure electrical equipment is checked by a qualified person before 1 November 2026.

Social landlords must also have the electrical equipment that they provide under the tenancy checked by a qualified person at least every 5 years. They must provide a copy of the record to their tenants, and to the local council if requested.

Where the record indicates that electrical equipment is not safe for continued use, the landlord must, as soon as reasonably practicable and no later than 28 days after the check, ensure that remedial work is carried out or replace the equipment.

Subsequent inspections and tests of electrical installations and checks of electrical equipment must be undertaken at least every 5 years.

Excluded tenancies are:

- shared accommodation with the landlord or the landlord's family.
- long leases (including shared ownership leases) or tenancies that grant a right of occupation of 7 years or more.
- student halls of residence.
- hostels and refuges.
- care homes, hospitals and hospices.
- other accommodation relating to healthcare provisions.
- mobile homes, caravans and boats.

All landlords must:

- Ensure national standards for electrical safety are met. These are set out in the appropriate 'wiring regulations', which are published as British Standard 7671.
- Ensure all electrical installations in their rented properties are inspected and tested by a qualified and competent person at least every five years.
- Obtain a report from the person conducting the inspection and test which gives the results and sets a date for the next inspection and test.
- Supply a copy of this report to the existing tenant within 28 days of the inspection and test.
- Supply a copy of this report to a new tenant before they occupy the premises.
- Supply a copy of this report to any prospective tenant within 28 days of receiving a request for the report.
- Supply the Council with a copy of this report within seven days of receiving a written request for a copy.

- Retain a copy of the report to give to the inspector and tester who will undertake the next inspection and test.
- Where the report shows that further investigative or remedial work is necessary, complete this work within 28 days or any shorter period if specified as necessary in the report.
- Supply written confirmation of the completion of the further investigative or remedial works from the electrician to the tenant and the Council within 28 days of completion of the works.

Landlords must obtain a report giving the results of the test and setting a date for the next inspection. Landlords must comply within 7 days with a written request from Coventry City Council for a copy of the report and must also supply the Council with confirmation of any remedial or further investigative works required by a report.

Coventry City Council may wish to request reports following inspections of properties to ascertain the condition of the electrical installation and confirm the landlord is complying with the Regulations.

Inspectors will use the following classification codes to indicate where a landlord must undertake remedial work. More information can be found in the relevant edition of the Wiring Regulations.

- **Code 1 (C1): Danger present. Risk of injury. The electrical inspector may make any C1 hazards safe before leaving the premises.**
- **Code 2 (C2): Potentially dangerous.**
- **Code 3 (C3): Improvement recommended. Further remedial work is not required for the report to be deemed satisfactory.**
- **Further Investigation (FI): Further investigation required without delay.**

If the report contains a code C1, C2 or FI, then the landlord must ensure that further investigative or remedial work is carried out by a qualified person within 28 days, or less if specified in the report.

The C3 classification code does not indicate remedial work is required, only that improvement is recommended.

A remedial notice must be served where the Council is satisfied on the balance of probabilities that a landlord has not complied with one or more of their duties under the Regulations. The notice must be served within 21 days of the decision that the landlord has not complied with their duties.

If the Council has reasonable grounds to believe a landlord is in breach of one or more of the duties in the Regulations and the report indicates urgent remedial action is required, it may, with the consent of the tenant or tenants, arrange for a qualified person to take the urgent remedial action and recover their costs.

Otherwise, they must serve a remedial notice requiring the landlord to take remedial action within 28 days. Should a landlord not comply with the notice the Council may, with the tenant's consent, arrange for any remedial action to be taken themselves.

Landlords have the right to make written representation and appeal against remedial action. The Council can recover the costs of taking the action from the landlord.

Under Regulation 11 of the Regulations where the Council is satisfied, beyond a reasonable doubt, that a landlord has breached a duty under regulation 3, the authority may impose a financial penalty (or more than one penalty in the event of a continuing failure) in respect of the breach.

Regulation 3 states that a landlord who grants or intends to grant a specified tenancy must

- a) ensure that the electrical safety standards are met during any period when the residential premises are occupied under a specified tenancy.
- b) ensure every electrical installation in the residential premises is inspected and tested at regular intervals by a qualified person, and
- c) ensure the first inspection and testing is carried out
 - o before the tenancy commences in relation to a new specified tenancy;
 - or
 - o by 1 April 2021 in relation to an existing specified tenancy.

"Regular intervals" means:

- at intervals of no more than five years, or
- where the most recent report requires such inspection and testing to be at intervals of less than five years, at the intervals specified in that report.

Following the inspection and testing required a landlord must:

- a) obtain a report from the person conducting that inspection and test, which gives the results of the inspection and test and the date of the next inspection and test.
- b) supply a copy of that report to each existing tenant of the residential premises within 28 days of the inspection and test.
- c) supply a copy of that report to the Council within seven days of receiving a request in writing for it from that authority.
- d) retain a copy of that report until the next inspection and test is due and supply a copy to the person carrying out the next inspection and test, and
- e) supply a copy of the most recent report to
 - i. any new tenant of the specified tenancy to which the report relates before that tenant occupies those premises, and
 - ii. any prospective tenant within 28 days of receiving a request in writing for it from that prospective tenant.

Where a report indicates that a landlord is or is potentially in breach of the duty and the report requires the landlord to undertake further investigative or remedial work, the landlord must ensure that further investigative or remedial work is carried out by a qualified person within:

- a) 28 days, or
- b) the period specified in the report if less than 28 days, starting with the date of the inspection and testing.

Where the above applies, a landlord must:

- a) obtain written confirmation from a qualified person that the further investigative or remedial work has been carried out and that:
 - i. the electrical safety standards are met, or
 - ii. further investigative or remedial work is required.
- b) supply that written confirmation, together with a copy of the report which required the further investigative or remedial work to each existing tenant of the residential premises within 28 days of completion of the further investigative or remedial work; and
- c) supply that written confirmation, together with a copy of the report which required the further investigative or remedial work to the Council within 28 days of completion of the further investigative or remedial work.

Where further investigative work is carried out and the outcome of that further investigative work is that further investigative or remedial work is required, the private landlord must repeat the steps above in respect of that further investigative or remedial work.

Determining Penalty Levels

The Council may impose a financial penalty of up to £40,000 on landlords who are in breach of specified duties under the regulations. In determining the civil penalty amount, the Council will have regard to the guidance provided by Government - [Civil penalties under the Renters' Rights Act 2025 and other housing legislation](#) as described earlier.

Table 14 below sets out the interrelation between harm and culpability as an initial determinant of the Civil Penalty banding.

Table 14 - Electrical Regs Penalty Bands

Band Severity		Band Width (£)
1	Low Culpability/Low Harm	£0 to £4,999
2	Medium Culpability/Low Harm	£5,000 to £9,999
3	Low Culpability/ Medium Harm or High Culpability/ Low Harm	£10,000 to £14,999

Band Severity		Band Width (£)
4	Low Culpability/High Harm or Medium Culpability/ Medium Harm	£15,000 to £19,999
5	Medium Culpability/High Harm or High Culpability/Medium Harm	£20,000 to £29,999
6	High Culpability/High Harm	£30,000 to £40,000

Process

The procedure for imposing a civil penalty is set out in Schedule 2 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 and summarised below.

The Council must give the person a notice of its proposal ('notice of intent') to impose a civil penalty. The notice of intent must set out:

- the amount of the proposed financial penalty.
- the reasons for proposing to impose the penalty, and,
- information about the right of the landlord to make representations.

The notice of intent must be served before the end of the period of 6 months beginning with the first day on which the authority is satisfied, in accordance with regulation 11, that the private landlord is in breach ("the relevant day"), subject to sub-paragraph (3).

(3) If the breach continues beyond the end of the relevant day, the notice of intent may be served

(a) at any time when the breach is continuing or

(b) within the period of 6 months beginning with the last day on which the breach occurs.

The private landlord may, within the period of 28 days beginning with the day after that on which the notice of intent was served, make written representations to the Council about the proposal to impose a financial penalty on the private landlord.

After the end of the period for representations, the Council must decide whether to impose a penalty and, if so, the amount of the penalty. If the authority decides to impose a financial penalty, it must give the person a notice ('final notice') requiring that the penalty is paid within 28 days.

The final notice must set out:

- the amount of the financial penalty.
- the reasons for imposing the penalty.

- information about how to pay the penalty.
- the period for payment of the penalty (28 days).
- information about rights of appeal, and,
- the consequences of failure to comply with the notice.

The Council may at any time:

- withdraw a notice of intent or final notice or
- reduce the amount specified in a notice of intent or final notice.

On receipt of a final notice imposing a financial penalty a landlord can appeal to the First Tier Tribunal against the decision to impose a penalty and/or the amount of the penalty. The appeal must be made within 28 days of the date the final notice was issued. The final notice is suspended until the appeal is determined or withdrawn.

If the private landlord does not pay the whole or any part of a financial penalty which, the private landlord is liable to pay the Council may recover the penalty or part on the order of the county court as if it were payable under an order of that court.

Appendix 14 - Tenant Fees Act 2019 and Section 83 The Consumer Rights Act

The Tenant Fees Act 2019 should be considered alongside other legislation that gives the Council the power to protect tenants and tackle poor practice by landlords and letting agents, which includes:

- [Renters' Rights Act 2025](#).
- [Housing Act 2004](#).
- [Client Money Protection Schemes for Property Agents Regulations 2018 S.I. 2018/751](#).
- [Client Money Protection Schemes for Property Agents Regulations 2019](#).
- [Enterprise and Regulatory Reform Act 2013](#).
- [Consumer Rights Act 2015](#).
- [Housing and Planning Act 2016](#).

The act amends:

- Consumer Rights Act 2015, [section 83](#) and [87](#).
- [Enterprise and Regulatory Reform Act 2013 section 85](#).
- [Redress Schemes for Letting Agency Work and Property Management work order 2014 article 7](#).
- [Housing and Planning Act 2016 Order 2014 and changes to section 135](#).

In the Act, “enforcement authority” means either a local weights and measures authority in England, or a district council that is not a local weights and measures authority and it is the duty of every local weight and measure authority in England to enforce in its area:

- Section 1 (prohibitions applying to landlords),
- Section 2 (prohibitions applying to letting agents), and
- Schedule 2 (treatment of holding deposits).

Coventry City Council is a weights and measures authority for the purposes of the Act.

As of the 1st June 2020, the ban on fees will apply to all applicable tenancies and licences to occupy housing in the private rented sector, regardless of when they were entered into. Landlords are responsible for the costs associated with setting up, renewing or ending a tenancy (i.e. referencing, administration, inventory, renewal and check-out fees). Landlords will not be able to charge any fees after this date (apart from those fees which are expressly permitted under the ban).

The Renter Rights Act 2025 ends fixed term tenancies from the 1st May 2026 after which time all tenancies will become periodic. This will ensure that any charges such as renewal fees hidden within fixed term re-lets are brought to an end.

Definition of a relevant person

For the purposes of the Act and this policy a “relevant person” is a tenant or a person acting on behalf of a tenant, or who has guaranteed the payment of rent by a tenant but does not include:

- c) A local housing authority within the meaning of the Housing Act 1985 (see section 1 of that Act),
- d) The Greater London Authority, or
- e) A person acting on behalf of an authority within paragraph (a) or the Greater London Authority.

The Act applies to periodic assured tenancies, student accommodation and licenses to occupy housing, in England only. The Act covers licences to occupy housing, to ensure that lodgers or tenants of houses in multiple occupation (“HMOs”) also cannot be charged fees. A licence to occupy housing is a personal permission for someone to occupy housing. It does not give the licensee a legal interest in or control of the housing and includes those licenses issued by resident landlords but does not include a license to occupy housing for a holiday (short term holiday lets).

In addition, the Act applies to housing associations and local authorities, where they are letting a relevant tenancy such as an assured periodic tenancy. The Act does not apply to long leases, as defined in Chapter 1 of Part 1 of the Leasehold Reform,

Housing and Urban Development Act 1993. Nor does it apply to shared ownership leases as defined by section 7(7) of the Leasehold Reform, Housing and Urban Development Act 1993, where the tenant's total share (within the meaning given by that section) is 100%.

Excluded licenses

An excluded license is intended to help charities and Community Interest Companies (this is usually a registered Homeshare organisation) arrange home sharing in private properties for a social benefit. For example, the prevention of loneliness of the elderly.

A national charity, Shared Lives Plus, has a register for members who rent out Homeshares.

The licensee under Homeshares can be set up to provide the licensor with companionship. The person who had been granted the license may also offer care for the licensor and help with tasks that are not related to finances.

In some cases, the licensee does not pay rent. In those circumstances, the licensor may get payments towards council tax, utility bills, internet and phone services or a TV licence.

From 1 June 2019 landlords or agents will no longer be able to require tenants in the private rented sector in England, or any persons acting on behalf of a tenant or guaranteeing the rent, to make certain payments in connection with a tenancy.

Definition of Letting Agency Work

Means things done by a person in the course of a business in response to instructions received from:

- a) A landlord who is seeking to find another person to whom to let housing,
or
- b) A tenant who is seeking to find housing to rent.

A person is not a letting agent for the purposes of the Act if the person engages in letting agency work in the course of that person's employment under a contract of employment.

A person who is an authorised person in relation to a reserved legal activity is not a letting agent when carrying out legal activity in response to instructions from a landlord or tenant who does not also instruct that person to do other things as listed under a) and b) above.

Definition of a Landlord

A landlord is defined as;

- a) A person who proposes to be a landlord under a tenancy,

- b) A person who has ceased to be a landlord under a tenancy,
- c) A licensor under a licence to occupy housing,
- d) A person who proposes to be a licensor under a licence to occupy housing, and,
- e) A person who has ceased to be a licensor under a licence to occupy housing.

Permitted payments

The permitted payments are:

The Rent and Rent in advance (once a tenancy has been signed)

The rent should be paid at regular and specified intervals. The amount charged should usually be equally split across the tenancy and not charged before the tenancy agreement has been signed. In the first year of the tenancy, a landlord or agent must not charge the tenant more at the start of the tenancy as opposed to a later period. For example, if a landlord or agent requires a tenant to pay £800 in month one and £500 in month two onwards, the surplus of £300 in month one will be a prohibited payment.

Sections 8 and 9 of the Renters' Rights Act 2025 makes a new provision for rent in advance and applies to assured periodic tenancies in the private rented sector starting on 1 May 2026.

The rules will not apply to:

- tenancy agreements that were signed before 1 May 2026.
- payments of rent in advance that were made before 1 May 2026.

Rent in advance is when a landlord or letting agent asks a tenant to pay rent before it is due. This includes paying rent before the tenancy starts or before it is due as agreed in the tenancy agreement.

Under the Renters' Rights Act 2025, a landlord cannot ask for, encourage or accept rent before a tenancy agreement has been signed by them or their letting agent and the tenant.

If a tenant pays their rent monthly, then a landlord can ask them to pay their first month's rent at any time between signing the tenancy agreement and the tenancy starting. This is also known as the pre-tenancy period. If the tenant is paying rent more frequently than monthly, for example, weekly, the landlord can ask the tenant to pay up to the first 28 days' rent during the pre-tenancy period.

Once the pre-tenancy period has ended and the tenancy has started, rent payments will be payable on the rent due date agreed in the tenancy agreement. A landlord will

not be able to require the tenant to make their rent payment before that date, regardless of what the tenancy agreement says. However, the tenant may choose to pay their rent early to help them budget. Once the tenancy has started the tenant can choose to pay any amount of rent early.

Landlords may only increase the rent once per year, with a statutory process. This removes the possibility of imposing disguised fees through unfair contractual rent “adjustments.” This statutory process is defined in Section 6 of the Renters Rights Act 2025

Taking rent in advance prior to a tenancy agreement being signed will be deemed a prohibited payment and therefore could be subject to enforcement action in line with the Council’s general approach to enforcement.

A refundable tenancy deposit capped at no more than five weeks’ rent.

where the annual rental income is below £50,000 and six weeks’ rent for properties with an annual rental income of £50,000 or more; This is a refundable payment that a landlord or agent may ask a tenant to pay to be held as security for the performance of any obligations of the tenant or discharge of any liability arising under or in connection with the tenancy. A landlord or agent is not legally required to take a deposit.

A landlord or agent must not ask for a deposit which is more than five weeks’ rent for properties where the annual rental income is below £50,000. It is expected this will apply to the majority of tenancies. For tenancies with an annual rental income of £50,000 or higher, a landlord or agent must not ask for a deposit which is more than six weeks rent. Properties with an annual income of £100,000 are not covered by the Act as they are not capable of being assured shorthold tenancies.

For example, where there are three tenants who are jointly liable for a total weekly rent of £240, the landlord or agent cannot ask each tenant to pay a tenancy deposit of up to five times the total weekly rent ($5 \times 240 = £1200$). The maximum this group of tenants could be asked to pay as a tenancy deposit between them would be £1200. They may then choose to split this equally so that each person would pay £400. Any deposit that a landlord or agent requests for an assured shorthold tenancy must be protected in one of the three Government backed tenancy deposit schemes within 30 days of them taking the payment. This is the tenant’s money, and a landlord or agent will need to provide evidence to substantiate the reasons for any deductions from the deposit at the end of the tenancy.

A refundable holding deposit (to reserve a property) capped at no more than one week’s rent.

A landlord or agent can ask a tenant to pay a holding deposit to demonstrate their commitment to rent the property whilst they undertake relevant reference checks. They

cannot ask for a holding deposit which is more than one week's rent. If they do, any amount above one week's rent will be a prohibited payment (this cap is based on the total agreed rent for the property).

For example, if there are three tenants who are jointly liable for the agreed total weekly rent of £240, the landlord or agent cannot charge each tenant a £240 holding deposit. The maximum this group of tenants could be asked to pay as a holding deposit between them would be £240. They may then choose to split this equally so that each person would pay £80. A landlord or agent must refund the holding deposit if the tenant signs a tenancy agreement with them or if they decide to pull out of the arrangement with the tenant or fail to enter a tenancy agreement before the agreed deadline.

A landlord or agent can retain the holding deposit if the tenant fails a Right to Rent check, withdraws from the application process or if the landlord and agent take all reasonable steps to enter the tenancy but the tenant does not. N.B. The deadline for agreement is the date by which agents/landlords and tenants should enter into a tenancy agreement after payment of the holding deposit. The default deadline for agreement is 15 days following the receipt of the holding deposit, but the landlord or agent may agree in writing a longer deadline with the tenant.

A landlord or agent is also entitled to retain a holding deposit if the information provided is false or misleading information. However, they can only take this information into account where the difference between the information provided and the correct information, or the conduct of the tenant in providing it, reasonably affects the landlord's decision to grant the tenancy. This is likely to be the case only where the mistake casts doubt on the tenant's financial suitability or honesty, for example:

- the income declaration was significantly too high because of a typo – even if the typo was an unknown error.
- a clear lie about income or employment – even if the landlord would have been satisfied with the correct information.
- failure to disclose (provided that the tenant has been directly asked) any relevant information which later comes to the landlord or agent's attention, such as a valid County Court Judgment.

A landlord or agent cannot retain a holding deposit if the false or misleading information provided, or conduct in providing it, is not relevant to the individual's suitability as a tenant, for example:

- where a tenant has misspelled their name, the name of their employer or a previous address.
- the tenant omitted to declare a previous address – and the omission had no bearing on their credit worthiness or other assessment of suitability.
- the tenant slightly misjudged their income but not in any way that affects their ability to afford the rent.

Where a landlord or agent retains the holding deposit, they must provide reasons in writing to the tenant within 7 days of the decision by the landlord not to enter into a tenancy agreement or the expiry of the deadline for agreement. If they fail to do so the landlord or agent must refund the holding deposit.

Landlords and agents are entitled to retain the full holding deposit if any of the grounds for retention are met although the accompanying guidance for landlords and agents encourages them to only retain money to cover any costs incurred.

A landlord or agent must not receive subsequent holding deposits for the same property, where the first holding deposit has not been repaid unless the earlier deposit was lawfully retained under schedule 2. This is intended to prevent landlords or agents taking multiple holding deposits from different prospective tenants for a property at the same time. If a landlord or agent fails to return the holding deposit within 7 days of the parties entering into a tenancy agreement, the date of the decision by the landlord or agent not to enter into a tenancy agreement, the parties fail to enter into agreement before the deadline for agreement, fail to provide in writing why a holding deposit has been retained or they retain a holding deposit in a situation where the landlord or agent imposes a requirement which breaches the ban or act in a manner towards the tenant or relevant person in such a way as it would be unreasonable to expect the tenant to enter the tenancy, they will be liable for a financial penalty of up to £5,000.

Payments in the event of a default of the tenant;

A landlord or agent may only charge a default fee under a term of the tenancy agreement in respect of replacing a lost key or other security device to give access to the housing or late payment of rent. Any charge for a lost key or security device giving access to the housing must not exceed the landlord or agent's reasonable costs incurred and must be evidenced in writing to the person who is liable for the payment.

A landlord or agent may in the event of late payment of rent, charge for payment that has been outstanding for 14 days or more and with interest at no more than an annual percentage rate of 3% above the Bank of England's base rate for each day that the payment is outstanding. The Act does not affect the landlord's entitlement to recover damages for breach of the tenancy agreement by way of a deduction from the tenancy deposit or through the courts or an agent's entitlement to recover damages through the courts for breach of an agreement between them and a relevant person.

A default fee is a payment required under an express term in the tenancy agreement that provides that a tenant is required to make a payment in the event of a lost key or other security device giving access to the housing or a late rent payment. Damages on the other hand are the general remedy available for breach of contract and will encompass other contract breaches under or in connection with the tenancy, which are not expressly covered by a default provision.

Example of default fee provisions:

- The tenant is responsible for ensuring that they look after the key/s for the property throughout the tenancy. If they fail to do so, they will be responsible for covering the reasonable costs of replacement of the key/s;
- The tenant is responsible for paying their rent on time. If they fail to do so, interest will be charged in line with the Bank of England's base rate if a rent payment is more than 14 days overdue for each day the payment is outstanding.

Payments on assignment, novation or variation of a tenancy

when requested by the tenant capped at £50, or reasonable costs incurred if higher; If the tenant requests a change to their tenancy agreement, for example, a change of sharer, a landlord or agent is entitled to charge up to £50 for the administration involved in amending the tenancy agreement or the amount of their reasonable costs, if that is higher. Any charge above that amount is a prohibited payment.

The general expectation is that this charge should not exceed £50. In any case, a landlord or agent should be able to demonstrate to the tenant that any fee charged above £50 is reasonable and provide evidence of their costs. Evidence could be provided through invoices or receipts. Assignment is the process whereby a person, the assignor, transfers rights, obligations or benefits to another, the assignee, for example, where a new tenant takes the place of another in a flat share arrangement. Novation is different from assignment; it involves the creation of a new contract and requiring consent of all parties. Variation is the act of changing or adapting a contract. It is worth noting that the £50 threshold is not a fixed fee rather a cap or upper limit to what can be charged and reasonable costs should be evidenced and may often fall below this £50 threshold. Therefore, charging a flat fee of £50 could be prohibited. The fee would need to be calculated on a case-by-case basis.

Payments associated with early termination of the tenancy;

When requested by the tenant; If a tenant requests to leave before the end of their tenancy a landlord or agent is entitled to charge an early termination fee, which must not exceed the loss they have suffered in permitting the tenant to leave early.

This would usually mean that they must not charge any more than the rent they would have received before the tenancy reaches its end. A landlord or agent should aim to agree to any reasonable request to terminate the tenancy agreement early and should charge no more than to cover any likely void period. A tenant could still be required to pay rent at specified intervals as determined by their tenancy agreement until a replacement tenant is found.

Payments in respect of utilities, communication services and council tax;

Tenants remain responsible for paying their bills, which could include council tax, utility payments (e.g. gas, electricity, water), and communication services (e.g. broadband, television license, phone). Where all or some of these payments are included within the rent, as set out under the terms of a tenancy agreement, a tenant cannot be required to pay for these services separately (but would still be required to pay any bills not included in the rent).

Chapter 3 of Part 3 of the Consumer Rights Act 2015

Chapter 3 of Part 3 of the Consumer Rights Act 2015 requires an agent in England to display information about their relevant fees and membership of redress and client money protection schemes prominently in their office and on their website.

The amendments are:

1. to apply those requirements in relation to third party websites (any portal on which a property to let is advertised, for example, Rightmove, Zoopla or Facebook).
2. to make new provision to allow a local weights and measures authority in England to impose more than one financial penalty in respect of a continuing breach of the requirement to publicise fees in England; and, 3. to require letting agents to give the name of their Client Money Protection scheme (not just whether they are a member of such a scheme, as this will become a mandatory requirement from April 2019).
3. to require letting agents to give the name of their client money protection scheme (not just whether they are a member of such a scheme).

In the legislation “in connection with a tenancy” is defined as requirements:

- in consideration of, or in consideration of arranging for, the grant, renewal, continuance, variation, assignment, novation or termination of a tenancy.
- on entry into a tenancy agreement containing relevant provisions.
- pursuant to a provision of a tenancy agreement, or pursuant to an agreement relating to such a tenancy with a letting agent, which requires or purports to require the person to do any of those things in the event of an act or default of the person or if the tenancy is varied, assigned, novated or terminated, and
- as a result of an act or default related to the tenancy unless pursuant to, or for breach of, a tenancy agreement or other agreement, and
- in consideration of providing a reference for a former tenant. In essence this covers any fee or charge related to a tenancy except for those expressly permitted in Schedule 1 of the Act. Any such payment will be a prohibited payment under the Act.

A landlord or agent must not require a tenant to make payments or enter a contract for the provision of a service or a contract of insurance with a third party or require a tenant to make a loan. An agent who provides a service to a tenant, and as part of that service finds a house to rent, which the tenant then rents, is not caught by the ban provided that the agent does not also work for the landlord of the house the tenant is seeking to rent. This is the case even if the agent does not act for the landlord for the specific property in question but works for the landlord more broadly.

The agent is not permitted to charge fees if they do work for the landlord. For example, a relocation agent that finds a property to rent on behalf of a tenant but does not also work for the landlord of that property (or for any other property) can charge the tenant, by whom they have been contracted, fees. The approach to implementing this policy has been to ban all fees except those expressly permitted in Schedule 1 of the Act. The permitted payments are a) the rent.

Enforcement

Where the Council is satisfied beyond reasonable doubt that a landlord or property agent has breached the requirements of Sections 1 and 2 of the Act, it may impose a financial penalty in respect of the breach which,

- may be of such amount as the authority imposing it determines; but
- must not exceed £30,000.

Only one penalty may be imposed on the same property agent in respect of the same breach.

For example, where an agent has failed to prominently display their membership certificates across multiple offices (providing each office belongs to the same legal entity) this is treated as one financial penalty as it is for the same breach. However, a further penalty may be imposed on the same property agent in respect of the same breach where there is a continuing breach of duty. The further penalty can be imposed where (a) the breach continues after the end of the relevant period, or (b) having validly appealed the previous final notice the breach continues after the end of a further period of 28 days (which begins the day after the appeal is determined, withdrawn or abandoned).

Where the authority considers that the requirements of the regulations have been breached, it must give written notice of their intention to impose a penalty setting out the reasons and the amount of the penalty, a Notice of Intent. The lettings agent or property manager has 28 days to make written representations or objections to the authority, starting from the day after the date the Notice of Intent was sent. At the end of the 28-day period, Council will decide, having taken into account any representations received, whether to impose the fine and, if so, must issue a Final

Notice to the lettings agent or property manager giving at least 28 days for payment to be made.

A lettings agent or property manager can appeal against the penalty to the First-tier Tribunal. The appeal must be made within 28 days of the day on which the Final Notice was sent.

Appendix 15 - The Client Money Protection Schemes for Property Agents (Requirement to Belong to a Scheme etc.) Regulations 2019

It is the duty of the Council to enforce the requirements of Regulations 3 and 4 in its area.

Regulation 3 – Requirement to belong to an approved client money protection scheme from 1 April 2019.

Regulation 3 requires all letting agents and property managers in England to join one of the six Government approved Client Money Protection schemes:

- [Client Money Protect](#)
- [Money Shield](#)
- [Propertymark](#)
- [RICS](#)
- [Safeagent \(previously NALS\)](#)
- [UKALA Client Money Protection](#)

Regulation 3 requires property agents that hold money on behalf of a client to belong to an approved or designated client money protection scheme in order to afford protection to that client against the loss, theft, misappropriation, etc. of their funds and make associated provision.

Regulation 3 - Definitions

“letting agency work” means things done by a person in the course of a business in response to instructions received from

- b) a person (“a prospective landlord”) seeking to find another person to whom to let housing, or
- c) a person (“a prospective tenant”) seeking to find housing to rent.

“letting” includes the grant of a licence, but except in Chapter 4, does not include the grant of a tenancy or licence for a term of more than 21 years.

“letting agency work” does not include any of the following things

- a) publishing advertisements or disseminating information.

- b) providing a means by which a prospective landlord or a prospective tenant can, in response to an advertisement or dissemination of information, make direct contact with a prospective tenant or a prospective landlord.
- c) providing a means by which a prospective landlord and a prospective tenant can communicate directly with each other.

“English property management work” means things done by a person in the course of a business in response to instructions received from another person (“the client”) where:

- a) the client wishes the person to arrange services, repairs, maintenance, improvements or insurance in respect of, or to deal with any other aspect of the management of, premises on the client's behalf, and
- b) the premises consist of housing in England let under a tenancy.

“client money” means

- a) The rent.
- b) Utilities, council tax and communication services.
- c) Monies paid to a property agent for repairs and maintenance work.
- d) Maintenance floats.
- e) Miscellaneous money.
- f) Unprotected security deposits.
- g) Holding deposits.

The requirement to belong to a Client Money Protection Scheme only applies to agents carrying out lettings or property management work and who are holding client money.

Agents can demonstrate that they do not hold client money by providing evidence which may take the form of, but is not limited to:

- Evidence that the tenant pays rent directly to landlord – contact between landlord and agent and/ or bank statements.
- Evidence that deposits are paid directly to the landlord for the landlord to make arrangements to protect this money with an authorised Tenancy Deposit Scheme.
- Evidence that any invoices for maintenance of services or remedial work on a client property is given directly to the client to pay.

Client money protection applies to tenancies and grants of licence of less than 21 years. Therefore, activities associated with lettings of 21 years or over are outside the scope of the Requirement Regulations 2019.

Regulation 4 - Transparency requirements

Regulation 4 of the Requirement Regulations 2019 defines the transparency requirements for property agents who are required to be a member of an approved client money protection scheme.

An agent is required to display the certificate confirming their membership of an approved client money protection scheme prominently in their office(s) and on their website. Furthermore, this certificate must be displayed in a visible location in each of the agent's premises in England at which the agent deals face-to-face with persons using or proposing to use the agent's services as a property agent.

As best practice agents should also publish a copy of their membership certificates on third party websites (any portal on which a property to let is advertised, for example, Rightmove, Zoopla or Facebook) and the certificate should be published alongside listings on portals.

The first part of the transparency requirements also requires an agent to produce a copy of the certificate from their approved client money protection scheme to any person (which includes enforcement authorities) who may reasonably require it, free of charge.

This first part will only apply if the scheme administrator of an approved or designated client money protection scheme has provided a certificate as required under regulation 8(1) of the Approval Regulations 2019.

In the event a property agent has its membership from an approved client money protection scheme revoked or becomes a member of a different approved client money protection scheme the agent must notify each of its clients in writing of this change in circumstances within 14 days of the occurrence.

This obligation exists whether or not the separate obligations in the first part of the transparency requirements (which relate to certificates of membership, as above) also apply. Therefore, In the event that a property agent joins an approved scheme but does not receive their certificate of membership and then decides to join another scheme they are still required to write to their clients informing them of this change in circumstance.

An agent must not display a client money protection scheme certificate suggesting they are a member of an approved scheme if they do not hold this membership. This includes agents who were previously members, but whose membership has been revoked or lapsed.

How the Council enforces the Regulations

Breaches of the Regulations for property agents in England to become a member of an approved client money protection scheme or adhere to the transparency requirements are civil breaches with financial penalties.

Where the Council is satisfied beyond reasonable doubt that a property agent has breached the requirements of Regulation 3 (to belong to an approved client money protection scheme), it may impose a financial penalty in respect of the breach which;

- may be of such amount as the authority imposing it determines; but
- must not exceed £30,000.

Where the Council is satisfied beyond reasonable doubt that there is a breach of Regulation 4 (Transparency Requirements) it may impose a financial penalty in respect of the breach which,

- may be of such amount as the authority imposing it determines, but
- must not exceed £5,000.

Only one penalty may be imposed on the same property agent in respect of the same breach. For example, where an agent has failed to prominently display their membership certificates across multiple offices (providing each office belongs to the same legal entity) this is treated as one financial penalty as it is for the same breach. However, a further penalty may be imposed on the same property agent in respect of the same breach where there is a continuing breach of duty.

The further penalty can be imposed where:

- a) the breach continues after the end of the relevant periods, or
- b) having validly appealed the previous final notice the breach continues after the end of a further period of 28 days (which begins the day after the appeal is determined, withdrawn or abandoned).

Where the authority considers that the requirements of the regulations have been breached, it must give written notice of their intention to impose a penalty setting out the reasons and the amount of the penalty, a Notice of Intent. The lettings agent or property manager has 28 days to make written representations or objections to the authority, starting from the day after the date the Notice of Intent was sent.

At the end of the 28-day period, Council will decide, having taken into account any representations received, whether to impose the fine and, if so, must issue a Final Notice to the lettings agent or property manager giving at least 28 days for payment to be made.

A lettings agent or property manager can appeal against the penalty to the First-tier Tribunal. The appeal must be made within 28 days of the day on which the Final Notice was sent.

The Council can impose further penalties if a lettings agent or property manager fails to join a Client Money Protection scheme despite already having had a penalty imposed. There is no limit to the number of penalties that may be imposed on an individual letting agent or property manager if they continue to fail to join a scheme.

Each scheme publishes a list of members on their respective website, so it is possible to check whether a lettings agent or property manager has joined one of the schemes.

Appendix 16 - The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014

The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014 came into force on the 1st October 2014.

All letting agents and property managers in England are required to join one of the two Government approved redress schemes:

- [Property Redress Scheme](#).
- [The Property Ombudsman](#).

'Lettings agency work' is things done by an agent in the course of a business in response to instructions from:

- a private rented sector landlord who wants to find a tenant, or
- a tenant who wants to find a property in the private rented sector.

It applies where the tenancy is an assured tenancy under the Housing Act 1988 (the most common type of tenancy) except where the landlord is a private registered provider of social housing or the tenancy is a long lease.

Lettings agency work does not include the following things when done by a person who only does these things:

- publishing advertisements or providing information.
- providing a way for landlords or tenants to make direct contact with each other in response to an advertisement or information provided.
- providing a way for landlords or tenants to continue to communicate directly with each other.

Employers who find homes for their employees or contractors; higher and further education authorities and legal professionals are excluded from the requirement.

Property management work means things done by a person in the course of a business in response to instructions from another person who wants to arrange services, repairs, maintenance, improvement, or insurance or to deal with any other aspect of the management of residential premises.

For there to be property management work, the premises must consist of, or contain:

- a) a dwelling-house let under a long lease - "long lease" includes leases granted for more than 21 years, leases granted under the right to buy, and shared ownership leases,
- b) an assured tenancy under the Housing Act 1988, or
- c) a protected tenancy under the Rent Act 1977.

Property management work would arise where a landlord instructed an agent to manage a house let to a tenant in the private rented sector. It would also arise where one person instructs another to manage a block of flats (often with responsibility for the common areas, corridors, stairwells etc.) that contains flats let under a long lease or let to assured or protected tenants.

The legislation applies to people who in the course of their business manage properties, for example, high street and web-based agents, agents managing leasehold blocks and other organisations who manage property on behalf of the landlord or freeholder.

The requirement to belong to a redress scheme does not apply to Managers of commonhold land, student accommodation and refuge homes; receivers and insolvency practitioners; authorities where Part 3 of the Local Government Act 1974 applies; right to manage companies; legal professionals and property managers instructed by local authorities and social landlords.

The requirement to belong to a redress scheme only applies to agents carrying out lettings or property management work 'in the course of business'. The requirement will therefore not apply to 'informal' arrangements where a person is helping out rather than being paid for a role which is their usual line of work. Some examples of 'informal arrangements' which would not come under the definition of 'in the course of business' are set out below:

- someone looking after the letting or management of a rented property or properties on behalf of a family member or friend who owns the property/properties, where the person is helping out and doesn't get paid or only gets a thank you gift.
- a friend who helps a landlord with the maintenance or decoration of their rented properties on an ad hoc basis.
- a person who works as a handyman or decorator who is employed by a landlord to repair or decorate their rented property or properties when needed.

- a landlord who looks after another landlord's property or properties whilst they are away and doesn't get paid for it.
- a joint landlord who manages the property or properties on behalf of the other joint landlords.

One of the key issues to consider when deciding what could be considered an 'informal arrangement' is whether the person doing the letting or property management work is helping out an individual as opposed to offering their services to anyone who wants to use and pay for them.

Where the authority considers that the requirements of the regulations have been breached, it must give written notice of their intention to impose a penalty setting out the reasons and the amount of the penalty, a Notice of Intent. The lettings agent or property manager has 28 days to make written representations or objections to the authority, starting from the day after the date the Notice of Intent was sent. At the end of the 28-day period, Council will decide, having taken into account any representations received, whether to impose the fine and, if so, must issue a Final Notice to the lettings agent or property manager giving at least 28 days for payment to be made.

A lettings agent or property manager can appeal against the penalty to the First-tier Tribunal. The appeal must be made within 28 days of the day on which the Final Notice was sent.

The Council can impose further penalties if a lettings agent or property manager fails to join a redress scheme despite already having had a penalty imposed. There is no limit to the number of penalties that may be imposed on an individual lettings agent or property manager if they continue to fail to join a scheme.

Each scheme publishes a list of members on their respective websites, so it is possible to check whether a lettings agent or property manager has joined one of the schemes.

Appendix 17 - The Immigration Act 2014

Right to Rent was introduced under Part 3 of the Immigration Act 2014 as part of the government's reforms to build a fairer and more effective immigration system.

UK Visas and Immigration are the enforcing authority. Under the new regulations, landlords will be required to check a potential tenant's 'Right to Rent' and those who fail to do so may face a penalty of up to £3,000 per tenant.

The regulation will mean that private landlords, including those who sub-let or take in lodgers must check the right of prospective tenants to be in the country. The government has portrayed the issue of 'beds in sheds' as being about illegal immigration and tackling it has become part of wider government measure to clamp down on undocumented migrants as has the Housing and Planning Act.

Appendix 18 - The Caravan and Control of Development Act 1960

The Caravan and Control of Development Act 1960 prohibits the use of land as a caravan site unless the occupier holds a site licence issued by the Council.

Before a licence can be granted, a caravan site must first be granted Planning Consent. Once a Planning Consent has been granted, a Caravan Site Licence must be applied for and will be issued.

A caravan site licence contains provisions relating to the maintenance and running of the park. The primary purposes of the licence being to ensure that the risk of spread of fire is minimised, that there is appropriate access to the site for emergency services and that the facilities provided are appropriate to the nature and size of the site.

To ensure that this is done the licence is issued subject to the conditions based on the adopted model standards for caravan sites and a copy of the licence is displayed on site. The Council will carry out site inspections to ensure that the conditions are being complied with.

In addition to the site licence, the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 ("the Regulations") introduces a fit and proper person test for mobile home site owners or the person appointed to manage the site.

Equality Impact Assessment

EIA-795626658 - Private Sector Housing Enforcement Policy 2026-2031

Details

Title	Private Sector Housing Enforcement Policy 2026-2031
Author	Adrian Chowns (Head of Safer Housing and Communities)
Head of Service	Davina Blackburn (Strategic Lead - Regulation and Communities)
Cabinet Member	Councillor Naeem Akhtar and Councillor Abdul S Khan (Policing and Equalities)
Director	Julie Newman (Law and Governance)

Context and background

EIA carried out on	Review of policy or strategy

New and updated legislation in the form of the Renters Rights Act 2025 has been provided by Government to deal with certain offences regarding housing in the Private Rented and Social Housing sectors.

In order for the Council to use these powers, it must have reviewed and updated its enforcement policy setting out how it will implement these powers in relation to properties in the PRS and social housing. The original policy was approved in 2018 and reviewed in 2021 and since that time new powers have been introduced that are now incorporated into the amended policy document.

Background

Before the introduction of the Renters Rights Act, landlords had more freedom to raise rent multiple times, and notice periods varied and were sometimes shorter. Rent reviews were often tied to fixed-term renewals and tenants felt unsure about challenging increases due to the fear of retaliatory eviction.

After the new provisions of the Act are introduced (1st May 2026) there will be stricter controls on the rent increases, with landlords only being allowed to do this once per year, as well as stronger protections in relation to the eviction process and tenancy reforms which improve security of tenure and create fairness in the private rented sector.

Stakeholders

Internal services
Regulatory Services
Planning
Housing and Homelessness

External
Housing Associations
Landlords
Tenants
Managing/Letting Agents
Residents
Police
Citizens Advice
Advisory bodies

Responsibility

Safer Housing and Communities service

Consideration of impact

Baseline data and information

The growth of the PRS has been a significant change in the housing market in Coventry. In 2011 there were 21% of households living in the PRS which rose to 33% (48,708) in 2021. The percentage of PRS properties in each ward ranges from between 67% (St Michaels) to 17% (Bablake). 16 out of the 18 wards in Coventry have a higher percentage of PRS than that of the national average (19%).

In 2022 the Council carried out a stock survey of the PRS which found that:

- Coventry is the 64th most deprived local authority out of the 333 in England.
- Coventry has a high proportion of high deprivation wards. 9 out of 18 wards have IMD rankings below the national average and 3 wards are in the lowest 30% nationally.
- There are over 11,000 private rented properties in Coventry that are likely to have a serious Category 1 hazard. This equates to 23% of the PRS stock meaning 1 in 3 privately rented homes is likely to have a serious home hazard, almost double that of the national average.
- 898 PRS properties have F and G energy performance rating - fail statutory minimum requirements.
- There are a significantly higher proportion of PRS properties in fuel poverty (18.5%) than nationally (13.8%).

The Renters Rights Act 2025 is designed to improve the private renting experience for landlords and tenants. The details of the new powers are detailed in the policy and approval will ensure the Council meets its statutory duty to enforce the legislation.

Marmot Principles

1.	Give every child the best start in life
3.	Ensure a healthy standard of living for all
5.	Create and develop healthy and sustainable places and communities
8.	Pursue environmental sustainability and health equity

Protected groups - Impact on Coventry Residents and Visitors

Age 0-18

Positive impact - Positive impact - The implementation of the policy will ensure the

Council fulfils its statutory duty in relation to the Renters Rights Act, which will provide greater housing security for families. The Council has been provided stronger powers to enforce compliance and tackle rogue landlords.

The Act abolishes Section 21 "no-fault" evictions, meaning landlords can no longer evict tenants without a valid reason. For children and young people, this translates into more stable living environments, as families with children will not face sudden displacement, reducing disruption to schooling and social networks.

There will also be a lower risk of homelessness, as more security of tenure helps prevent situations where families with minors are forced into temporary accommodation or sofa-surfing.

The provisions relating to "Protection Against Discrimination" explicitly bans discrimination against tenants with children or those receiving benefits. This is crucial because families with children often faced barriers in accessing private rentals due to blanket bans. By removing these barriers, the Act ensures equal access to housing, supporting children's right to a safe home.

Furthermore, the duties placed on the Council will enable it to improve housing standards to ensure properties meet minimum quality standards, reducing health risks such as damp and mould.

This is particularly important for children, as poor housing conditions are linked to respiratory illnesses and developmental issues.

The Act also caps advance rent requests and bans rental bidding wars. For families with limited income, this will result in lower upfront costs, making it easier to secure housing whilst reducing the financial stress.

Stable, safe, and affordable housing is foundational for children's health, education, and emotional well-being. By reducing eviction risks, improving housing standards, and banning discriminatory practices, the Council can create a more secure environment for young people to thrive.

Age 19-64

Positive impact - Positive impact - This age range often includes working professionals, parents, and those transitioning between life stages. The Act supports:

Career mobility: Flexible tenancies allow relocation without penalties.

Financial resilience: Predictable rent and lower upfront costs ease budgeting.

Health and wellbeing: Safer, better-quality homes reduce stress and illness.

As above in relation to greater security and stability, reducing homelessness risk, financial protections, improved housing standards, stronger enforcement and redress and impartial resolution of disputes without costly court action.

Local authority enforcement powers: Tenants can rely on councils to tackle rogue landlords and unsafe housing.

Inclusivity and Equal Access

Ban on discrimination: Landlords cannot refuse tenants based on benefits or family status, ensuring fair access for single adults, couples, and families.

Pet ownership rights: Adults can request to keep pets, improving wellbeing and flexibility.

Age 65+

Positive impact - Positive impact - Older renters are the fastest-growing segment in the rental market, often choosing to rent for flexibility, downsizing, or avoiding home maintenance burdens. The Act ensures:

- * Health and wellbeing: Safer, warmer homes reduce hospital admissions.
- * Financial security: Predictable costs and reduced upfront payments ease budgeting.
- * Dignity and independence: Strong protections allow older adults to age in place without fear of eviction.

Older adults often face anxiety about sudden displacement. The Act abolishes Section 21 “no-fault” evictions, meaning:

- * Tenancies can only end for valid reasons, reducing the risk of abrupt moves.
- * This stability is crucial for older renters who value continuity for health, social ties, and access to local services.

Improved Housing Standards - The Act introduces the Decent Homes Standard into the private rented sector: Homes must meet minimum quality standards, tackling issues like damp, mould, and unsafe conditions. Older people are particularly vulnerable to cold and poor housing, which can exacerbate respiratory and mobility issues.

Disability	Positive impact - Positive impact - Disabled renters often face compounded challenges—limited housing options, higher risk of discrimination, and vulnerability to unsafe conditions. The Renters’ Rights Act addresses these by: Creating a fairer, more inclusive rental market. Improving housing quality and security. Providing accessible enforcement routes without costly litigation.
Gender reassignment	Positive impact - Positive impact - People undergoing gender reassignment often face heightened risks of housing discrimination and instability. The Renters’ Rights Act addresses these by: Creating a fairer, more inclusive rental market. Providing robust enforcement and accessible dispute resolution. Supporting continuity and wellbeing during a critical life stage. The Act reinforces existing equality protections under the Equality Act 2010, making it unlawful for landlords or agents to discriminate against tenants based on gender reassignment. It bans blanket policies that indirectly discriminate, such as refusing tenants on benefits or imposing arbitrary restrictions that disproportionately affect marginalised groups. Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action. The Council will have stronger enforcement powers to protect the rights of people undergoing gender reassignment.
Marriage and civil partnership	Positive impact - Positive impact - The Act supports stability, affordability, and fairness—key priorities for couples building a life together. It reduces financial stress, improves housing quality, and ensures equal treatment in the rental market.
Pregnancy and maternity	Positive impact - Positive impact - Pregnancy is a protected characteristic under equality and housing laws. The Renters’ Rights Act strengthens these protections by: Creating a fairer, more inclusive rental market. Providing stability and security during a critical life stage. Ensuring safe, decent housing for maternal health and wellbeing.

Race

Positive impact - Positive impact - The Act reinforces existing equality laws, making it unlawful for landlords or agents to discriminate based on race or ethnicity.

It bans indirect discriminatory practices, such as blanket bans on certain groups or benefit recipients, which often disproportionately affect minority communities.

Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action.

The Council has stronger powers to enforce compliance and protect vulnerable tenants.

The Ombudsman provides an impartial route for resolving disputes, ensuring equal access to justice for all racial groups.

People from minority ethnic backgrounds often face higher risks of discrimination, overcrowding, and poor housing conditions. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental market.
- Improving housing quality and security.
- Providing robust enforcement and accessible dispute resolution.

Religion and belief

Positive impact - Positive impact - People of different religions and beliefs often face subtle or overt discrimination in the rental market. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental environment.
- Providing robust enforcement and accessible dispute resolution.
- Supporting stability and respect for cultural and religious practices.

The Act reinforces existing equality laws, making it unlawful for landlords or agents to discriminate against tenants based on religion or belief.

It bans indirect discriminatory practices, such as blanket restrictions that could disproportionately affect certain faith groups.

Tenants who experience discrimination can seek redress through the new Private Rented Sector Ombudsman, offering a quicker and less costly alternative to court action.

The Council has stronger enforcement powers to support this group.

Sex

Positive impact - Positive impact - People of different sexes may experience systemic inequalities in income, employment, and housing access. The Renters' Rights Act addresses these issues by:

- Creating a fairer, more inclusive rental market.
- Providing robust enforcement and accessible dispute resolution.
- Supporting stability and equal opportunity for all tenants.

Sexual orientation

Positive impact - Positive impact - People of different sexual orientations often face subtle or overt discrimination in the rental market. The Renters' Rights Act addresses these issues by:
Creating a fairer, more inclusive rental environment.
Providing robust enforcement and accessible dispute resolution.
Supporting stability and equal opportunity for all tenants.

Additional groups

Care experienced

Positive impact - Positive impact - Carers often experience housing insecurity and financial strain while supporting dependants. The Renters' Rights Act addresses these challenges by:
Creating a fairer, more inclusive rental market.
Ensuring safe, stable housing for those providing and receiving care.
Offering accessible enforcement mechanisms to uphold rights.

Armed forces

Positive impact - Positive impact - Service personnel and their families often face unique housing challenges due to frequent relocations and deployments. The Renters' Rights Act addresses these by:
Offering flexibility and security in tenancy arrangements.
Ensuring fair treatment and decent living conditions.
Providing accessible enforcement mechanisms for peace of mind.

Socio economic groups

Positive impact - Positive impact - Different socio-economic groups face varied challenges:
All income households will benefit from affordability measures and stronger protections against eviction.
Gain stability and predictability in rent, supporting long-term planning.
Enjoy improved standards and fair dispute resolution without unnecessary costs.
The Act creates a fairer, more inclusive rental market, reducing inequalities and promoting housing security for all.

Next steps

Inequality	Action	Owner	Timescale

Monitor and evaluation

KPIs will be included within the Safer Housing and Communities performance management system, which will be used to monitor and evaluate the effectiveness of the services being provided to meet the requirements of the Act.
A review of the effectiveness of the policy approach for the Council will be carried out in 2027.

Impact on Council staff

Will there be an impact?

Yes

Nature of impact and any mitigation required

The approval of the policy has the potential to impact the organisation in future years. Although the Safer Housing and Communities service has restructured to plan ahead as the legislation is introduced, there may be future potential human resource implications. These will be monitored and reviewed regularly and, where possible, mitigated through the use of New Burdens funding and income from civil penalties. The current duties will be carried out using existing resources; however, there may be a need to restructure the service in future years. Additional training will also be required which will be funded from income.

Impact on Council staff - Sex

Female 40

Male 57

Impact on Council staff - Disability

Disabled

Not disabled
Prefer not to state
Unknown

Impact on Council staff - Ethnicity

White
Black, Asian, minority ethnic
Prefer not to state
Unknown

Impact on Council staff - Sexual orientation

Heterosexual
LGBT+
Prefer not to state
Unknown

Impact on Council staff - Age

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

Impact on Council staff - Religion

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

Completion statement

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

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Public report Cabinet Report

Scrutiny Co-ordination Committee
Cabinet

12th March 2026
17th March 2026

Name of Cabinet Member:

Cabinet Member for Education and Skills – Councillor Dr K Sandhu

Director Approving Submission of the report:

Director for Children and Education Services

Ward(s) affected:

All

Title: Coventry One Strategic Plan and Education Capital Programme 2025 - 2029

Is this a key decision?

Yes - the proposals will significantly affect all wards.

Executive Summary:

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

The Coventry One Strategic Plan sets out pupil forecasts for primary and secondary schools, and Special Education Needs (SEND), across education planning areas in response to pupil cohorts across the city. It is proposed that this Strategy will be a flexible plan, which is able to adapt to shifting mechanisms of parental preference, unforeseen changes in supply and demand of school places, and future birth rates. To do this, officers regularly review school place planning, and the One Strategic Plan will be monitored and updated annually with presentation to the Cabinet.

There is commitment through a statement of intent to: collaborate and work in partnership to achieve the best possible outcomes for children and young people in Coventry; ensure the sustainability of Coventry schools; and to enable the City Council to meet its statutory obligations. The options within the Strategic Plan have been discussed at Coventry Education Partnership meetings, which include academy trust CEOs, headteachers and education colleagues from across the city.

The Strategy outlined within the One Strategic Plan appendix is in line with Department for Education (DfE) statutory requirements to:

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

Capital allocations to meet projected shortfalls in provision are provided by the DfE to all Local Authorities based on the data provided in the annual School Capacity return (SCAP). Demand for places, minus the supply of places, is multiplied by a cost per pupil place to inform the final allocation. This return informs the DfE of the expected change in pupil numbers over the medium term, the current capacity of schools to meet those numbers, and the planned changes to that capacity. Funding is also secured via S106 contributions from housing developers in response to new housing estates. The proposed programme of work is fully funded utilising existing resources as set out within the education capital programme.

From the 2021/22 academic year there has been a large increase in the number of pupils moving into the city in-year. The impact of this in-year movement has been that more places are required in schools than originally forecast, using up spare capacity, and causing sufficiency pressures in some year groups. In response a review and update of pupil forecast methodology has taken place, and additional school expansions identified within this report. Since September 2024 in-year growth has decreased, and we continue to factor a range of growth expectations to inform forecasts and ensure sufficient supply of school places.

Since the academic year 2021/2022 bulge classes have been introduced at nine primary schools across the city in Years 1 to 5. This increase in demand has also required expansions in secondary schools, particularly in Years 7 and 8. These measures have helped address immediate pressures on school capacity; however, further expansion will be necessary to ensure sufficient school places are available to meet future forecast demand. Ongoing planning and funding will be essential to maintain access to quality education as the pupil population changes.

Recommendations:

Scrutiny Co-ordination Committee is recommended to consider the report and make any comments/recommendations to the Cabinet.

The Cabinet is recommended to:

1. Consider any comments/recommendations from Scrutiny Co-ordination Committee.
2. Authorise the programme of work outlined within the proposed Coventry One Strategic Plan for Primary, Secondary and Special Educational Needs Education as set out in appendix 1.
3. Delegate authority to the Director of Children and Education Services to agree the most appropriate procurement route for works to be delivered and awarded.

List of Appendices included:

Appendix 1: One Strategic Plan 2025-2029

Background papers:

None

Other useful documents

Coventry One Strategic Plan and Education Capital Programme
Cabinet Report – 10th June 2025

[Coventry One Strategic Plan and Education Capital Programme 2024 – 2028](#)

Coventry One Strategic Plan and Education Capital Programme
Cabinet Report – 13th February 2024

[Coventry One Strategic Plan and Education Capital Programme 2023 - 2027.pdf](#)

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

Yes - Scrutiny Co-ordination Committee 12th March 2025

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

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1. Context (or background)

- 1.1. The Coventry One Strategic Plan sets out pupil forecasts for primary and secondary schools, and Special Education Needs & Disability (SEND), in response to changing pupil cohorts across the city. It outlines the strategy proposed by the City Council and the Coventry Education Partnership to provide the additional places required in all phases of education (Early Years, Primary, Secondary and SEND) from 2025 – 2029.
- 1.2. The City Council holds the statutory duty to ensure sufficiency of places. This is done in consultation with all schools including Academies and Free Schools, where admissions arrangements are outside of City Council control. Early discussions and partnership with all schools is crucial to delivering the required number of school places across the city.
- 1.3. There is an expectation that Local Authorities ensure a level of surplus capacity across mainstream provision. This is necessary to deal with fluctuations in population and growth, support parental preference, and help manage in-year movement.
- 1.4. In response to increased pupil numbers in Coventry bulge classes have been created at 9 primary schools in the city across years 1 to 5, and at secondary in years 7 and 8. Further expansion is required to ensure there are sufficient school places to meet forecast demand.
- 1.5. The Department for Education (DfE) provides each Local Authority with an annual update on the estimated cost of providing a school place nationally with a local variation. Coventry uses these figures to inform their S106 contributions from housing developers. Accordingly, the cost per pupil place as outlined in the appendix has been updated to reflect this change.

2. Primary

- 2.1. The birth rate across Coventry for Reception entry from 2024 to 2028 is increasing slightly each year in comparison to the previous decline between 2012 and 2023. Although these increases are relatively small, they are a stable picture of just over 4,000 births per academic year in the city.
- 2.2. The current Year 5 cohort is currently the largest cohort in Coventry primary schools with circa 4,660 pupils. The year 5 cohort is due to transition to secondary schools in September 2027.
- 2.3. The current forecast is that in-year application levels have begun to stabilise, following the significant growth seen in 22/23 and 23/24. While this has eased immediate pressure in some areas, the impact of the growth continues to challenge sufficiency as larger cohorts move through the primary phase.
- 2.4. In September 2024 bulge classes were opened in the following Primary Schools: All Saints Church of England, Hill Farm, Frederick Bird Academy, Charter Academy,

John Gulson and Howes. This was to ensure sufficiency of places, but also considered viability for schools, and value for money.

- 2.5. Further expansion of primary provision is expected to be focused in areas where there is significant planned new housing. Land for new primary provision has been identified in Keresley and Eastern Green to allow new schools to open when there is sufficient demand for new places. The timing of this is linked to build out rates of the housing developments.

3. Secondary

- 3.1. Since September 2018, additional capacity has been added into the secondary sector to provide for the larger cohorts identified through pupil forecasts. As agreed at Coventry Education Partnership meetings, the plan has been to deliver and adopt a model of both permanent and temporary expansions to ensure sufficiency of places, viability for schools, and value for money. Temporary expansions are for a single year (e.g. Year 7 increase which moves through the school until the cohort reaches Year 11). Adopting a mixed economy model of permanent and temporary expansions will support the future viability of schools and in the longer term will allow for a more flexible approach to be adopted by increasing and reducing capacity as required.
- 3.2. Phase one (2018 to 2021) resulted in the creation of 544 additional Year 7 places through a combination of temporary and permanent expansions at 16 Secondary schools in Coventry.
- 3.3. Phase two (2022-2024) focused on addressing the projected shortfall of school places through the creation of additional temporary bulge classes. This was done to ensure sufficient surplus places across the city. For 2024, plans were adjusted (from 6 to 10 forms of entry) in response to a rise in in-year applications. During this period 810 additional places were created across 11 secondary schools in Coventry.
- 3.4. Phase three (2024-2027) was developed to ensure sufficient future secondary school places for additional pupils from in-year admissions (academic years 21/22 - 23/24) in the primary sector. Phase three will be reviewed annually in line with the updated pupil forecasts and expansion plans adjusted if required. Since 2018 there have been temporary or permanent expansions at 19 out of 22 secondary schools in the city. Due to site constraints, and other factors, most existing schools have limited ability to expand further.
- 3.5. The Education Service has worked in partnership with schools to either re-utilise former bulge (temporary) classes or introduce new bulge (temporary) classes as part of the One Strategic Plan 2018-2024.
- 3.6. Local Authorities are required to ensure there is a level of surplus capacity to meet parental preference, manage in-year movement, and account for variations in pupil population. The strategy outlines a plan to ensure there is at least 2% surplus capacity in Year 7 places through the admissions coordinated scheme. This proactive measure should also reduce the need for future reactive bulge classes.
- 3.7. Based on current forecasts, including the reduced in-year growth seen last academic year, it is expected additional capacity will be required up to and including 2029. Beyond this date the need for places will depend on future levels of in-year

movement, birth rates, and other national policies. The City Council will continue to work with all schools to manage the supply and demand for school places, including consideration for published admission number (PAN) reduction, where appropriate.

- 3.8. There are 3 further secondary school expansions planned for September 2027, these are President Kennedy, Westwood and Cardinal Wiseman. Work is underway to deliver the additional space required on the existing school sites. These expansions are subject to planning consent and delivery of building works.

4. Special Education Needs and Disability (SEND)

- 4.1. Local Authorities have a statutory duty to ensure, that all pupils who have an Education, Health and Care Plan (EHCP) receive the provision required to meet their assessed needs. Coventry has 8 special school provisions, and 10 specialist provisions delivered in the form of resourced centres/units in mainstream schools. This is to ensure provision can meet the continuum of needs.
- 4.2. Recent evidenced growth in need, alongside an increase in in-year admissions and extended retention in post 16 provision (specifically in the areas of learning disability, complex communication) has placed an unprecedented level of demand on the specialist system. This reflects the national position.
- 4.3. Since 2016 the City Council have seen a 130% increase in the number of EHCPs maintained. This is in line with the national position. If this rate of growth continues for the next five years it is forecast for Coventry to maintain just over 5,000 EHCPs by 2030. This level of growth is larger than the mainstream population growth meaning a higher proportion of children within Coventry have identified additional needs than in previous years. Broadly 42% of children with an EHCP are placed in mainstream schools, 33% in special schools, 12% in further education and 13% have other arrangements including independent sector or Alternative Provision. The total proportion of EHCPs maintained for young people aged 17 to 25 is approximately 20%.
- 4.4. Between September 2017 and 2025 there have been 500 places added across the eight special schools and have included a combination of permanent building projects and reconfiguration of existing space within schools. Over the last academic year, a new secondary Enhanced Resource Provision (ERP) has opened at Blue Coat Secondary School and further primary ERP's are being developed. This report details further expansion required.

5. Options considered and recommended proposal.

5.1. Primary Schools options and recommended proposal

- 5.1.1 Land has been identified for primary provision at 2 large housing developments in the city, one at Eastern Green Sustainable Urban Environment (SUE) and the other as part of the Keresley SUE. These remain crucial to ensuring sufficiency of places in the longer term whilst the housing developments are in progress and completed. The option to relocate and expand existing schools is also being explored, and the projects will be progressed in line with receipt of funding and demand for places in the area.

- 5.1.2 Expansion of Keresley Grange Primary School to 2 forms of entry (60 PAN) will provide an interim solution to the current pressure on places in this area of the city. Keresley Grange Primary School currently has a PAN of 45, requiring the operation mixed year group classes. The school is over capacity, and this is putting significant pressure on teaching spaces, capital investment will provide a solution to this.
- 5.1.3 The Strategic Energy Partnership (SEP) is currently developing proposals to enhance the school estate by providing investment for solar panels, plantroom insulation and heating improvements. The funding for this programme of work is still undecided but is likely to involve a power purchase agreement (PPA) rather than grant funding. The schools will also benefit from education engagement sessions via the SEP Social Value Fund.

5.2 **Secondary School options and recommended proposal**

- 5.2.1 The approach in phases one to three has created flexible provision that allows schools to be flex in response to sufficiency requirements (e.g. increase and reduce PAN as required). This approach has been effective in responding to the City's sufficiency challenges and has demonstrated efficient use of resources. It is planned that provision added in previous phases (e.g. temporary expansion) is re-utilised to provide additional classes required for future need, as required.
- 5.2.2 The largest cohort in the city is currently year 5, this cohort moves through to secondary in September 2027. To ensure sufficient school places, expansions are underway at President Kennedy, Westwood and Cardinal Wiseman. Each school will require capital investment, as set out in the capital programme and this will allow expansion by 3 forms of entry in total.
- 5.2.3 Based on current projections and existing admission trends it is anticipated that following these expansions, there will be no further requirement for additional secondary school places. Pupil number forecasts are regularly reviewed for accuracy and will be monitored and updated as appropriate.

5.3 **Special Education Needs and Disability (SEND) Options**

- 5.3.1 Building projects at Baginton Fields, Woodfield and Sherbourne Fields special schools have commenced to provide additional specialist school places. These projects will add circa. 190 additional places in a phased approach.
- 5.3.2 In addition to the expansion of special schools, additional school places are being created by adding ERP's within mainstream schools. There are currently 10 ERPs across the city accommodating 8-12 pupils per provision. The Education Service is planning to open a further 3 primary and 1 secondary ERP in 2026/27 and subject to expected policy direction in the white paper further are planned in subsequent years.

5.4 **Finance**

- 5.4.1 Basic need capital funding is allocated to Local Authorities to meet the demand for pupil places. Allocations have been announced up to the 27/28 academic year.
- 5.4.2 The City Council alongside other Local Authorities receives dedicated capital funding towards the expansion of special schools and alternative provision. It is

proposed the funds will be utilised to facilitate the relocation and expansion of Woodfield Special School and address building works required for expansion at Baginton Special School. The next allocation of High Needs Capital Funding is due to be announced in Spring 2026.

- 5.4.3 In the previous One Strategic Plan report (June 2025) the total capital programme resources reported were £243,102,422. No additional basic need grant has been awarded due to 2027/28 allocation being confirmed last year. There has been additional Section 106 funding secured to the value of £9,450,899, bringing the total capital programme resources to £252,553,321. This funding has been allocated against existing or planned projects as outlined within the updated One Strategic Plan.

Total Education Capital Programme resources (since 2019)	£252,553,321
Actual spend 19/20 - 24/25	£88,523,754
Forecast project spend 25/26 to 28/29	£107,444,755
Future projects required beyond 28/29	£56,584,812

6 Results of consultation undertaken

- 6.1 The City Council have consulted with headteachers via Coventry Education Partnership meetings when updating the One Strategic Plan. All schools must consult when undergoing changes to PAN, the City Council is responsible for conducting the consultation for maintained schools. Academies are required to consult for their expansion and inform the Department of Education of this consultation.

7 Timetable for implementing this decision

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

Activity	Approximate Timing
Consultation with Primary, Secondary and SEND Headteachers via Coventry Education Partnership meetings	January 2025 – January 2026
Report to Cabinet for adoption of the policy set out in the One Strategic Plan and recommendations	March 2026

8 Comments from the Director of Finance and Resources and the Director of Law, Governance and Safer Communities

8.1 Financial implications

- 8.1.1 Capital resources for the One Strategic Plan are a cumulation of several funding streams. Project costs are also indicative until the point of awarding contracts and therefore may differ from those currently anticipated.
- 8.1.2 The overall programme of works may need to be adjusted to ensure spend is not committed above the available resource and balanced against sufficiency requirements.
- 8.1.3 The revenue cost of places in mainstream schools is funded via the Schools Block element of the Dedicated Schools Grant (DSG). Within the Schools Block there is also a Growth Fund allocation, which enables revenue support to schools with in-year pupil growth which is not otherwise immediately recognised by the lagged funding system.
- 8.1.4 The revenue cost of places in specialist provisions for pupils with SEND is funded via the High Needs Block element of the DSG. This is an area of financial pressure at both a national and local level. Coventry continues to experience growth in the number of children and young people with Education, Health and Care (EHC) Plans but currently has an overall DSG surplus reserve balance. It has been announced that from 2028/29 onwards funding implications will be managed within the overall government Departmental Expenditure Limits (DEL) envelope, such that the government will not expect local authorities to need to fund future SEND costs from general funds. It is therefore key that the Council monitors the position and manages resources effectively to ensure that it remains within funding allocations (including the use of the DSG reserve) as far as is possible up to March 2028.
- 8.1.5 The government has confirmed they are committed to supporting local authorities who have accrued High Needs revenue deficits as the sector transitions to a reformed SEND system. The first phase of support will address historic deficits accrued up to the end of 2025/26. All local authorities with a High Needs deficit as of March 2026 (not applicable to Coventry) will be eligible to receive a High Needs Stability Grant covering 90% of their accrued deficit. The government will confirm at a later stage what support will be provided for any deficits arising in 2026/27 and 2027/28. They will take an appropriate and proportionate approach, though support in these years will not be unlimited. A Schools White Paper will be published in early 2026, which will detail changes to the SEND system and a requirement for Local Authorities to have a SEND Local Reform plan.

8.2 Legal implications

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

- 8.2.2 The Local Authority retains broad discretion in fulfilling its duty under Section 14 of the Education Act 1996 to ensure sufficient school places, but it must follow statutory processes when proposing to establish, discontinue, or alter schools. These procedures are outlined in the Education and Inspections Act 2006 and the School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013, as amended. Non-compliance with these statutory requirements can render proposed changes invalid and may prompt intervention by the Department for Education (DfE). While reductions to the published admission number (PAN) of maintained mainstream schools do not fall under the School Organisation Regulations, such changes must comply with consultation requirements set out in the current School Admissions Code (last updated 2021). Depending on the type of school, the responsible admission authority—whether it be the Local Authority for community and voluntary controlled schools, the governing body for voluntary aided and foundation schools, or the academy trust for academies—must consult appropriately before making changes.
- 8.2.3 The School Admissions Code provides that when changes are proposed to admission arrangements, all admission authorities must consult on their admission arrangements (including any supplementary information form) that will apply for admission applications the following school year. Where the admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities must consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period. Community and Voluntary Controlled schools have the right to object to the Schools' Adjudicator if the PAN proposed is lower than they would wish.

Land Acquisition

- 8.2.4 Section 120 of the Local Government Act 1972 provides that for the purposes of (a) any of the Council's functions under this or any other enactment or (b) the benefit, improvement or the development of the Council's area, the Council may acquire any land whether situated inside or outside its area.
- 8.2.5 Law and Governance Services will undertake the necessary legal due diligence including examining search results and the title for the property in order to ensure that the Council's interests are adequately protected. Enquiries before contract will be raised and the purchase will be subject to satisfactory results of the searches, a good and marketable title and a satisfactory survey and valuation result.

9 Other implications

9.1 How will this contribute to the One Coventry Plan?

This Strategy supports the One Coventry Plan priorities:

- Improving outcomes and tackling inequalities within our communities – Ensuring sufficiency of school places within each locality to create quality, accessible, and inclusive provision across the city.
- Tackling the causes and consequences of climate change – when delivering building works on school sites investment into environmental infrastructure is prioritised. Examples include implementing solar panels, air source heat pumps, and using local materials (where possible) to reduce the carbon footprint.

9.2 How is risk being managed?

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

9.3 What is the impact on the organisation?

There are no specific impacts on the organisation.

9.4 Equalities Impact Assessment

- 9.4.1 Over the past 3 academic years Coventry has experienced a significant increase in the number of pupils applying for a school place 'in-year'. To address this the City Council has implemented temporary and permanent additional classes to ensure adequate provision of school places. This reduces home to school travel distance for pupils removing a potential barrier to access education.
- 9.4.2 Children and young people with SEND can experience greater discrimination and may have fewer opportunities than children without SEND. The proposal aims to ensure that all Coventry children have access to education in accordance with their needs. Any revised accommodation changes and admission arrangements are compliant with the provisions of the Equality Act 2010 in the context of their possible impact on equal opportunities.
- 9.4.3 Public authority decision makers should have due regard to 1) the need to eliminate discrimination, 2) advance equality of opportunity between people who share a protected characteristic and those who do not 3) foster good relations between persons who share a relevant protected characteristic and people who do not (public sector equality duty - s 149(1) Equality Act 2010). The applicable protected characteristics are disability, gender reassignment; race, religion or belief, sex; sexual orientation, pregnancy or maternity.
- 9.4.4 Decision makers must be consciously thinking about these three aims as part of their decision-making process with rigour and with an open mind. The duty is to have "due regard", not to achieve a result but to have due regard to the need to achieve these goals. Consideration being given to the potential adverse impacts and the measures needed to minimise any discriminatory effects.
- 9.4.5 Each school has been assessed in line with the Disability Discrimination Act 2004' and meets the requirements of the Building Regulations and relevant British Standards including BS 8300 2009 and Approved Documents Part M. Specific provisions of inclusion for wheelchair users, and those that are hard of hearing and/or visually impaired, have been included in the designs. An access statement is provided for each school to act as an on-going live document. These document the initial building approach and become an effective building management tool for the users to ensure long term accessibility.

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

- 9.5.1 The Department for Education's Sustainability and Climate Change Strategy sets out a vision for the UK to be the world-leading education sector in sustainability and climate change by 2030. In England this will be achieved through awareness raising and practical steps to transition to net zero, such as creating a more resilient infrastructure to adapt to a changing climate and create a better environment around education settings (including enhancing biodiversity and improving air quality). The government set out the requirement for all education settings to have Climate Action Plans. Basic Need Allocations have also been uplifted by circa.10% for additional investment into energy efficiency projects.
- 9.5.2 Coventry has 117 schools (excluding private owned). Of these 117 schools, 52% are Local Authority maintained and purchase energy from the City Council and are therefore captured within scope 3 of Coventry City Council's annual greenhouse gas emissions report. Local Authority Maintained schools account for 9% of Council emissions. Schools are included in the government's current target to reduce the emissions from Public Sector buildings by 50% (2032) and 75% (2037) compared to a 2017 baseline.
- 9.5.3 All future re-build programmes will need to be designed to a high standard of energy efficiency and be net zero in operation. They will be required to be designed to adapt to a changing climate. For example, any new school building designs should prepare for and mitigate against the effects of climate change, including measures to reduce surface water run off because of flooding, and reducing any negative effects on the local community and environmental infrastructure. Opportunities should be identified to create green space, sustainable urban drainage and enhance biodiversity. Designs should consider measures for thermal cooling to ensure new buildings can cope with more extreme temperatures alongside making provision for outdoor shade.
- 9.5.4 Opportunities should be identified to improve the energy efficiency and climate resilience of existing buildings as part of any planned refurbishment. As part of this consideration should be given to using the capital programme to leverage additional grant funding to support decarbonisation projects on existing schools, such as the Public Sector Decarbonisation Scheme 3b that is supporting the delivery of measures to upgrade heating systems and install renewable energy across some schools in 2024-25. The Council's SEP with E.ON will endeavour to support this programme through seeking to introduce more solar PV and Air Source Heat Pumps across Coventry schools.
- 9.5.5 As part of the DFE's Sustainability and Climate Change Strategy, all schools will need to report their carbon emissions and set and monitor against targets for carbon reduction. To support this, future cost benefit analysis will need to incorporate the environmental and socio-economic costs of the impacts of carbon emissions and consider climate resilience and adaptation.

9.6 Implications for partner organisations?

Planning for additional specialist places will require close partnership working with Health, Social Care and other relevant organisations to enable multi-agency support and provision for children with SEND to be made.

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Coventry City Council

Education One Strategic Plan 2025 - 2029

PHOTOS

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1. Introduction

1.1. Statutory Context

Coventry City Council (CCC) has a legal duty under Section 14 of the Education Act 1996 to ensure the provision of sufficient school places for children of compulsory school age. These places must be sufficient in character, number and equipment to ensure all pupils have the opportunity for appropriate education: appropriate education means instruction and training that is desirable in view of the pupil's age, ability, aptitude, and the length of time they are expected to remain at school. It is CCC's role to plan, commission, and organise school places in a way that raises standards, manages supply and demand, and creates a diverse infrastructure. CCC can meet its duty by:

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

In managing the supply and demand of school places; in order to allow for flexibility in the system to meet parental preference, enable in-year transfers and support families moving to an area to find a place for each of their children at the same school where appropriate, the target for CCC is for the supply of places to exceed demand by at least 2% with as even a spread across the city as possible; the Department for Education (DfE) recommends that local authorities maintain no more than 5% surplus of places within a specified area.

1.2. Coventry's Education One Strategic Plan

The One Strategic Plan for Education will help schools, parents, council staff, local partners and stakeholders understand how CCC plans to work towards these priorities to ensure that all children and young people thrive in Coventry schools and settings throughout their education, wherever they live.

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

2. Funding

The following section examines the different sources through which funding can be received for provision of additional school places such as grant through the DfE, or by requesting contributions from new housing developments.

- **Basic Need Grant funding**

Capital allocations to meet projected shortfalls in provision are provided by the DfE to all local authorities based on the data provided in the annual School Capacity return (SCAP). The level of funding is determined by the demand for school places in the city.

In Spring 2025 there was a 2-year basic need allocation. The allocation for Coventry totalled £97,657,978 across the 2-year settlement and was the highest allocation in the Country.

Year of Allocation	£
Basic need funding received up to 25/26 entry	£82,724,761
26/27 entry (announced Spring 2025)	£59,755,756
27/28 entry (announced Spring 2025)	£37,902,222
28/29 entry (due to be announced Spring 2027).	
Grand Total	£180,382,739

- **Early Years Capital Funding**

CCC received £530,241 Childcare Expansion Capital Grant funding in year 2023-2024 from the DfE to support the provision of new places to support the expansion of 30-hours entitlement places for children 9 months to 3 years old and wraparound provision for primary school aged children. CCC has allocated this funding to 9 providers which includes Private Voluntary and Independent (PVI) childcare providers, childminders and schools to develop expanded entitlement and wraparound places. The grant agreements are currently being finalised before the funds are distributed to the providers in line with the recommendations made in the most recent Childcare Sufficiency Assessment.

In addition, in October 2024, the DFE launched the School Based Nurseries Programme, enabling state funded primary schools to access up to £150,000 in capital funding to create or expand nursery provision. Funding has been confirmed for 2024-2025 and 2025-2026, with a third phase announced. Stoke Primary School has successfully secured phase one funding, further rounds of funding are anticipated to be announced in April 2026.

- **Special Provision Fund and High Needs Fund (2018 – 2025)**

In October 2021 the government announced that it was supporting local authorities with High Needs Capital Funding, as a continuation of Special Provision Fund, to enable Local Authorities to deliver new places and improve existing provision for children and young people with Special Educational Needs (SEND). The financial allocation for 2025 was announced in March 2025 and formed part of the national £740 million of capital investment in 2025-26, to support children and young people with SEND or who require alternative provision (AP) as part of the broader capital settlement.

In March 2025, CCC received an allocation of £5,160,168. In total CCC has received £30,517,548 in funding through this mechanism over the past 6 years. This funding has been used to deliver additional school places at Woodfield Special School, Sherbourne Fields School, Tiverton School, and Baginton Fields Academy.

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

There is an expectation that when the predicted impact of a new housing development creates a shortfall of places this will be funded through S106 contributions towards the following: providing additional education provision, expansion of existing schools, opening of new schools. The DfE expect the infrastructure required because of housing developments to be mitigated by S106 funding/CIL funding.

Where a housing development yields significant numbers of pupils and justifies new provision it may be necessary to secure land. The land would be used for education purposes to safeguard CCC's statutory responsibility to provide sufficient school places. Contributions are requested fairly based on their proximity to the development. All education types are considered and some rounding within the pupil yield calculation may see an additional place be requested when rounded up to the nearest whole pupil place.¹

Other funding sources:

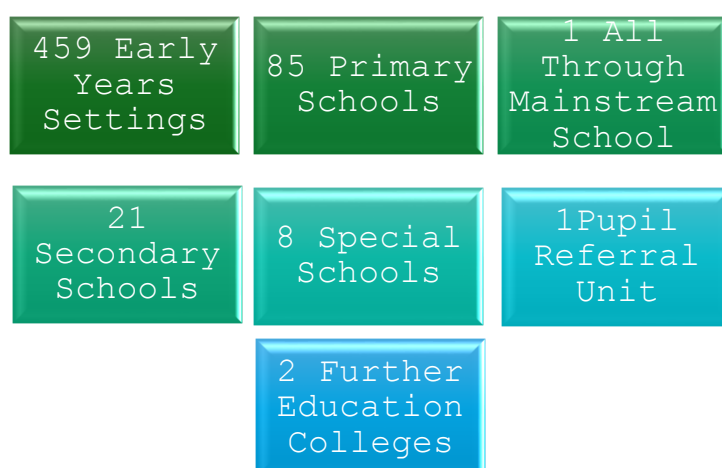
¹ The methodology for the pupil yield calculation is included in appendix 3.

- Centrally funded schools via the Government's School Rebuild programme. Coventry has a number of schools which are being rebuilt under this scheme, namely – West Coventry Academy, Bishop Ullathorne, Coundon Court, Cardinal Newman, Foxford Academy, Spon Gate, Limbrick Wood; Coventry will work collaboratively with the DfE to progress these projects.
- Capital Receipts – the sale of former education settings deemed surplus to requirements can be ring fenced to education in exceptional circumstances.
- Capital contributions from individual school budgets and/or bids by Academies for 'Capital Infrastructure Funding' (CIF).
- Capital funding allocations for 'Voluntary Aided' schools (LCVAP funding).

3. Coventry Context

Coventry is the ninth largest city in England and the twelfth largest in the United Kingdom, with a population of 360,700 as of the mid-year population estimates, making it the second largest Local Authority in the West Midlands.

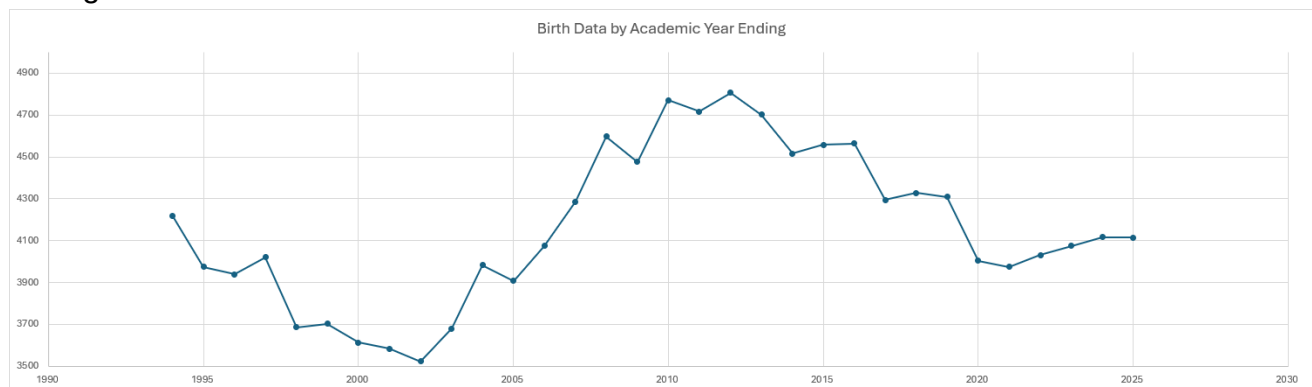
According to the 2023 mid-year population estimates, just over one-fifth (22.3%) of the city's population are children and young people aged under 18, 63.6% are of working-age (18-64), and the remaining 14.1% are aged 65 and over. The city has the following education provision within Coventry:



The graph below shows the birth rate across Coventry, with 2021 to 2025 showcasing a gradual increase of the birth rate, increasing slightly each year, in comparison to the previous decline between 2010 and 2020. Given the transient nature of the city's population and the

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social mobility of its residents, updates to birth and GP registration data will occur quarterly through the NHS Foundation Trust.



The latest data gives us some key headlines:

- The birth cohort peaked for entry into Reception in September 2016
- The current Year 5 cohort (the cohort born between September 2015 and August 2016) is the largest across Coventry Primary Schools and is projected to transition to secondary school in September 2027, placing significant pressure on secondary capacity. Strategic planning is underway to mitigate the impact on place availability and ensure sufficient provision for this cohort.

In recent academic years, CCC has experienced a sustained increase in in-year school applications, driven largely by migration into the city. This period of heightened demand resulted in significant pressure on school capacity, with a number of schools operating at or above the published admission number (PAN). The impact was most pronounced in the primary schools, where increased in-year movement reduced available capacity across several year groups.

Primary School	Total Applications Made	Secondary School	Total Applications Made
01/09/2018 - 31/08/2019	1255	01/09/2018 - 31/08/2019	1267
01/09/2019 - 31/08/2020	1454	01/09/2019 - 31/08/2020	1117
01/09/2020 - 31/08/2021	2243	01/09/2020 - 31/08/2021	1399
01/09/2021 - 31/08/2022	3124	01/09/2021 - 31/08/2022	1794
01/09/2022 - 31/08/2023	3056	01/09/2022 - 31/08/2023	1878
01/09/2023 - 31/08/2024	2533	01/09/2023 - 31/08/2024	1652
01/09/2024-31/08/2025	2111	01/09/2024-31/08/2025	1484

Analysis of the data provided in the table above depicts that in-year applications have begun to stabilise at a lower level. This reduction has eased immediate pressure on some schools; however, capacity constraints remain in specific cohorts.

Despite the reduction in school applications last year, supply pressure persists in some primary year groups, particularly Years 3, 5 and 6, where capacity remains below 2%. As a result, some schools continue to operate close to or above PAN. Primary school sufficiency is therefore under active monitoring to ensure that existing provision remains aligned with demand and that localised pressures can be addressed promptly.

These capacity pressures are also beginning to impact the secondary schools; demand is exceeding earlier projections. In addition, the larger primary cohorts admitted during the peak years are expected to progress into Year 7 over the coming years, placing further pressure on secondary school capacity.

Strategic planning is currently focused on limited small-scale intervention in the primary phase of education to support localised pressure and supporting cohort progression into secondary schools, where larger additional capacity is being planned to meet projected demand. This targeted approach ensures continuity of provision while maintaining flexibility to respond to future changes in demand.

4. Providing School Places

There are two consistent methods for providing additional school places, through either expansions of existing schools or the delivery of new schools.

- **School expansions**

Where a predicted shortfall of places has been identified the first option explored is to expand an existing school. Education Capital Strategy will consult with all schools and decide upon the most cost-effective way forward (after considering expansion opportunities available within various school sites and costs).

- **New schools**

The need for new schools often arises when there are no opportunities to expand existing local schools, or where new housing developments are expected to bring large numbers of new families to an area, or where no existing provision can accommodate additional pupils within the city. Education will determine suitable sites based on location of need, i.e. where

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pupil numbers are growing rapidly, and the size of the land to ensure it is of sufficient size to accommodate the proposed number of new pupils. The land size has to be compliant with the Building Bulletin 103 (BB103) and Building Bulletin 104 (BB104) guidelines² for new schools.

There is a presumption in law that when the need to establish a new school arises these schools will be Free Schools. The role of the local authority is to identify a site for the school and to seek applications to run the new school from potential sponsors. CCC intends to work collaboratively with the DfE, the Regional Schools Commissioner, and other external providers as new school(s) are required. The *Childrens Wellbeing and Schools Bill* is proposing to change this, removing the presumption that new schools will be opened as academies and instead allowing proposals for all types of new schools, including allowing local authorities to propose their own new school.

5. Early Years

The Early Years sector in Coventry is committed to its own robust assessment of local needs through a dedicated Early Years Childcare Sufficiency Assessment (CSA). This work underpins the **Coventry Integrated Early Years Strategy**, which outlines a citywide focus on improving outcomes for children aged 0–5. The Strategy not only supports the development of educational, health, and wellbeing outcomes but also aligns with national priorities such as the *Start for Life* programme and the expansion of early education entitlements.

You can find more information in the [Early Years Sufficiency Assessment](#) and [Coventry Early Years strategy 2025 to 2028](#).

Context and Purpose

Analysis of ward-level data highlights uneven demand and capacity across Early Years settings, nursery classes, childminders and wraparound provision. Several wards are operating at very high levels of utilisation (90–100%), indicating pressure on parental choice, system resilience, and the ability to respond to growth in demand. This strategy sets out a targeted approach to explore and develop options in areas of highest pressure, while maintaining sufficiency across the wider system. Sufficiency is calculated at ward level and take up rates will vary depending upon the demographic of the local community.

² BB103 provides area guidelines for mainstream schools in the UK, covering buildings and sites for all age ranges from 3 to 19. BB104 provides area guidelines for school buildings and sites, particularly for special schools and alternative provision.

Key Pressure Points

The data shows consistent and acute pressure in the following areas:

- **Early Years Settings:** In Bablake (97%), St Michaels (94%), Sherbourne (91%), Wainbody (89%) and Wyken (84%), suggesting limited flexibility for new demand.
- **Nursery Classes:** In Wainbody (100%), Upper Stoke (98%), Bablake (97%), Lower Stoke (93%) and Foleshill (90%). There is an existing project in the Upper Stoke ward which will reduce the pressure on this area.
- **Registered Childminders:** In Cheylesmore (100%), Longford (100%), Earlsdon (97%) and Holbrook (87%), alongside low availability in Foleshill (17%).
- **Out-of-School / Breakfast Clubs:** In Holbrook (98%), Lower Stoke (85%), Upper Stoke (83%), Whoberley (82%) and Sherbourne (80%).

% of filled places	Early Years Settings	Nursery Classes	Nursery Unit at Independent Schools	Registered Childminders	Schools with out of school/breakfast club
Bablake Ward	97%	97%	75%	53%	73%
Binley and Willenhall Ward	72%	75%		48%	58%
Cheylesmore Ward	81%	64%		100%	79%
Earlsdon Ward	83%	50%	50%	97%	70%
Foleshill Ward	65%	90%	66%	17%	74%
Henley Ward	72%	82%		56%	62%
Holbrook Ward	75%	76%		87%	98%
Longford Ward	69%	81%		100%	68%
Lower Stoke	77%	93%	65%	75%	85%
Radford Ward	73%	78%		59%	52%
St Michaels Ward	94%	84%		55%	60%
Sherbourne Ward	91%	69%		59%	80%
Upper Stoke*	60%	98%		88%	83%
Wainbody Ward	89%	100%		50%	53%
Westwood Ward	72%	81%		55%	65%
Whoberley Ward	69%	84%		64%	82%
Woodlands Ward	73%	74%		43%	68%
Wyken Ward	84%	85%		64%	70%

Strategic Priorities

Contingent on early years capital funding being received by CCC, places would be added for the following reasons.

Focused Place-Based Exploration

Priority support and capital funding would be utilised in wards where multiple provision types exceed 85–90% utilisation, including Bablake, Wainbody, Upper Stoke, Lower Stoke, St Michaels, Holbrook and Cheylesmore. In these areas, the Early Years team will explore:

- Expansion potential within existing settings
- Opportunities for new provision aligned to local demand
- Better balance between maintained, private, voluntary and independent providers

Strengthening Nursery and School-Led Solutions

High pressure in nursery classes suggests limited capacity within schools. Options to explore include:

- Expanding nursery classes where space allows
- Developing nursery units within schools currently without early years provision
- Encouraging schools in high wraparound demand areas to extend breakfast and after-school offers
- Hollyfast Primary school (Sherbourne Ward) and Keresley Grange Primary School (Bablake Ward) have expressed an interest in expanding the Early Years offer; CCC is supportive of developing these plans under the next phase of DfE School Based Nursery Funding.

Wraparound Provision Expansion

High demand for out-of-school and breakfast clubs requires collaboration with schools, particularly in Holbrook, Lower Stoke, Upper Stoke and Whoberley. CCC will explore:

- Feasibility of extending existing clubs
- Partnership models with PVI providers and community organisations
- Capital or revenue support where lack of provision is a barrier

6. Primary Education

Demographic changes have altered the sufficiency position for both early years and reception school places in recent years. Historically, circa. 95% of pupils born within the city would go on to attend a Coventry primary school, with the remainder choosing to attending other Local Authority Schools, Private Education, or moving out of the Coventry local authority during pre-school age. However, in recent years an increasing number of pre-school children have attended a Coventry school. September 2023 being the first year in a 20-year tracking where the number of children attending a primary school was larger than the relevant birth cohort from 4 years previously. This trend is still being observed and increasing in the September 2025 reception entry. The main reason for this variation being the size of the reception cohort is larger due to in-year migration from families with pre-school children.

Year ending 31 st August of Births	Number of Births	Year of Entry to Primary School	Number of Children attending Coventry Primary School from 1 st September	% of birth cohort who attended primary school
2014	4517	2018	4337	96.0%
2015	4557	2019	4322	94.8%
2016	4564	2020	4303	94.3%
2017	4294	2021	4170	97.1%
2018	4327	2022	4298	99.3%
2019	4309	2023	4361	101.2%
2020	4004	2024	4299	107.4%
2021	3974	2025	4210	105.9%

CCC has taken a phased and responsive approach to primary school place planning over time:

- Phase One (from 2008) delivered a programme of permanent school expansions, introducing 37.3 forms of entry and creating 8,840 additional primary school places.
- Phase Two (from 2017) responded to declining birth rates in certain areas of the city. This led to a re-evaluation of PAN, with reductions implemented at a number of schools where pupils were falling, to ensure provision remained sustainable and aligned with demand.

School	PAN reduction information
Alderman's Green	Reduced from 90 to 60 in Sept 2020
Coundon Primary	Reduced from 90 to 60 in Sept 2021
Frederick Bird	Reduced from 120 to 90 in Sept 2021
Hill Farm	Reduced from 90 to 60 in Sept 2022
John Gulson	Reduced from 90 to 60 in Sept 2020
Little Heath	Reduced from 60 to 30 in Sept 2017
Richard Lee	Reduced from 90 to 60 in Sept 2018
Spon Gate	Reduced from 60 to 30 in Sept 2018
St Bartholomew's	Reduced from 60 to 30 in Sept 2018

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From 2022 onwards, increasing in-year migration led to renewed pressure across multiple primary year groups. This has been particularly evident in Years 3,5 and 6, where cohort sizes have grown as pupil moved through.

To manage this demand, CCC adopted a flexible and targeted approach including:

- Working in partnership with schools to introduce temporary bulge classes, typically for a single year group, with the cohort progressing through the school until Year 6.
- Applied the Fair Access Protocol where appropriate, to ensure children could be placed quickly and fairly in specific circumstances.

This strategy allowed CCC to respond to short- and medium-term pressures while avoiding over-expansion in areas where demand is changeable.

The current position shows that in-year application levels have begun to stabilise, following the significant growth seen in previous years. While this has eased immediate pressure in some areas, the impact of earlier migration continues to challenge sufficiency as larger cohorts move through the primary phase.

As a result, primary school sufficiency remains under close review at cohort and local area level. The current strategy is focused on:

- Consolidating existing provision rather than creating new permanent capacity.
- Continuing to use temporary expansion space where additional places are required.
- Ensuring that capacity decisions do not create long-term surplus places should demand reduce in future years.

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

CCC is exploring options with Keresley Grange Primary School to increase places in the North of the city by adding an extra 105 places across all year groups. The driver for this proposed expansion is new housing at the Keresley Urban Expansion, and housing at the former Meggitt's Factory on Holbrook Lane. CCC intend to open a new school on the Keresley housing site as part of the Local Plan; however, demand is not yet sufficient to justify opening the new school, but the pressure is of a nature that it does require additional capacity to be

added in. Expansion at Kerley Grange will increase the schools capacity from 1.5 to 2 forms of entry (FE).

In 2018, a planning application was submitted for a significant housing development as part of the Eastern Green Sustainable Urban Extension. All 3,300 homes have now been approved; CCC has secured land to allow building of (up to) a 3FE Primary School. The neighbouring schools are St Andrews Infant and Eastern Green Junior, the only remaining infant and junior schools within the city. This housing development provides the opportunity for both to schools to extend their age ranges to become all-through Primary Schools. CCC would look to move St Andrews from its current site to the new location, extending to a full Reception to Year 6 cohort. Eastern Green Junior would expand their current provision to a full Reception to Year 6 cohort on its current school site, with investment required. This would be in line with the proposed buildout rate of the housing development; the anticipated timeline is currently by 2030 but will be continuously reviewed as set out above.

7. Secondary Education

Since September 2018, additional capacity has been added in Secondary schools to provide for the larger birth cohorts identified through the pupil forecasts through phases. As agreed at Coventry Education Partnership meetings, the plan has been to deliver and adopt a model of both permanent and temporary expansions to ensure sufficiency of places, current and future viability for schools, and cost efficiency.

As set out in Section 6 the increase of in-year migration (between 2023 and 2025) has increased the number of pupils attending Coventry primary schools, which is impacting on secondary sufficiency when the relevant cohort moves to year 7. As a result of this primary cohorts are larger than previously forecast, meaning more year 6 pupils have been applying for year 7 school places. To respond to this, CCC has adopted the following strategy:

- Working in partnership with schools to either re-utilise former bulge (temporary) classes as part of the One Strategic Plan 2018-2024 or introduce new bulge (temporary) classes.
- The challenges of creating in-year bulge classes within secondary schools, and the difficulties this has created for timetabling and recruitment, has highlighted the need to ensure that available spaces are created at the year of entry and offered through co-ordinated scheme.

Phase One

Between 2018 to 2021 544 additional Year 7 places were created through a combination of temporary and permanent expansions across existing secondary schools in Coventry.

Phase Two

Between 2022 to 2024 the focus was on addressing the projected shortfall of school places through the creation of additional temporary places and bulge classes. This was done to ensure sufficient surplus places across the city. For 2024, plans were adjusted (from 6FE to 10FE) in response to the rise in in-year applications. During this period, 810 additional places were created across 11 secondary schools in Coventry.

Phase Three

Between 2024 and 2027 additional places are required responding to the increase in in-year applications. Due to the more transient nature of phase three this will continue to be reviewed annually in line with the updated pupil forecasts, and the expansion plan may be altered accordingly.

- In total 5 permanent additional classes and 2 temporary additional classes were added for 2025 with a total of 193 Year 7 places added.
- In September 2026, 1 additional Year 7 class has been agreed in addition to the above. This is at Eden Girls School.
- In September 2027, 4 additional Year 7 classes will be needed in addition to the above. These places have been agreed at Blue Coat, President Kennedy, Cardinal Wiseman, and Westwood Academy, projects are in a design stage to add the necessary capacity to these schools.

The capacity added in 2027 should provide sufficiency until 2030, however this will be monitored annually and plans revised accordingly to either add or remove places as required to keep a fair division of surplus places across the city.

8. Special Educational Needs Provision

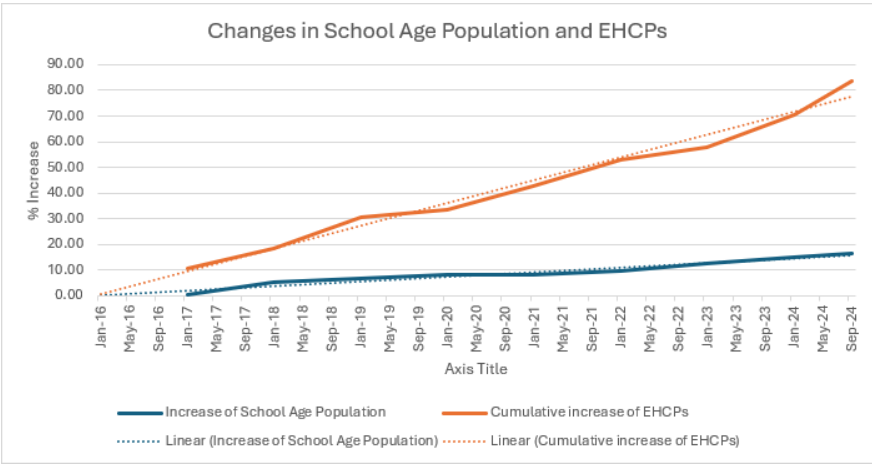
Over the past decade, demand for Education, Health and Care Plans (EHCPs) has risen steeply, far outpacing demographic mainstream growth. This trend is projected to continue, creating significant pressure on specialist school capacity, mainstream inclusion, post-16 pathways, and the High Needs Block (HNB) budget.

Changes within the SEND system have been formally acknowledged since 2019 and the publication of the Education Select Committee's report on SEND, which concluded that

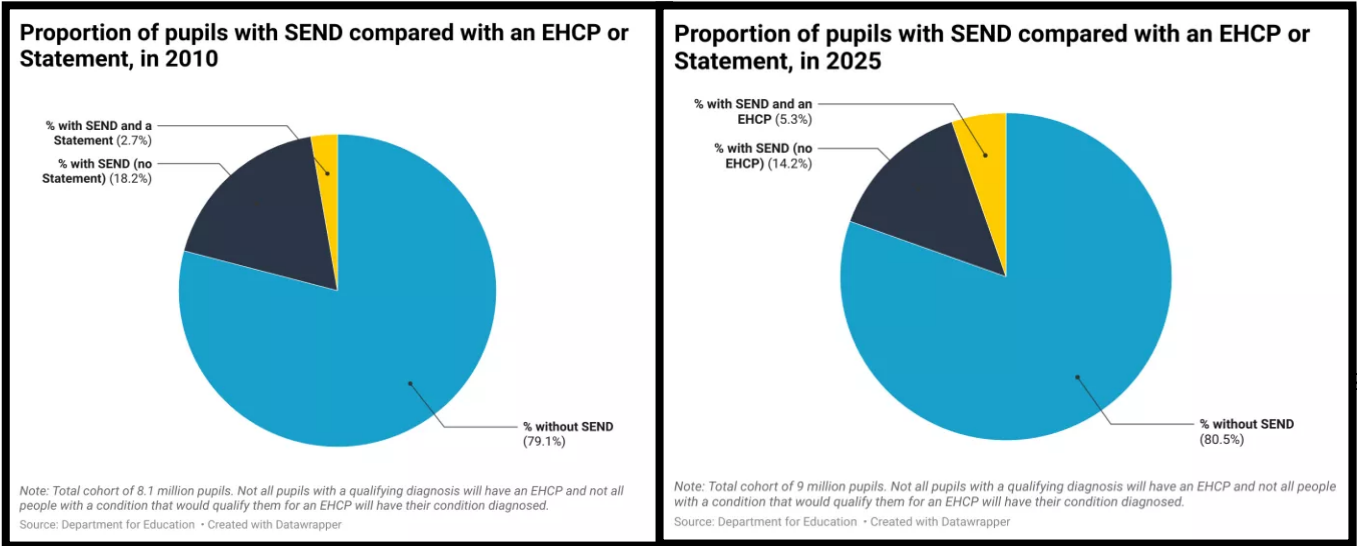
immediate action was required by the Department for Education to secure the feasibility of the national SEND system.

In 2023, a SEND and AP Improvement Plan (2023–2024) was published by the then Conservative government. The Improvement Plan sought to secure a sufficiency of provision for children with SEND by introducing National Standards and inclusion pathways, improved accountability mechanisms, and changes to EHCP processes. These reforms were partially implemented, but paused following the change of government in 2024, pending the publication of a SEND white paper, scheduled for early 2026.

Since 2015, there has been a significant increase in the number of children with SEND whose needs require support to be coordinated through an EHC Plan. This has been evident in Coventry and throughout the UK.



Figures 1 and 2 below show changes in the overall proportion of children nationally with SEND and the proportion of these who have an EHC Plan. These figures illustrate the disproportionate growth in EHC Plans relative to the SEND and general school age populations.



As a result of the disproportionate growth of EHCPs, the demand for specialist placements has increased, exceeding forecasts based on birth rates. The SEND Transformation Strategy has highlighted the below actions:

- Ongoing support and training in the mainstream education workforce and the development of a capital investment, ensuring that mainstream schools are equipped and resourced to meet the needs of children with SEND through high-quality, inclusive, and flexible support.
- Increased number of enhanced resource provision (ERP) places in mainstream schools.
- Expand special school provision within the city, prioritising new places for children with the most complex SEND, so that more learners can access high-quality education locally.
- Establish a dedicated post-16 SEND partnership to increase both the number and diversity of placements available for young people with SEND after age 16, ensuring that all learners can access high-quality, appropriate pathways that support their aspirations and needs as they transition into adulthood.

Future need

Primary

Given the rising demand for EHCPs, the number of pupils in primary mainstream with additional needs has also increased. To meet the needs of these pupils, it is proposed to create resourced provision units on mainstream school sites making use of existing education assets. The following schools currently have ERPs:

School name	DfE number/URN	Phase
Alderman's Green Primary	2000	Primary
Aldermoor Farm Primary	2131	Primary
Blue Coat Secondary School	4800	Secondary
Courthouse Green Primary	2001	Primary
Hearsall Primary	2124	Primary
Little Heath Primary	3435	Primary
President Kennedy	6906	Secondary
Stoke Park School	4033	Secondary
Whittle Primary	2017	Primary

Table of Schools with ERP

CCC has developed a model of provision based on best practice and experience. This best practice states that resource provisions can accommodate up to 10 learners in primary on a mainstream school site (either maintained or academy). However, this is a variable depending on the type of provision being provided.

It is anticipated that 3 primary resource provisions per year will be required over the planned period assuming a population of 10 pupils per provision. For the 2026 academic year these are planned and in construction at; John Shelton, Pearl Hyde, and Henley Green Primary. Following the publication of the SEND white paper, plans will be developed for the next phase of ERPs opening in 2027.

Further expansion of special schools across the city is increasingly challenging due to the landlocked nature of many school sites, which limits the available space for new buildings or extensions. Despite these constraints, efforts are being made to continue to meet the growing demand for special educational needs (SEN) provision.

Secondary

Woodfield Special School (all-through school) is in the process of relocation and expansion at the former Woodlands site. This will create up to an additional 100 SEMH places across both primary and secondary phases. There will be a phased increase in places from September 2026.

Sherbourne Fields Special School has recently expanded to accommodate the larger primary cohort moving through to secondary phase.

Baginton Fields Academy expansion will provide up to an additional 74 additional places across the secondary phase of education for a wide range of pupils with an EHCP. This project is expected to be completed in 2027.

Due to the rising demand for specialist school placements, it is likely that further expansion of schools will be required. Consultation has been undertaken with Special School Headteachers to explore options to deliver extensions to their existing accommodation.

Blue Coat opened an ERP in September 2025, initially creating 7 places. This ERP will expand by circa. 7 pupils per year and will have a maximum capacity of 30.

Plans are underway to develop further secondary ERP's to create more specialist provision within mainstream education.

SEND Post 16

The number of post-16 learners with EHCPs is projected to increase by over 60% between 2026 and 2031. Post-16 provision in special schools is expected to grow by a similar

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proportion, driven by larger secondary cohorts moving into post-16 education and limited progression into alternative pathways at the end of Year 11.

This pattern is reinforced by provider-level data within the further education sector, which shows continued and accelerating growth in demand across Coventry College, Hereward College, adult education, and alternative and out-of-school provision. Overall demand across these providers is projected to increase substantially by 2031. This reflects rising EHCP demand alongside ongoing capacity constraints within specialist school settings. Work is underway to assess and understand the impact and necessary actions required to respond to this trend.

9. Additional capital funded works

Education capital spending focuses on improving and maintaining the physical school estate so that it supports safe, inclusive, and effective learning. Investment decisions are guided by long-term need, ensuring school buildings remain fit for purpose while responding to changing educational, environmental, and community requirements.

Energy investment supports the transition to more efficient and sustainable school buildings. The Education team has recently supported projects to deliver net-zero carbon at St Christopher Primary and Ravensdale Primary. Further work is underway to look at options for upgrading heating systems, improving insulation, installing energy-efficient lighting, and, where possible, incorporating renewable technologies. These works will aim to reduce carbon emissions, lower running costs, and create more comfortable learning environments, helping schools contribute to wider climate and sustainability goals.

The Strategic Energy Partnership (SEP) is currently developing proposals to roll out solar panels, plantroom insulation and BMS improvements across the school buildings in Coventry. The funding for this programme of work is still undecided but is likely to involve a power purchase agreement (PPA) rather than grant funding. The schools will also benefit from education engagement sessions via the SEP Social Value Fund.

Access works ensure that school buildings are accessible and usable for all pupils, staff, and visitors. This work removes physical barriers and improves movement around sites through measures such as ramps, lifts, accessible toilets, improved entrances, and safer external routes. Access projects also support compliance with equality legislation and help schools better meet the needs of learners with additional support requirements.

Suitability investment adapts buildings, so they align with modern teaching methods and curriculum needs. This can include reconfiguring spaces, upgrading specialist classrooms, improving ICT infrastructure, and creating flexible learning environments. Suitability projects help schools respond to changes in pupil numbers, curriculum delivery, and the way education is delivered, ensuring buildings actively support learning rather than constrain it.

Condition spending addresses the repair and replacement of aging or failing building elements to keep schools safe, operational, and resilient. This includes work on roofs, windows, electrical systems, plumbing, and structural components. By tackling condition issues early, capital investment reduces the risk of disruption, extends the life of school assets, and protects public investment in the education estate.

Appendices

Appendix 1 - Primary Planning Areas

Information available:

https://www.coventry.gov.uk/downloads/file/31710/primary_planning_areas

Appendix 2 – Secondary Planning Areas

Information available:

https://www.coventry.gov.uk/downloads/file/31711/secondary_planning_areas

Appendix 3 - Education Pupil Yield Methodology

CCC requests developer contributions through Section 106 agreements to support educational infrastructure impacted by new housing developments. The Coventry Local Plan 2011-2031 which is estimated to lead to over 13,200 additional children across all age ranges has followed a period of public examination and consultation on proposed modifications. There are also significant numbers of housing developments receiving planning outside the Local Plan process, which have already impacted on local schools. CCC do not request developer contributions on one-bedroom dwellings as they are unlikely to generate school pupils.

These contributions are determined by two main factors: the DfE's cost per pupil multiplier for Coventry and the pupil yield anticipated from the development. Contributions are sought for Early Years, Primary, Secondary, Sixth Form and SEND; ensuring they are aligned with government policies and local authority practices.

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

- Good value for money
- Ensure contributions requested align with CCC's One Strategic Plan and its ongoing programmes

- Select schools close to the development where possible, but must also factor in localised areas of pressure City wide
- All schools are selected equally and fairly

Cost Multiplier

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

- Children under two years: 3.5 m2 per child
- Two-year olds: 2.5 m2 per child
- Children aged three to five years: 2.3 m2 per child

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

The DfE provide an annual update to this figure and for 2025/2026 this figure is £19,288.30. The Secondary calculation has been updated by the DfE to a figure of £24,783.22. These new figures have been confirmed by the DfE and are expected to rise in the future in line with inflation. Therefore, the cost per pupil multiplier will be updated as and when the DfE provide the new allocation allowance for Coventry.

The DfE do not provide costs per pupil place for Sixth form pupils. Therefore, the methodology for this, takes the Secondary calculation and adds the additional floor space required for a sixth form pupil. The additional floor space required for a sixth form pupil over a secondary age pupil is a recognised DfE statistic. The basis behind these floor space calculations is the extra equipment and supervision that sixth form pupils require over secondary age pupils. The DfE state the additional floor space required be larger than that for Secondary and working this out as a percentage sixth form pupils require 30% more space than Secondary. Therefore, 30% has been added to the cost multiplier for Secondary to give a total for a single sixth form of £32,217.90

For SEND, as there is no DfE multiplier, Coventry uses the benchmarking mechanism undertaken by the DfE in 2023, which recommends that 'Special schools require more space per pupil than mainstream schools, and this should be reflected in the assumed costs of provision. Education Capital Strategy recommend that developer contributions for special or alternative school places are set at four times the cost of mainstream places, consistent with the space standards in Building Bulletin 104. There is also the National School Delivery Cost Benchmarking report for the costs of delivering SEN school places.' The DfE recommend for £96,806 average cost per pupil place for SEN, Coventry's cost per pupil multiplier has been updated to match this figure.

Pupil Yield

Early Years

The early years entitlements are:

- the 15 hours entitlement for eligible working parents of children from 9 months to 2 years old (new entitlement from 1 September 2024)
- the 15 hours entitlement for eligible working parents of 2-year-old children (new entitlement from 1 April 2024)
- the 15 hours entitlement for disadvantaged 2-year-olds
- the universal 15 hours entitlement for all 3 and 4-year-olds
- the additional 15 hours entitlement for eligible working parents of 3 and 4-year-olds

The entitlement hours are up to 15 hours of childcare a week over 38 weeks of the year (equivalent to a maximum of 570 hours a year), or, for 3 and 4-year-olds, up to 30 hours of childcare a week over 38 weeks of the year for qualifying children of working parents (equivalent to a maximum 1,140 hours a year).

From September 2025, eligible working parents of children aged 9 months and above will be able to access 30 hours (over 38 weeks a year) from the term following their child turning 9 months to when they start school.

Due to the extended entitlements the Early Years contribution request is calculated from asking for 2 years' worth 15 Hrs with the take up rate of funded 2 years and 3.3 years of 30 Hrs being added into this. This will be co-ordinated each year with Early Years colleagues to consider the take up rates.

Primary and Secondary

Coventry has seen an increase in the number of children requiring a school place in the city. This trend is expected to continue due to the new housing in the city. In essence more people within Coventry are having more children. The formula for this is by examining the total number of eligible homes within Coventry and the current Number on Roll in Schools, split between Primary and Secondary. This gives the pupil yield for how many school age children the current housing stock within Coventry provides. The pupil yield from a single eligible dwelling for primary is 0.38 and for secondary 0.32 pupils per eligible household.

Sixth Form

The formula for this is calculated from the proportion of children staying on in sixth form or in education between Years 12 and 13. However it is still an inconsistent indicator, therefore the percentage applied to the children staying on rate will be based on the stay on rate of children

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the September before the application was received. For the most recent year, the drop off between year 12 and year 13 was 8.9% of the cohort, therefore, to incorporate this into the pupil yield only 1.9 year groups are requested. This has resulted in a reduction in the sixth form contribution asked for.

Primary SEND

To calculate the primary SEND contribution, CCC use the school census (published three times annually). This lists the student details for the current mainstream and BSSS cohort and the number of children within this cohort with an EHCP. By understanding the total number of EHCPs within the current primary cohort, it is possible to calculate the current % of the cohort with additional needs arising from new housing. By dividing the figures of total cohort by number of EHCPs a total of 4.18% is received. This factor will be applied to the pupil yield calculation for primary. This figure will be updated annually as the number of EHCPs is rising in excess of proportionality of the general increase in population.

Secondary SEND

The Secondary SEND pupil yield is calculated using the same method of calculating the current number of secondary age pupils with an EHCP and dividing by the total amount of children in Secondary education. The current amount of EHCPs within Secondary school is 4.74%. This figure will be updated annually as the number of EHC plans is rising more than proportionality of the general increase in population.



Public report Cabinet

Scrutiny Coordination Committee
Cabinet

12 March 2026
17 March 2026

Name of Cabinet Member:

Cabinet Member for Public Health and Sport – Councillor K Caan

Director approving submission of the report:

Director of Care, Health and Housing

Ward(s) affected:

All

Title:

Coventry: City of Movement Strategy 2026-2031

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:

A co-produced joint Coventry: City of Movement Strategy has been developed, led internally by the Sport, Physical Activity and Wellbeing Team.

This new Strategy is intended to enable the City Council and its partners to progress further following the Coventry Sports Strategy 2014-2024 and the Physical Activity Framework 2019-2024, through creating a greater joined up system between health, sport, physical activity and movement with the concept of 'movement' at its core.

Over 70 organisations across Coventry were involved in the development of the strategy alongside a survey of residents that elicited 1398 responses gathering insight on local people's current movement habits, the barriers preventing them from being more active and their requirements which would contribute to making Coventry a City of Movement. This input was supplemented by public health data and insights along with the findings of other relevant needs assessments (Indoor Sports Facilities Strategy and Needs Assessment and the Playing Pitch and Outdoor Sport Strategy) to develop the following three strategic themes:

1. Active System: Connecting better
2. Active People: Movement for everyone
3. Active Place: A place of movement

An Equalities Impact Assessment (EIA) was also completed to assess the impact of the new Strategy on stakeholders, protected groups and service users. Based on the EIA, a positive impact has been identified for one or more groups.

Recommendations:

Scrutiny Coordination Committee is recommended to:

- 1) Support the strategic direction outlined in the presentation.
- 2) Provide recommendations to the Cabinet Member for Public Health and Sport to review in respect of how the strategy is progressed / delivered.

Cabinet is recommended to:

- 1) Approve the adoption of the Coventry: City of Movement Strategy attached as Appendix 1 to this report.
- 2) Delegate authority to the Director of Care, Health and Housing, following consultation with the Cabinet Member for Public Health and Sport, to take all necessary, incidental or ancillary actions deemed appropriate to proceed with the implementation of the Coventry: City of Movement Strategy.
- 3) Delegate authority to the Director of Care, Health and Housing, following consultation with the Cabinet Member for Public Health and Sport, to make variations as required to the City of Movement Strategy and associated place partnership Delivery Plan.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Coventry: City of Movement Strategy
Appendix 2 – Equalities Impact Assessment
Appendix 3 – Let's Talk Movement Report

Background papers:

None

Other useful documents:

[Coventry Sports Strategy 2014-2024](#)
[Physical Activity Framework 2019-2024](#)

[Coventry Indoor Sports Facilities Strategy 2025](#)
[Coventry Playing Pitch and Outdoor Sport Strategy 2023](#)
[Coventry Sport and Leisure Charter for people with disabilities](#)

Has it or will it be considered by Scrutiny?

Yes

Scrutiny Co-ordination Committee (Scruco) – 12 March 2026

The emerging Strategy was also taken to Scrutiny Board 5 in April 2025 to brief members on the Strategy's development and arising key themes.

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

No – although reports will be submitted to the Coventry Health and Wellbeing Board for ongoing monitoring, with updates on progress, at least annually.

Will this report go to Council?

No

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Report title: Coventry: City of Movement Strategy

1 Context (or background)

- 1.1. A co-produced joint Coventry: City of Movement Strategy has been developed, led by the Sport, Physical Activity and Wellbeing Team.
- 1.2. This new Strategy is intended to enable the City Council and its partners to progress further following the Coventry Sports Strategy 2014-2024 and the Physical Activity Framework 2019-2024, through creating a greater joined up system between health, sport, physical activity and movement with the concept of 'movement' at its core.
- 1.3. Significant progress has been made in Coventry as a result of the delivery of the previous strategies and as a result the City has much to be proud of. As a City we have:
 - ◀ Invested over £100m into sport and physical activity facilities
 - ◀ Invested into parks and green spaces to support physical activity in local communities
 - ◀ Coventry was awarded European City of Sport in 2019
 - ◀ Coventry City Council and CV Life developed and launched the Go CV card giving reach to over 130,000 people in the City
 - ◀ Coventry has also been identified as one of the 27 Place Partners set to benefit from a share of Sport England's place-based investment funding
- 1.4. We have also seen improvements in activity levels between 2018 and 2022 (2022 being the most recent data) through our household survey with a higher proportion of adults in Coventry participating in active travel. There is however more to be done, with those aged 35-54 being the most inactive age group and with children being more inactive than compared to England overall, but improving.
- 1.5. In order to ensure this new Strategy responds to the needs of the community, extensive engagement has taken place with over 70 organisations across Coventry involved in its development alongside a survey of residents that elicited 1398 responses gathering insight on local people's current movement habits, and the barriers preventing them from being more active which were primarily related to time, motivation and other commitments meaning people have limited time to participate in physical activity.
- 1.6. This input was supplemented by data and insights along with the findings of other relevant needs assessments (Indoor Sports Facilities Strategy and Needs Assessment and the Playing Pitch and Outdoor Sport Strategy) to develop the following three strategic themes for the City of Movement Strategy that have been supported by partners across the City and as an outcome of our work with Knight, Kavanagh and Page (KKP), a firm of consultants that have worked with us on the production of this and other sports strategies.

1.7 Active System: Connecting Better

1.8 Outcome(s): The system for movement, physical activity and sport in Coventry is cohesive: creating and sustaining the conditions within which sport and physical activity opportunity is universally promoted, understood, effectively delivered and sustainable.

1.9 What this means: Put simply, this means all agencies in the city being interested in promoting, delivering or assisting people to take part in movement and physical activity working well together to support our residents to be active and move more often. This is an opportunity to build on the solid foundations and strong partnerships created by the Coventry Sports Strategy 2014-2024, Coventry on the Move and Coventry's experiences as the UK City of Culture to be a leading national example of how physical activity, movement and sport can contribute to the health and wellbeing of its communities.

1.10 Active People: Movement for Everyone

1.11 Outcome: Increased engagement and participation in movement, physical activity and sport for all Coventry residents, in particular among people from its most deprived and vulnerable groups.

1.12 What this means: This Strategy aims to support the whole population in Coventry to be active. This means supporting all Coventry residents of all ages from all parts of the city to develop and maintain lifelong physical activity and sport habits. More accessible opportunities need to be provided for people who experience the greatest levels of inequality and/or who experience other significant barriers to access and need additional input and support.

1.13 Active Place: A Place of Movement

1.14 Outcome: Coventry residents are better connected to, and benefit from moving and being physically active in, built and outdoor environments.

1.15 What this means: Creating and sustaining places to be active in Coventry means ensuring that both natural and built environments are attractive, accessible, affordable and safe for all residents.

1.16 It also means engaging with communities in a way that reflects the fact that movement and activity needs to be wrapped around people's daily lives, in their homes, at work, in schools, in parks and playgrounds, at community centres, in faith settings - and embedded in the way in which people travel in and across the city.

1.17 Enabling better places for movement and physical activity is also about working with agencies outside or linked to the physical activity sector to create change. This includes the range of organisations representing the outdoor and natural environments.

- 1.18 In terms of the built environment, the continued growth of the city and development of regenerated housing estates creates opportunities to ensure that housing development is designed to enable and encourage movement and physical activity.

1.19 Evaluating impact

- 1.20 In line with the priorities of the City Council's One Coventry Plan, its health and wellbeing strategy and principles established by the Marmot approach, this Strategy will:

- ✦ Be evidenced based and data driven.
- ✦ Tackle inequalities via a collaborative approach, involving co-production.
- ✦ Use evaluation to demonstrate effectiveness and ensure continuous improvement.
- ✦ Listen to our residents and what matters to them.

- 1.21 Should the Strategy be approved, a mixed methods approach will be taken to the evaluation of Strategy themes and actions, emphasising the need for continuous learning, and the participation/co production with local residents.

- 1.22 Qualitative approaches, including case study / story telling development will be most appropriate to understand the impact on people and their experiences. Whereas quantitative data, such as the demographic profile use with Go CV and taking part in outreach activities, will also be collected to understand changes in activity where this is captured.

- 1.23 As an emerging Sport England place partnership area, the lead agencies in Coventry will adopt the National Evaluation and Learning Partnership (NELP) conditions for change listed below as part of their ongoing impact evaluation of this Strategy and across all place-based work.

- ✦ Process for Identifying the barriers and enablers of physical activity.
- ✦ Organisational policies, processes, and structures that enable place-based working.
- ✦ Capacity and capability across the workforce, volunteers and communities.
- ✦ Collaboration.
- ✦ Leadership.
- ✦ Community-led action.
- ✦ Cultures and practices for physical activity.
- ✦ Built and natural environments that enable physical activity.
- ✦ Cycles of learning and action.

2. Options considered and recommended proposal

2.1 Option 1 – Approve and adopt the Coventry: City of Movement Strategy (Recommended)

- 2.2 Based on the research undertaken, stakeholder / resident engagement, and alignment with the city's strategic goals, Cabinet is recommended to approve the Coventry: City of Movement Strategy.

- 2.3 Its implementation will contribute to a healthier, more active population, enhanced community engagement, and a sustainable sports, physical activity and movement infrastructure for future generations.
- 2.4 This Strategy will serve as a blueprint for the current and future development of sport, physical activity and movement initiatives, meeting the needs of the diverse Coventry population focussing on the whole life course.
- 2.5 During the development of the Strategy, Coventry was announced as one of 27 Place Partners set to benefit from Sport England's Place Expansion into communities with the greatest needs across England. The programme is designed to tackle inactivity and inequalities by making sport, physical activity and movement accessible for everyone. This Strategy will be used as an evidence base to inform all future place-based investment into the city, alongside local consultation in place.
- 2.6 This is a policy development that has been supported by over 70 stakeholders, including national partners such as Sport England. The development of a Strategy is recognised as good practice for local authorities across England to adopt and reinforces Sport England's Uniting the Movement Strategy at a local level.
- 2.7 The Strategy and its extensive engagement will be used to identify priorities to enhance existing physical activity provision, as well as supporting new provision to meet the identified needs of local people, creating more opportunities for movement.
- 2.8 The adoption of the Strategy will also support planning decisions and inform future Section 106 investments in the city, linked to key sites identified in the Coventry Indoor Sports Facilities Strategy and Playing Pitch and Outdoor Sports Strategy. The Coventry: City of Movement Strategy also enables infrastructure investment decisions to be locally led based on the priorities identified through public consultation for natural and built environments to make Coventry 'A Place of Movement'.
- 2.9 **Option 2 - To not adopt the Coventry: City of Movement Strategy (Not Recommended).**
- 2.10 If the Council chooses not to adopt the Strategy, this will go against national guidance and would not enable Coventry to plan strategically for future sport, physical activity and movement initiatives.
- 2.11 Not adopting the Strategy would also reduce the opportunity for potential funding from national partners, such as Sport England, as their investment would need to align to a citywide strategy. Therefore, it would reduce any potential future investment into place-based programmes for targeted physical activity interventions in areas of highest need, negatively impacting upon residents in these communities.
- 2.12 If the Strategy was not adopted, it would also impact on the 70 key stakeholder and other organisations within the voluntary sector that would use the strategic need and evidence base of the Strategy to underpin funding applications and local decision making.

3. Results of consultation undertaken

- 3.1. To deliver the Strategy, the Cabinet Member for Public Health and Sport instructed an independent consultancy to support the city partners to develop the Strategy. Knight, Kavannah and Page (KKP) were appointed to have a significant number of consultations with stakeholders across the city.
- 3.2. The Strategy is the result of an extensive research and consultation process which included direct engagement with over 70 stakeholders representing the NHS, schools, the voluntary sector, representatives from higher and further education (HE/FE), officers from Coventry City Council (CCC), public leisure facilities operator CV Life, Think Active (the active partnership for Coventry, Solihull, and Warwickshire) and the Positive Youth Foundation (PYF).
- 3.3. Our Public Health team supported the Strategy's development process by obtaining insight data from the Active Lives Survey and Coventry Household Survey.
- 3.4. A series of consultation workshops took place during 2025 with key stakeholders at both an operational and strategic level, bringing together representatives mentioned above to understand citywide priorities. The first two workshops consulted stakeholders to understand citywide priorities, whilst the second set of workshops presented the first iteration of the Strategy to test the concepts and language before refining the Strategy further.
- 3.5. In addition, the Strategy's findings and suggested actions were further informed by a significant public consultation process via a resident survey ([Lets Talk Movement](#) - LTM). The survey, which was commissioned by CCC, gained 1,398 responses.
- 3.6. The public consultation process involved the following engagement:
- 3.7. Online / email engagement that was undertaken:
 - ✦ Launch video with Councillor Kamran Caan – Facebook, Instagram and Tik Tok.
 - ✦ Two additional videos on Facebook, Instagram and Tik Tok.
 - ✦ Council intranet – posted on round-up three times, with a banner up for two weeks.
 - ✦ Gov Delivery email with survey link to Go CV (twice), Your Coventry, Let's Talk and Sport databases.
 - ✦ Emails sent to over 200 voluntary, community and special interest groups in the city, including information about the survey and a link to it, with a request to share with their audiences.
- 3.8. Partners involvement:
 - ✦ Sent toolkit with posters, social media and email examples.
 - ✦ Shared on their social media channels and to groups and their networks.
 - ✦ Supported their own groups to complete the survey.

3.9. Outreach work:

- ✦ Outreach was focussed on non-traditional space where people may not be active.
- ✦ EnV Coventry volunteers carried out 15 outreach sessions at various locations in the city, supporting residents with completing the survey.
- ✦ Outreach sessions at the Coventry City Football Club FanZone at two home fixtures. Alongside this there was information in the matchday programme and on the scoreboard.
- ✦ Posters and information were delivered to all Coventry Libraries and Family Hubs, in addition to other community buildings.
- ✦ Information on screens at Council buildings and at the Coventry Building Society Arena.

3.10. The overall response rate included 2,800 people who were aware (landed on the LTM survey page), 1,700 were informed (watched a video/read a document) and 1,398 were engaged (completed a survey). 1,398 responses were received.

4. **Timetable for implementing this decision**

- 4.1. Subject to approval of the recommendations contained within this report, the Strategy will be adopted as a policy of the City Council with immediate effect.
- 4.2. The subsequent implementation of the Strategy will be managed and reviewed by the Coventry Strategy Core Group – with regular updates to the relevant Cabinet Member(s) and oversight through the Coventry Health and Wellbeing Board.

5. **Comments from Director of Finance and Resources and Director of Law, Governance and Safer Communities**

5.1. Financial Implications

- 5.1.1 There are no financial implications within this report. The Strategy provides a strategic framework under which a more joined up system between health, sport, physical activity and movement can be created. The Council will work with multiple external partners to utilise various funding sources for investments and improvements related to the Strategy and will report back to the Cabinet Member on the development of these.

5.2. Legal Implications

- 5.2.1 Section 19 of the Local Government (Miscellaneous Provisions) Act 1976 gives the Council the statutory power, but not duty, to provide such recreational facilities as it thinks fit, including indoor and outdoor sports facilities.
- 5.2.2 Legal implications will arise from the delivery of the Strategy and Action Plan, including under public procurement, subsidy regime, GDPR, Health and Safety, property, planning and highways legislation. Appropriate legal advice will be provided at the relevant time as needed.

- 5.2.3 As the Strategy will involve children and vulnerable adults, there is a requirement to comply with the Children's Act 2004, Working Together to Safeguard Children and the Care Act 2014.

6 Other implications

6.1 How will this contribute to the [One Coventry Plan](#)?

- 6.1.1 Improving outcomes and tackling inequalities within our communities – The commitment to supporting the role of sport, physical activity and movement as a preventative measure for ill-health and to improve health outcomes.
- 6.1.2 Improving the economic prosperity of the city and regions – The Strategy supports the need for investment into the city's areas of highest need. Targeted interventions linked to the evidence base within the Strategy will contribute to tackling inequalities by making physical activity more accessible to residents who live in an economically disadvantaged area. The use of events will also play a part in helping improve economic prosperity as the city has developed a significant approach to major events that not only support the economic impact but also the social impact.
- 6.1.3 Tackling the causes and consequences of climate change – One of the three core themes within the Strategy is a priority to make Coventry an active place. Local partners in the city and wider West Midlands region (including the West Midlands Combined Authority – WMCA) are committed to both adults and children having a positive experience outdoors. This is illustrated by the aims to offer:
- ✦ More accessible, welcoming and safe community spaces.
 - ✦ Greater availability of green, grey and blue local spaces of the highest quality.
 - ✦ Outdoor community events in/at walkable environments.
 - ✦ More and improved access to walking, cycling, and active travel by creating the optimum environmental and social conditions to enable this to happen.
- 6.1.4 Continued financial sustainability of the Council – The Strategy will increase opportunities to secure grant funding (such as Sport England's Place Expansion investment) that aims to tackle stubborn inequalities and barriers to physical activity in areas of the highest need. It will also help in terms of the localised approach with communities and the need to have a joined up cross policy / Council services approach.
- 6.1.5 Council's role as a partner, enabler and leader – The Council has led on the development of the Strategy, in partnership with the Strategy Core Group, which has brought together over 70 organisations from a range of sectors and will lead on the delivery of the Strategy and place based expansion as we take a leadership and enabling role in the development of the place partnership.

6.2 How is risk being managed?

- 6.2.1 Risk associated with this Strategy will be managed through the Strategy Core Group (which will evolve to include more partners/stakeholders), who will continue to work with national and local partners to monitor and evaluate the progress of the Strategy against its themes and actions.
- 6.2.2 Regular briefings with the Cabinet Member for Public Health and Sport will allow for updates and progress reports to assist with managing any risk. This will also include regular reporting into the Health and Wellbeing Board and Scrutiny Board in terms of progress on the delivery.

6.3. What is the impact on the organisation?

- 6.3.1 None

6.4 Equalities / EIA

- 6.4.1 An EIA has been completed to assess the impact of the Strategy on stakeholders, protected groups and service users and is attached as Appendix 2. Based on the EIA, a positive impact has been identified for one or more groups.
- 6.4.2 The Disability Equality Action Partnership (DEAP) will also continue to be briefed and consulted (ongoing) as part of the Strategy implementation process to improve access and experiences of sport, physical activity and movement for people living with disabilities and long-term illnesses. The DEAP will also be a key driver to deliver the leisure charter that supports the agenda on Sport, Physical Activity and Movement.
- 6.4.3 As the Council progresses projects and/or schemes aligned to the Strategy, further EIAs will be undertaken and developed for each individual proposal, alongside any associated business planning. The Core Strategy Group, which will be developed, will also support the delivery of any EIAs as part of any planned developments.

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

- 6.5.1 As stated above one of the three core themes within the Strategy is a priority to make Coventry an active place. This can have a positive impact on the environment through:
 - ✦ More accessible, welcoming and safe community spaces.
 - ✦ Increased and more equitable availability of green, grey and blue local spaces of the highest quality for people and nature.
 - ✦ Outdoor community events in/at walkable environments across the City.
 - ✦ More and improved access to walking, cycling, and active travel by creating the optimum environmental and social conditions to enable this to happen.

6.6 Implications for partner organisations?

- 6.6.1 In partnership with the Council, local partners and stakeholders representing the NHS, schools, the voluntary sector, representatives from higher and further education, public

leisure operators, the Active Partnership and the Coventry Youth Partnership, will be guided by the Strategy to inform their focus and priorities for future interventions.

6.6.2 The Strategy's development has also been supported by Sport England National Lottery Funds and they continue to be a key stakeholder for the place expansion programme.

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Coventry: City of ***Movement*** Strategy



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With Thanks to Knight, Kavanagh and Page (KKP) for its independent consultancy support to help Coventry produce the Coventry City of Movement strategy.

PART 1: INTRODUCTION

This is Coventry's City of Movement Strategy.

This strategy is produced from a position of strength regarding what we have delivered as a City through our previous strategy where we have developed facilities costing over £100m, invested in parks and green spaces to enable physical activity in local communities and where we were awarded European City of Sport in 2019. We have also developed our Go CV card which has over 130,000 people signed up to receive discounts and promotional material on sports and physical activity in Coventry.

We do however recognise that there is more to do and the ambition of this strategy is straightforward: to encourage more Coventry residents to move more often alongside providing opportunities to take part in more physical activity and sport. The key aim is to reduce health inequalities across the city by better supporting those who face the greatest barriers to being active.

It is the result of an extensive research and consultation process which included direct engagement with over 70 stakeholders representing the NHS, schools, the voluntary sector, representatives from higher and further education (HE/FE), staff from Coventry City Council (CCC), its leisure facilities operator CV Life, Think Active (the active partnership for Coventry, Solihull, and Warwickshire) and the Positive Youth Foundation (PYF). In addition, the strategy's findings and suggested actions are informed by a resident survey (Lets Talk Movement - LTM) which was commissioned by CCC. This gained over 1400 responses.

1.1 Why a city of movement?

Coventry has long been a city that champions movement, physical activity and sport. From its founding role in the cycling industry, it being European City of Sport in 2019¹ to helping deliver the 2022 Commonwealth Games. It is a young, growing, diverse city which has a positive story to tell about how its communities and agencies work together to promote movement, physical activity and sport.

Through developing a city of movement, the aim is to make movement and physical activity an essential part of everyone's daily routine, helping all residents to live long and healthy lives which will form a significant further step in Coventry's story as an active city.

This commitment to supporting the role of physical activity as a preventative measure for ill-health and to improve health outcomes represents a collective, cross sector vision. It stems from the long-term focus on addressing inequality, enshrined within the One Coventry Strategy, the city's population health framework (see figure 1.1 below), its Marmot City status and the government's recent NHS 10-Year Plan all of which recognise the link between movement, physical activity and improved health outcomes.

'Sport & physical activity plays a key role not only in improving our mental & physical wellbeing, but in creating opportunities for people to make new connections, reduce social isolation and bring communities together.'²

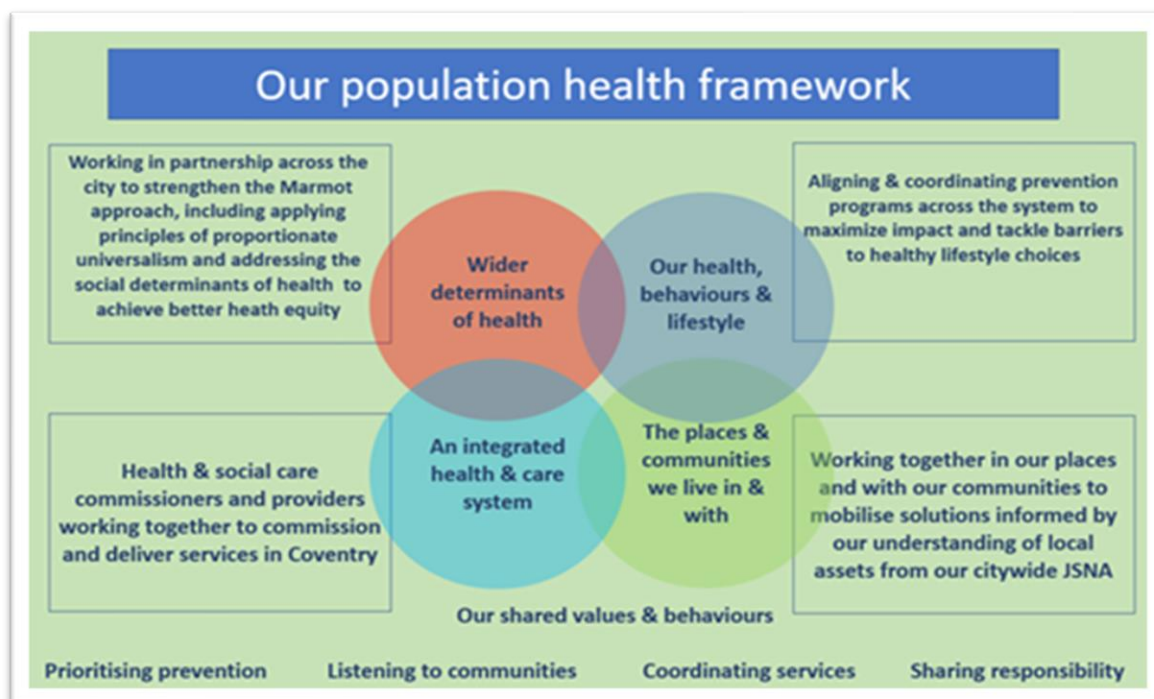
Themes discussed in the strategy align with the Coventry Local Plan (and the 2025 review), its parks and greenspace strategy, its indoor sports (sport/physical activity) facilities strategy, and its playing pitch and outdoor sports strategy, presenting a solid foundation upon which the City can build.

¹ <https://www.europeana.eu/en/stories/coventry-city-of-change-and-movement>

² Coventry Health and Wellbeing Strategy.

Maintaining our progress to truly be a city of movement will require a collaborative effort, led by local community organisations, charities, CCC, agencies such as CV Life, partners in the NHS, schools and community sports clubs. **The effectiveness with which we work together to help residents move more will dictate the success of this strategy.**

Figure 1.1 Coventry population health framework



The impact of cost-of-living challenges, and other ongoing barriers including the legacy of the Covid 19 pandemic have further exacerbated health inequalities across the city. Residents in more deprived areas live shorter lives and spend a greater proportion of their lives in poor health than those who live in less deprived localities. This affects the service delivery of voluntary bodies, community and social enterprises.

Momentum addressing levels of physical inactivity among the city's most vulnerable residents has been building over recent years. The Coventry on the Move framework established the principle that all people living in the city deserve access to good quality opportunities to be active. A proportionate universalism approach has been adopted, placing focus on supporting those who experience the greatest barriers to participation, such as those with the lowest levels of income or the unemployed, those living in poor housing and people with a long-term limiting illness or disability.

The city has a strong platform to build on based on effective cross sector partnerships and, in Go CV, a sector leading digital scheme with over 130,000 members it can reach an even larger portion of city residents focusing on those who may not as yet be engaged.

In line with the priorities of the city council's One Coventry plan, its health and wellbeing strategy and principles established by the Marmot approach, this strategy will:

- ✦ Be evidenced based and data driven.
- ✦ Tackle inequalities via a collaborative approach, involving co-production.
- ✦ Use evaluation to demonstrate effectiveness and ensure continuous improvement.
- ✦ Listen to our residents and what matters to them.

It is based around the following three core themes

- ✦ Connecting better.
- ✦ Movement for everyone.
- ✦ A place of movement.

PART 2: living an active life in Coventry

2.1 What do we mean by movement, physical activity and sport?

The World Health Organisation (WHO) defines physical activity as any bodily movement produced by skeletal muscles that requires energy expenditure. Physical activity refers to all movement including during leisure time, for active travel (walking, cycling) to get to and from places, or as part of a person's work or domestic activities.³

The title City of Movement reflects the fact that being physically active takes many forms and occurs in varied settings throughout life. For this reason, it is framed by the broadest definition of movement and physical activity. This encompasses activities in the home and daily routines (such as housework, gardening, shopping), in the workplace or education settings (for example walking between meetings or PE lessons), during leisure time and through active travel (for example, walking or wheeling). These sit alongside more strenuous or sport-based activities, including going to the gym or playing football.

Leisure centres, playing fields, playgrounds, parks and community centres will continue to be hubs of activity where a huge range of activity takes place. It is also accepted that not everyone has equal level of access to these environments and that the standard of these facilities varies across the city.

Whilst Active Lives data suggests that running, swimming, going to the gym and football are currently the most popular⁴ physical activities amongst Coventry residents, many other pursuits are, will be and should be available. Listening to the city's diverse communities, discovering what activities people want to do and then finding ways to support them to take part in, and perhaps lead, these activities will be essential.

2.2 Coventry: demographic profile

Factors such as an individual or family's income level, work status, housing, gender, age, ethnicity, whether they have a disability or live in an economically deprived area, continue to affect their habits around movement and physical activity⁵.

Coventry is one of the most ethnically diverse cities in the UK⁶. More than 50% of schoolchildren are from a defined global majority group (up from just under 40% in 2012).⁷

³ [Physical activity](#)

⁴ Source : Sport England Active Lives 2023/4

⁵ Sport England's Uniting the Movement strategy cites these factors as affecting activity levels.

⁶ 45% of Coventry's population identified as global majority, up from 33% in 2011, which is higher than both the regional (28%) and national average (26%) Source : Census 2021

⁷ According to the latest school census in 2022, 55.9% of Coventry's school children are from a global majority group, this is an increase from 39.7% in 2012 (Coventry City Council, 2022)

Coventry is also a young city having experienced noticeable recent growth in its child (5-14) population, having a large and growing student population and with a higher proportion of residents aged between 25-39 when compared to the rest of England.

The number and proportion of children who live in 'relative poverty' (just under 27% or around 18,000) in Coventry is substantially higher than the national rate (20%). The city has substantial pockets of high overall deprivation; more than 14% of its neighbourhoods are ranked in the 10% most deprived in England.⁸

Where people live in Coventry really matters in terms of their health outcomes. Whilst overall life expectancy for men and women has increased, there remain significant gaps (nearly 15 years for men and 8.5 years for women) between the levels in richer and poorer areas of the city, and fewer residents stay in good health overall as they get older.⁹

The number and proportion of overweight or obese children in Year 6 in the city is also consistently above regional and national levels.

2.3 Current activity levels

Current Sport England Active Lives (ALS) data identifies the following positive trends in respect of levels of activity in Coventry:

- ✦ Fewer adult residents are inactive, and more are regularly active when compared to the region as a whole (see Appendix 1: Figure 2.1).
- ✦ The number of inactive adults living in the more deprived parts of the city has fallen steadily since the Pandemic.
- ✦ Significantly more children and young people are regularly active in Coventry when compared with regional and national levels. It also has lower levels of inactivity compared to regional and national levels (see Appendix 1: Figure 2.2).
- ✦ More disabled people are active in Coventry compared to regional and national levels - and fewer of them are inactive (see Appendix 1: Figure 2.3).
- ✦ In respect of social class, levels of inactivity in Coventry amongst residents of lower social status are significantly higher, versus those of a higher social status, mirroring regional and national trends (see Appendix 1: Figures 2.4 and 2.5).

Further analysis of ALS data¹⁰ in Coventry identifies that its 35-54 and 55-74 age groups contain high proportions of inactive residents when compared to national levels. This has informed recent targeted initiatives such as Coventry Moves.

2.4 Barriers and enablers to activity

Creating a City of Movement which endures for the long term needs to start with properly understanding the make-up, needs and wants of Coventry's residents. Who lives here, what stops people from being more active, the things that may encourage them to be more active and crucially what makes Coventry unique? This sits alongside what we should keep doing to maintain the physical activity levels of those who are already active.

⁸ Coventry is ranked as the 46th most deprived borough in England; 14.4% of the city's neighbourhoods are ranked in the 10% most deprived areas in England (IMD 2019)

⁹ Sources : ONS, One Coventry Plan Annual Performance Report (April 2024 - March 2025)

¹⁰ ALS survey 2021/2

Recognised factors¹¹ which may be preventing people from being active in Coventry include their working patterns (they work long or irregular hours), caring responsibilities, whether English is the first language in their household and whether they have to deal with poor transport links¹². When asked as part of the LTM survey, residents who considered themselves not to be regularly physically active also told us that (amongst other barriers - see Appendix 1) their reasons for not taking part include:

- ◀ Lack to time;
- ◀ Lack of motivation and;
- ◀ No-one to be active with.

In looking to overcome these barriers, learning both in the city and based on best practice guidance is that individuals in the community, including those that lead local groups and organisations are often best placed to unlock issues and deliver solutions that can make change happen. Initiatives such as **Go Foleshill** have taken this approach for example, equipping local women with the skills and confidence to lead activity sessions, creating safe, accessible opportunities for movement within their own communities. When, as part of the LTM, residents were asked about what would motivate them to become active, they cited the following:

- ◀ **Affordable access** - to classes, memberships and transport, with flexible payment options and free or low-cost parking¹³.
- ◀ **Improved information**- about local opportunities, with better promotion and signage.
- ◀ **Inclusive provision**- including women-only, disability-friendly, and culturally appropriate activities.
- ◀ **More group activity in parks** - including walking, running, and exercise sessions for people of all ages and abilities.
- ◀ **Improved safety in parks and other outdoor environments**- especially for women and vulnerable groups, through better lighting, visible security and well-maintained paths.
- ◀ **Better facilities in parks and other public spaces** —such as outdoor gyms, pathways, benches, toilets, and inclusive equipment.
- ◀ **Enhanced connectivity** - with safer walking/cycling routes and reliable public transport to parks and leisure venues.

The following sections of the strategy set out the actions required to achieve the above desired outcomes.

¹¹ Cited in One Coventry Plan Annual Performance Report April 2024 - March 2025)

¹² In consultation, schools, including those with an SEN specialism report that travel costs are currently a significant barrier to young people accessing swimming provision across the city.

¹³ Evaluation of 2022 Commonwealth Games funded activity in the city also noted that free organised activities within localities did result in a level of engagement among people who would not normally participate.

PART 3: ACTIVE SYSTEMS – CONNECTING BETTER

Outcome

The system for movement, physical activity and sport in Coventry is cohesive: creating and sustaining the conditions within which sport and physical activity opportunity is universally promoted, understood, effectively delivered and sustainable.

What needs to be done

- To develop the existing strategy core group into a better-connected place partnership for sport, physical activity and movement that are accountable to deliver the strategy and all place-based investment.
- Through the above partnership secure and deliver investment for the city as part of the Sport England place-based expansion programme.
- To deliver a LGA leadership programme in partnership with Sport England to ensure that sport, physical activity and movement are connected and embedded in approach / co designed with local communities.

What will be different

Our partnership with local organisations will be built upon through extending the range and the reach into communities through establishing a wider network connected to the movement agenda. This will in turn ensure that resources and programmes that become available to us are deployed in a manner that reaches into communities and starts to address some of the barriers identified. The ability to deliver this will be improved through increasing system wide leadership capacity.

What this means

Put simply, this means all agencies in the city being interested in promoting, delivering or assisting people to take part in movement and physical activity working well together to support our residents to be active and move more often. This is an opportunity to build on the solid foundations and strong partnerships created by the Coventry Sports Strategy 2014-2024, Coventry on the Move and Coventry's experiences as the city of culture to be a leading national example of how physical activity, movement and sport can contribute to the health and wellbeing of its communities.

'The public sector has a responsibility to change how it works with community groups across and between sectors. There is an appetite across local and voluntary organisations for more joined-up working to improve awareness and communication of the activities and networks available in the city.' (Coventry JSNA)

Tackling inactivity and getting more people active is a complex outcome to achieve. It requires strong relationships between services, organisations and people who perhaps have not always worked closely together before.

Partners across Coventry are committed to providing collective leadership and advocacy for the City of Movement, working across a wide range of sectors to influence positive, system-wide change. Through this strategy, the developing physical activity place partnership will mature to become the custodian of the wider portfolio of work, intentionally broadening leadership beyond larger institutions and into strong, community-based leadership rooted in local places.

Mapping and connecting the broader network of individuals, community organisations and agencies that can contribute to, and benefit from physical activity is a crucial success factor. Coventry is well-positioned and can build on alliances already in place; its Marmot City status, via networks such as its Coventry youth partnership and extending approaches to community stakeholder engagement developed in linked sectors such as adult social care. Coventry has a strong VCFSE presence who work in hyperlocal communities, and this is something for the city to build on, supporting smaller organisations to enhance community leadership.

Coventry's communities should take the lead deciding what activities suit them, as they have in projects such as Go Foleshill, Go Canley and Go Parks. The next phase will involve continuing to learn and share best practice from this work, and to develop similar but locally bespoke examples elsewhere in the city. This will require careful thought about the support (including new skills, resources and knowledge) that is needed recognising that every neighbourhood has its own characteristics, challenges, specific barriers and enablers to activity.

Connecting residents and providing **equal opportunity via digital** means (e.g. smartphone or tablet) to movement and activity is essential to address information exclusion amongst young people plus more vulnerable groups such as people experiencing cost of living challenges, older and disabled people¹⁴. It will involve, for example, ensuring that CV Life facilities, programmes and services are effectively communicated via Go CV link reflecting Cov Connects principles across the city.

How we will make progress

- Continue to grow a network of local organisations capable of supporting Coventry's movement and physical activity/sport eco-system.
- Continue to support, develop and learn from community led approaches to movement, physical activity and sport.
- Build the skills, resilience, knowledge and human resource to support a culture of movement and physical activity across the city.
- Advocate for the value of movement, physical activity/sport to/with partners across the system.

¹⁴ Source : <https://www.goodthingsfoundation.org/policy-and-research/research-and-evidence/research-2024/digital-inclusion-datasets>

- Ensure the promotion of movement and physical activity/sport opportunity contributes to reducing digital exclusion

PART 4: ACTIVE PEOPLE – MOVEMENT FOR EVERYONE

Outcome

Increased engagement and participation in movement, physical activity and sport for all Coventry residents, in particular among people from its most deprived and vulnerable groups.

What needs to be done?

- To implement marmot principles when planning and designing all place-based activity in Coventry.
- To deliver place-based activation to reduce inequalities, increase movement and improve health lifestyles in local neighbourhoods.
- To co-produce and annual action plan that is locally led by residents and community organisations as part of the place partnership.

What will be different

Over the life of the strategy the current position in respect of physical activity in Coventry will start to improve – there is no one specific target group here as inactivity levels are low across children, middle aged men, those aged 16-34, people in most deprived groups and global majority groups.

Opportunities for people to be more active will be developed in a way that is inclusive, accessible and sustainable through using resources available through the Place Based Expansion programme

What this means

This strategy aims to support the whole population in Coventry to be active. This means supporting **all** Coventry residents of **all** ages from **all** parts of the city to develop and maintain lifelong physical activity and sport habits.

More accessible opportunities need to be provided for people who experience the greatest levels of inequality and/or who experience other significant barriers to access and need additional input and support.

What do people want to see?

The LTM survey identified affordability as a particularly significant factor deterring people from signing up for activity in Coventry. Activity needs to be more attractive and accessible to people/families with limited disposable income, wrapping around busy working and family

lives and be accessible via easy ways to book and pay online. Affordability also has to be seen in the context that unless activities are financially sustainable, they will cease to exist at all.

Not feeling safe in the city's parks and open spaces is a discouragement to people being active outdoors. This requires changes to how parks are looked after and cross-sector effort with partners in the community organising activities, supporting with policing and being creative in outdoor spaces to bring about positive change. Their being free to access, and their wide availability makes better use of parks a strong antidote to issues of affordability and time restrictions experienced by many people.

Residents want more activities that are tailored to their needs and preferences, whether that be female only swim sessions, sessions able to be easily accessed by disabled people, or being able to access gym equipment which offers assistance for those with long term health conditions.

Testing and trialling the activities in which **young people** wish to be involved and opening up opportunities to try activities they might not have previously considered, addressing the specific barriers they face as well as testing and promoting proven enablers to activity is a clear priority for this strategy. The Coventry Youth partnership will help to shape the activity offer for young people in Coventry. In addition, child Friendly Coventry is another key mechanism as is the school games network.

Community led

Research¹⁵ suggests that grassroot organisations in the city will be more effective supporting community cohesiveness when given more opportunity to develop their capability and exchange knowledge. There is an identified appetite among residents to become more actively involved in their communities.

This strategy proposes that community sector organisations, social prescribers and voluntary groups are supported and encouraged to take the lead testing, assessing and defining the activities in which people wish to take part. Support will be provided to these bodies to develop their confidence, skills and capabilities to lead this change.

The strategy action plan will focus on learning from these interventions and encourage delivery of similar projects in different contexts serving other parts of the city. The larger organisations in the city, CV Life and PYF remain cornerstones of the city's physical activity offer and are committed to be part of the movement to support community sector organisations to grow in this space.

System partners such as national governing bodies of sport (NGBs), the Muslim Sports Foundation and the Youth Sport Trust also have a vital role to play supporting community organisations. In some instances, they also provide financial and human resource to enable community-led activity to help address barriers associated with more traditional club-based sporting activities. In addition, working with UK Sport and other events has often been a catalyst to inspire increased activity levels in Coventry and should remain a focus to bring a variety of events that are connected to the local communities to increase movement levels.

¹⁵ Source : Coventry [JSNA](#)

Activity made easy

The broadest range of settings should be available to people to be active. These include schools, faith settings, family hubs, parks, community centres, libraries, workplaces, streets and neighbourhoods, alongside those which might be termed 'traditional' places to be active such as leisure centres and parks.

Being active at a CV Life venue, encouraged via the Go CV platform, or in an activity organised in a care setting, on a playing field or in play park will continue to be among the ways that many people choose to take part. Coventry's annual Sports Fest is an example of the type of inclusive, open access activity that will continue to feature and which should be used to present and promote a wide range of activity options. Activity pricing, the way that people book, and how Go CV is used to extend and improve people's experience of activity are all factors critical to this strategies success.

Research shows that the benefits of having an active workforce include increased productivity and decreased employee risk of developing costly and debilitating diseases¹⁶. Building on initiatives such as Fairer Coventry, which advocates the role of employers in improving health and wellbeing, and the UK Corporate Games being held in the city in 2026, this strategy will champion physical activity and movement as a feature within the city's workplaces.

Creating more opportunities with large employers (such as the NHS and the CBS arena) could have a considerable impact on activity levels. This will necessitate employers (with the support of partners such as CCC/Think Active) working with staff to rethink how activity fits into their organisation.

Movement for health

The research underpinning this strategy includes views sought from healthcare professionals. This confirmed the keenness to see physical activity better integrated with NHS treatment pathways. A common issue in the sector is that health professionals struggle to know where or to whom to refer someone to in order to access movement or activity.

Specific groups of residents experience health inequalities which affect their level of access to physical activity. These include older adults as they start to require support, younger adults with disabilities and young people with severe mental health issues. They often have difficulty finding suitable exercise environments.

They may also require quite intensive support within an activity setting however, the personal and societal benefits of activity can be significant – for example, in terms of reducing risk of diabetes and cardiovascular disease.

We want to make sure that people with long-term health conditions, or who have been referred into activity by their doctor, have a good experience and receive the right guidance - whether that be at a leisure centre or in another community space. More importantly we are keen to ensure that people's journey into activity is sustained and becomes an established part of their daily and weekly lives.

¹⁶ <https://publichealth.jhu.edu/sites/default/files/2023-06/whrn-pa.pdf>

An effective health referral programme is one key tool via which CCC, working closely with CV Life and health partners can reduce levels of physical inactivity. It is also an ambition to deliver other NHS primary care services, such as cardiac rehabilitation within the leisure estate; thereby delivering joint outcomes.

This will involve improved cross-departmental work and effective collaboration with health partners to identify funding and to consider how referral into physical activity can be best embedded alongside re-organised neighbourhood primary care structures including social prescribing teams.

A broad, cohesive physical activity referral pathway is needed, featuring multiple routes into movement and activity. This will include CV Life's healthy lifestyle programme plus alternative options hosted at community venues and incorporating activity located in the outdoors supported by green social prescribing. The options for activity referral need to be communicated effectively, including within and via healthcare settings.

Achieving a broad pathway will be dependent on providing and transferring the skills and knowledge required to ensure safe and effective exercise programming for patients with a range of medical conditions to a comparably broad cohort of activity leaders, health coaches and volunteer staff in the city.

How we will make progress

- Encourage co-designed, community led activity to broaden engagement with inactive residents particularly those experiencing specific barriers to access.
- Continue to offer affordable, accessible, inclusive activity via CV life venues and outreach programmes.
- Develop and extend opportunities to move and be active in the workplace.
- Provide a broad physical activity referral pathway which provides excellent outcomes for residents experiencing long term health conditions.
- Develop and extend opportunities for young people to be active.

PART 5: ACTIVE PLACE – A PLACE OF MOVEMENT

Outcome

Coventry residents are better connected to, and benefit from moving and being physically active in, built and outdoor environments.

What needs to be done?

- To create annual plan of capital developments that support the delivery of the playing pitch and outdoor sports strategy, green space strategy and indoor sports facilities strategy whilst supporting informal local spaces led by local insight.
- To market, promote and activate accessible local places to increase sport, physical activity and movement alongside communities.
- To enhance the connectivity of the city linked to Sport England's active design principles to encourage active travel and enable residents to embed movement into their daily lives.

What will be different

Localised sports and physical activity developments will be the focus of capital monies that are available. The focus will be on developing smaller scale facilities such as Play-Zones, Padel courts and public park enhancements and community spaces. This means that more people will be able to see and experience what is available in their neighbourhoods. Through this focus on local spaces the barriers of time constraints, motivation and a sense of inclusivity will start to be addressed and will encourage the continued shift to embedding PA and movement into everyday life. This is where the City of Movement strategy intersects with other relevant strategies

What this means

Creating and sustaining places to be active in Coventry means ensuring that both natural and built environments are attractive, accessible, affordable and safe for all residents.

It also means engaging with communities in a way that reflects the fact that movement and activity needs to be wrapped around people's daily lives, in their homes, in schools, in parks and playgrounds, at community centres, in faith settings - and embedded in the way in which people travel in and across the city.

Enabling better places for movement and physical activity is also about working with agencies outside or linked to the physical activity sector to create change. This includes the range of organisations representing the outdoor and natural environments.

In terms of the built environment, the continued growth of the city and development of regenerated housing estates creates opportunities to ensure that housing development is designed to enable and encourage movement and physical activity. This is an opportunity to apply best practice such as the guidance in Sport England 's Active Design principles.

Go indoors

CCCs indoor sports facility strategy evidences the good quality leisure centres in the city and the fact that they are generally well placed in relation to the communities they serve. The city is due to grow further in the coming years which means that making better use of a broad range of environments, including school facilities, will be key.

LTM findings indicate that a number of Coventry residents are challenged by the affordability of participating in physical activity although this was secondary to factors of available time, motivation and other commitments. This affordability issue presents a challenge as facilities do need to be financially sustainable. Consideration needs to be given extending the range of neighbourhood based affordable opportunities to exercise to that residents have different options to choose from.

Other barriers described in the LTM findings relate to the need to provide more opportunity to just 'turn up and play' and classes which fit around people's working and other family and lifestyle requirements. If booking is absolutely necessary in respect of having a swim or attending a class, this needs to be made as visible and accessible as possible.

The key is to establish mechanisms which will enable people from all the city's communities to affordably access opportunities to keep fit, learn to swim and take part in a range of sports and activities.

Go outdoors

Coventry's 400+ parks and open spaces present a ready-made setting for movement.

In the LTM survey, residents said they wished to see more safe routes in parks and green spaces and that they are keen to take part in more walking, cycling, running, and exercise in local parks. Making this happen will involve working with community groups to consider how they can improve perceptions of safety – for example through organised walking and running groups. There may also be a role for community policing teams where there are specific factors such as anti-social behaviour that are preventing people from using the public spaces available to them. There is also a role for transport planners to improve active travel infrastructure and building on models for local sports club ownership such as the pilot Home Advantage Funded work with the Football Foundation in Coundon Hall Park.

The Go Outdoors arm of this strategy will deliver promotion (via Go CV) of a range of community routes and events, including walking and cycling and will involve young people and 'friends of' groups becoming more involved in taking decisions about the development and use of local assets.

Parks need to be made attractive to and accessible for all of our residents. This means providing better lighting, outdoor gym equipment and continuing to invest in improved Playzones, tennis courts, padel courts, pump tracks, playgrounds and hard-standing footpaths to make parks accessible year-round.

The Go Parks initiative delivers multiple activities for young people at low or no cost in parks and open spaces which are being positively reclaimed by local communities. These are delivered by a range of organisations who form the Coventry Youth Partnership. Some of its events also involve street closures which may present a model that can be learnt from and repeated elsewhere in the city.

Local partners in the city and wider West Midlands region (Including the West Midlands Combined Authority – WMCA) are committed to both adults and children having a positive experience outdoors. This is illustrated by the aims to offer:

- ▶ More accessible, welcoming and safe community spaces.
- ▶ Greater availability of green, grey and blue local spaces of the highest quality.
- ▶ Outdoor community events in/at walkable environments.
- ▶ More and improved access to walking, cycling, and active travel by creating the optimum environmental and social conditions to enable this to happen.

Walking and cycling

CCC is committed via its transport strategy and emerging Local Cycling and Walking Infrastructure Plan to improving local conditions for cycling and walking across the city, recognising the beneficial link to the reduction of health inequalities. The aim is to achieve:

'Higher levels of walking and cycling and improved public transport options, which enable those on the lowest incomes to easily access major employment centres and transport hubs, will be essential to address health inequalities. (CCC Transport Strategy).

Creating better conditions to allow more people to walk and cycle will involve improvements to the physical environment (i.e. better footpaths and cycle lanes, cycle storage). It will also necessitate considering how walking and cycling can be better embedded within people's daily lives, especially residents who may feel excluded because their home is poorly connected or has insufficient storage space to enable ownership and use of a bicycle.

Existing opportunities to join led walks from local venues will be continued and expanded and new options developed via local organisations interested in offering their own routes.

Feedback from cycle stakeholders in the city suggests a need to encourage socially accessible ways to join with others to walk and cycle such as via workplace bicycle user groups and social cycling clubs suitable for beginners and/or for those not sufficiently confident or fit to participate in a traditional club setting.

Existing infrastructure, such as CV Life venues and community venues have a role to play as potential locations to hire a bike and to receive training such as that offered via Bikeability and via advocacy of initiatives such as Cycling UKs big bike revival.

How we will make progress:

Go outdoors - Promote and develop more local, accessible, good quality places to be physically active outdoors across the city.

Go indoors - Promote and develop more local, accessible, good quality places to be physically active indoors across the city.

Go local - Continue to develop, promote and support community led approaches to movement, physical activity/sport in non-traditional facility settings.

Walking and cycling - Provide improved physical infrastructure, alongside new socially orientated walking and cycling opportunities across the city.

PART 6: EVALUATION

Outcome

There is clear evidence of impact from a range of sources including data alongside feedback from residents on what they are experiencing as different

What needs to be done

- To test, learn, share with communities to inform future developments to capture impact and deliver strategic priorities.
- To deliver an annual report on sport physical activity and movement that reports to the health and wellbeing board and associated governance.
- To adopt the national evaluation and learning partnership's nine conditions of change and utilise as an overall position of change and system maturity.

What will be different

We will be able to identify specific what is different and the impact it is having. This will be through what people see happening, what they hear about and what they can participate and engage personally with.

What this means

A mixed methods approach will be taken to the evaluation of strategy themes and actions, emphasising the need for continuous learning, and the participation of residents in the process.

Qualitative approaches, including case study / story telling development will be most appropriate to explain how and why changes are happening within existing placed based work such as Go Foleshill, Go Canley and Go Willenhall : projects whose stated outcomes are to build trust amongst residents and to secure community engagement beyond their initial grant funding. This learning will inform the extension of place-based work in other parts of the city, especially linked to Sport England place-based expansion.

Bespoke approaches will be adopted to test and learn about new interventions in specific environments, such as workplace physical activity. Here, it may be appropriate to link with an academic partner such as Coventry University or the University of Warwick to add an element of independent validation to such research.

The Go CV scheme is a vehicle by which views can be sought from residents on what they might wish to do by way of activity choice, the quality of their engagement in activities and about barriers and enablers to activity that they experience. It will be used alongside insight from the councils resident survey, to ensure that new interventions are shaped based on community led need.

Quantitative data such as the demographic profile of use within CV Life venues and taking part in outreach activities will also be collected via Go CV and used alongside national data such as Active Lives and Moving Communities. This element of evaluation will be critical to tracking strategy impact in respect of 'moving the dial' and broadening engagement in physical activity across all demographic groups in the city - with a particular emphasis on those experiencing the greatest inequalities.

As an emerging Sport England place partnership area, the lead agencies in Coventry will adopt the nine National Learning and Evaluation Partnership (NELP) conditions for change below as part of their ongoing impact evaluation of this strategy. This will build on the test and learn approach to date within Coventry that has seen a significant shift in supporting the national process in developing the system maturity matrix and will be part of the place-based expansion work.

These nine conditions for change are:

- ◆ Process for Identifying the barriers and enablers of physical activity.
- ◆ Organisational policies, processes, and structures that enable place-based working.
- ◆ Capacity and capability across the workforce, volunteers, and communities.
- ◆ Collaboration.
- ◆ Leadership.
- ◆ Community-led action.
- ◆ Cultures and practices for physical activity.
- ◆ Built and natural environments that enable physical activity.
- ◆ Cycles of learning and action.

How we will make progress

- Adopt qualitative approaches to learn from existing place-based work such as Go Foleshill, Go Canley, Go Willenhall, Go Parks and Coventry Moves.
- Deliver bespoke evaluation of new interventions.
- Utilise existing tools including Go CV, Moving Communities and Active Lives to evaluate performance of strategy interventions.
- Adopt National Evaluation Learning Partnership conditions for change as overall measures of change against which the City of Movement strategy will be measured.

7. Acknowledgements

Consultants, Knight, Kavanagh and Page (KKP) conducted an independent study in partnership with the Coventry Core Strategy Group to write the City of Movement strategy.

The development of this strategy has been developed by the emerging Active Coventry Partnership, and its delivery have only been possible through the generous engagement and commitment of the many organisations that have worked with us who are as follows:

1. <i>Aptitude Youth Work</i>	27. <i>CV Life</i>	54. <i>Secondary Heads Partnership</i>
2. <i>Ascension Dance</i>	28. <i>Disability Equality Action Partnership</i>	55. <i>Short Football</i>
3. <i>Assist Trauma Care</i>	29. <i>Empowr-U</i>	56. <i>Sky Blues in the Community</i>
4. <i>Birmingham County FA</i>	30. <i>EnV Coventry</i>	57. <i>Soccer Rockz</i>
5. <i>Be Active Be Healthy</i>	31. <i>Futures Trust</i>	58. <i>Special Schools Heads Partnership</i>
6. <i>C&W Partnership Trust (Pediatrics)</i>	32. <i>Good Gym</i>	59. <i>Sport England</i>
7. <i>Change Grow Live</i>	33. <i>Grapevine Coventry</i>	60. <i>Sporting Equals</i>
8. <i>Chat Central</i>	34. <i>Guardian Ballers</i>	61. <i>St Finbarrs</i>
9. <i>Child Friendly Cov</i>	35. <i>Healthy Lifestyles Service</i>	62. <i>St Giles</i>
10. <i>Coventry & Warwickshire Mind</i>	36. <i>Herbert Art Gallery & Museum</i>	63. <i>St Marks Coventry</i>
11. <i>Coventry Bears</i>	37. <i>Health & Wellbeing Board</i>	64. <i>Street Games</i>
12. <i>Coventry Boys & Girls Club</i>	38. <i>Highly Sprung</i>	65. <i>The Albany Theatre</i>
13. <i>Coventry City Council – Active Travel</i>	39. <i>Hillz FM</i>	66. <i>The Highlife Centre</i>
14. <i>Coventry City Council – Education & SEND</i>	40. <i>ICB CMO</i>	67. <i>Think Active</i>
15. <i>Coventry City Council – Parks & Green Space</i>	41. <i>ICB Long Term Conditions</i>	68. <i>Together for Change Coventry & Warwickshire</i>
16. <i>Coventry City Council – Public Health</i>	42. <i>Imagineer</i>	69. <i>University Hospital Coventry & Warwickshire</i>
17. <i>Coventry City Council – Public Health</i>	43. <i>Marmot Partnership</i>	70. <i>University of Warwick</i>
18. <i>Coventry City Council – Sport Development</i>	44. <i>Media Mania</i>	71. <i>Valley House</i>
19. <i>Coventry City FC</i>	45. <i>Moat House Community Trust</i>	72. <i>Vanny Radio</i>
20. <i>Coventry Outdoors</i>	46. <i>NHS Coventry & Warwickshire Partnership</i>	73. <i>Voluntary Action Coventry</i>
21. <i>Coventry Rugby Club</i>	47. <i>One Coventry</i>	74. <i>West Midlands Police</i>
22. <i>Coventry School Games Organisers</i>	48. <i>Outdoor Education</i>	75. <i>Wild Earth</i>
23. <i>Coventry University</i>	49. <i>Outdoor Partnership</i>	76. <i>YMCA Heart of England</i>
24. <i>Coventry Youth Partnership</i>	50. <i>Positive Youth Foundation</i>	77. <i>Youth Focus West Midlands</i>
25. <i>Creative Optimistic Visions</i>	51. <i>Primary Heads Partnership</i>	78. <i>Youth Justice Service</i>
26. <i>Culture Coventry</i>	52. <i>Prince's Trust</i>	
	53. <i>Rising Stars</i>	

In addition, there were 1,400 residents who completed our Lets Talk Movement public survey which has informed the Strategy's priorities and focus areas.

Appendix 1: Current activity levels

Figure 2.1: Sport England Active lives (adult data) 2023/4

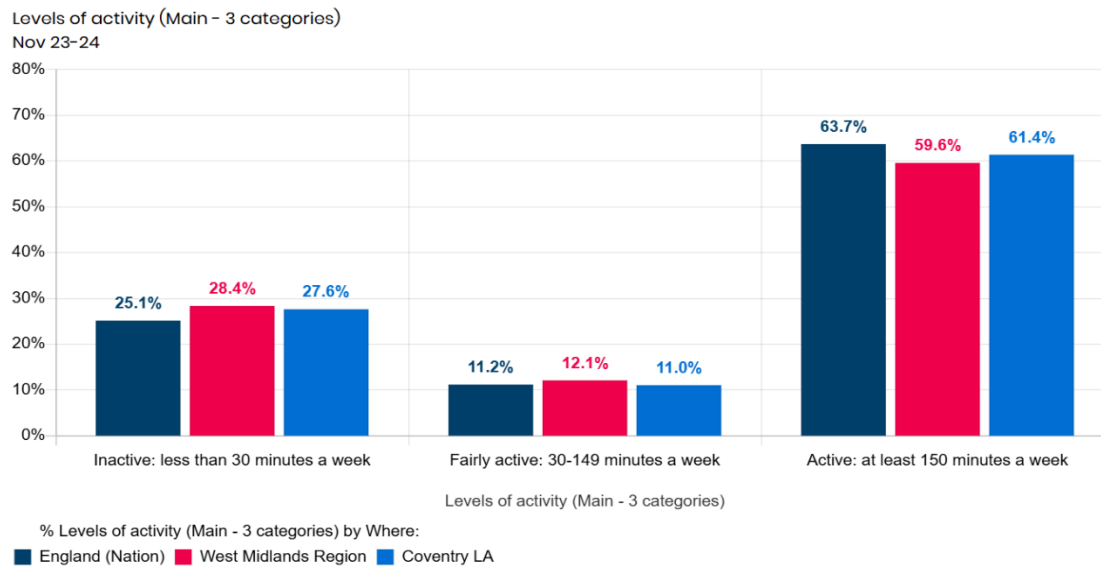


Figure 2.2 Sport England Active Lives data: children and young people 2024/5

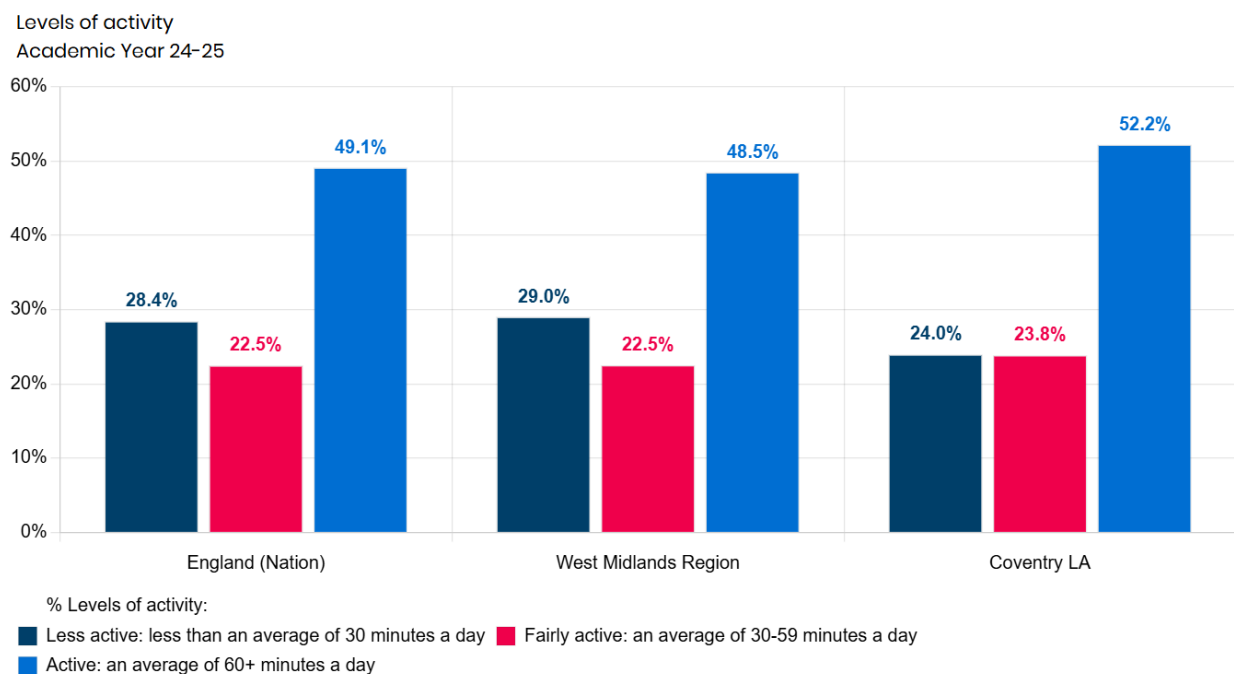


Figure 2.3: Sport England Active Lives data: disability 2023/4

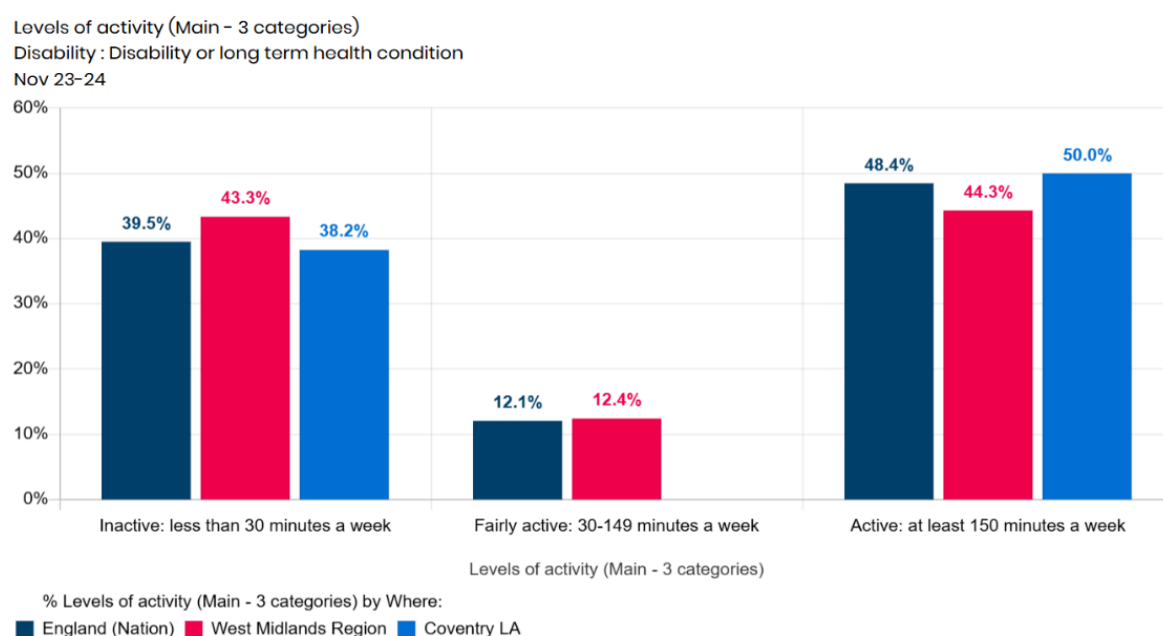


Figure 2.4 Sport England Active Lives data: social status (NS SEC 6-8: lower)

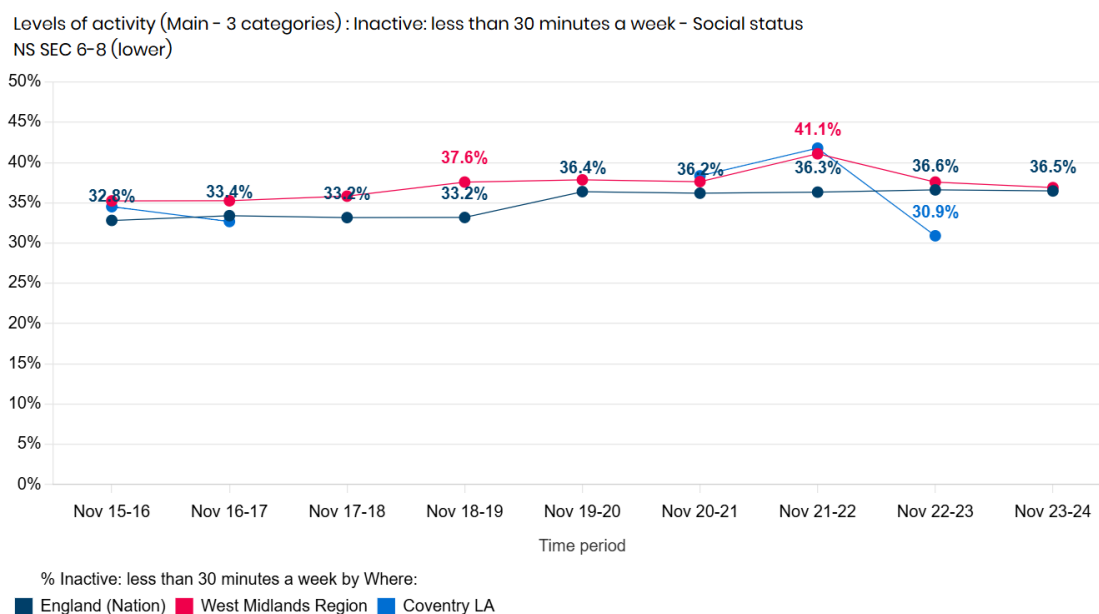
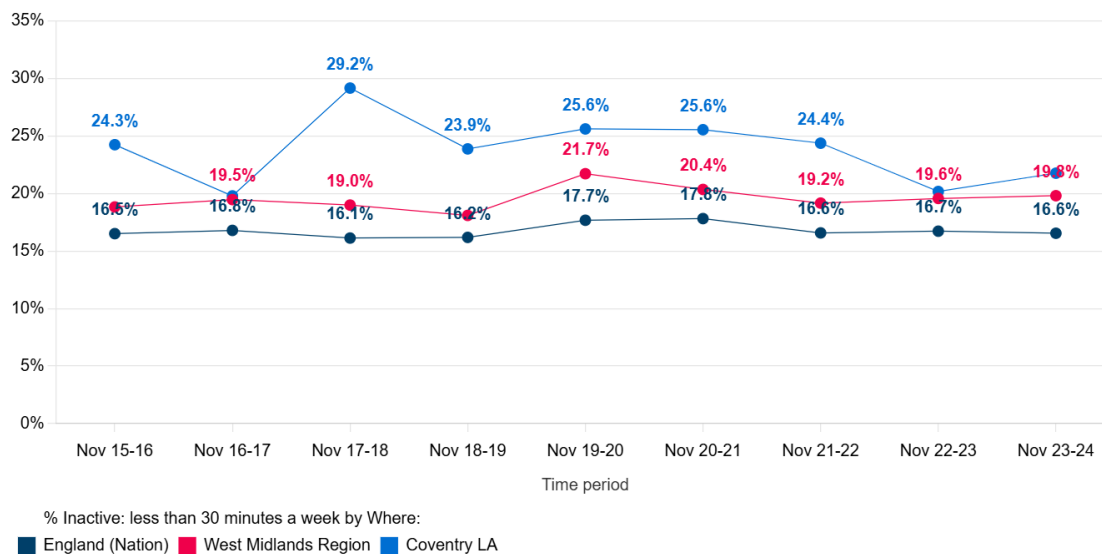
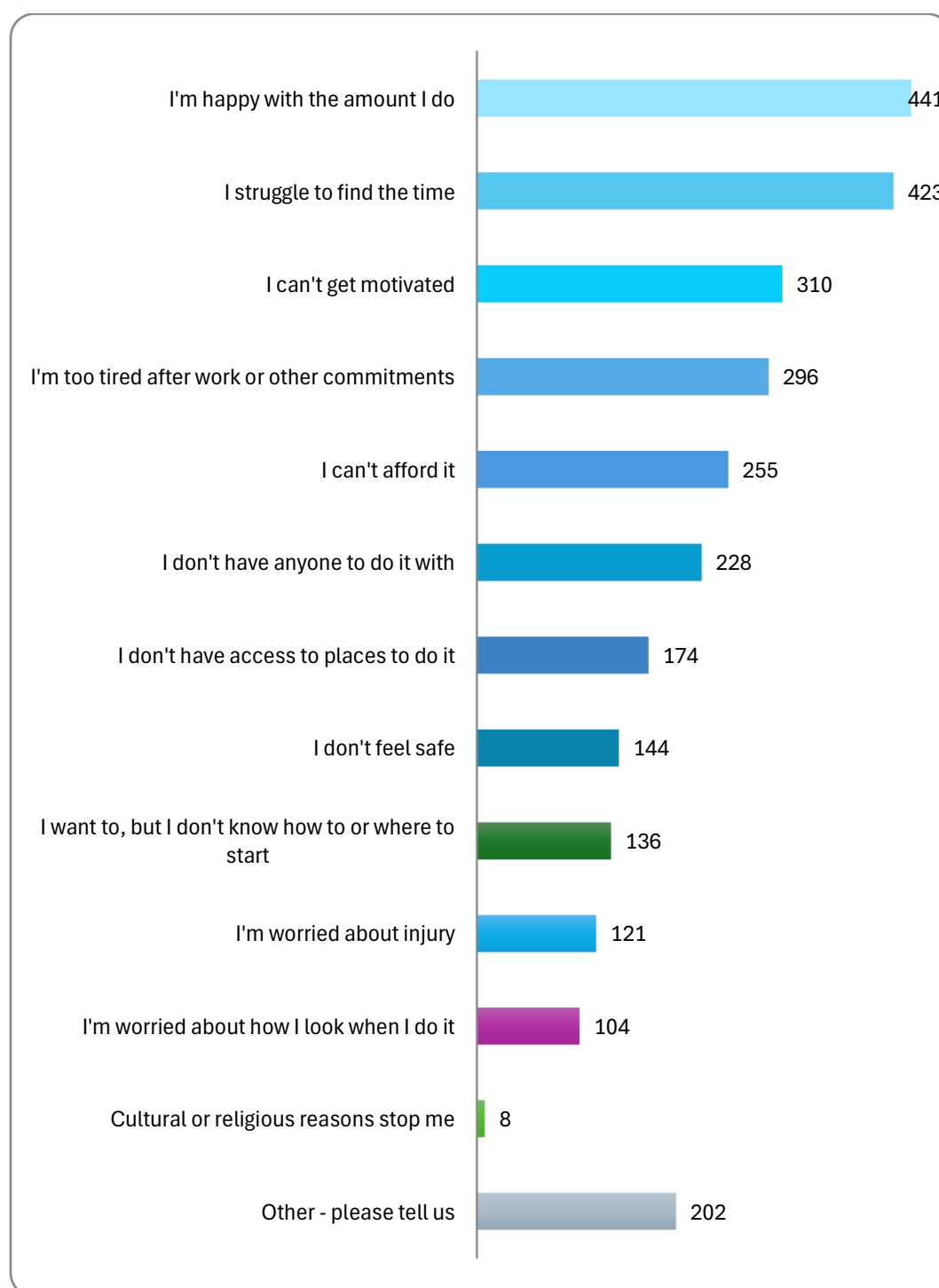


Figure 2.5 Sport England Active Lives data: social status (NS SEC 1-2: higher)

Levels of activity (Main - 3 categories) : Inactive: less than 30 minutes a week - Social status
NS SEC 1-2 (higher)



Appendix 2: Let's Talk Movement findings: Barriers to access



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Details

Title	Coventry: City of Movement Strategy
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Cabinet Member	Cllr Kamran Caan (Public Health, Sport and Wellbeing)
Director	Pete Fahy (Care, Health and Housing)

Context and background

EIA carried out on	New policy or strategy
This is an Equality Impact Assessment (EIA) of the draft Coventry: City of Movement Strategy. The Strategy aims to increase sport, physical activity and everyday movement, through tackling inactivity and related health inequalities. The Strategy focuses on designing a city where movement is built into daily life, not only through formal sport, gyms or sports clubs – it's about walking, cycling, parks, play, community activity, workplaces, schools and neighbourhoods This EIA aims to ensure the strategy, and the recommendations that will result from its roll out (when officially adopted), eliminate unlawful discrimination, harassment, and victimisation; advance equality of opportunity between different groups; and foster good relations between different groups. This EIA accompanies the Strategy which is the result of an extensive research and consultation process which included direct engagement with over 70 stakeholders representing the NHS, schools, the voluntary sector, representatives from higher and further education (HE/FE), staff from Coventry City Council (CCC), its leisure facilities operator CV Life, Think Active (the active partnership for Coventry, Solihull, and Warwickshire) and the Positive Youth Foundation (PYF). In addition, the strategy's findings	

and suggested actions are informed by a resident survey (Let's Talk Movement - LTM) which was commissioned by CCC and gained over 1,398 responses from residents.

Background

This Strategy will serve as a blueprint for the current and future development of sport, physical activity and movement initiatives, to meet the needs of the diverse Coventry population.

The ambition of the strategy is to encourage more Coventry residents to move more often alongside providing opportunities to take part in more physical activity and sport. The key aim is to reduce health inequalities across the city by better supporting those who face the greatest barriers to being active.

The strategy and this EIA support the priorities of the One Coventry Plan:

- Improving outcomes and tackling inequalities within our communities

- Council's role as a partner, enabler and leader

In line with the priorities of the city Council's One Coventry plan, its health and wellbeing strategy and principles established by the Marmot approach, this strategy will:

- Be evidenced based and data driven.

- Tackle inequalities via a collaborative approach, involving co-production.

- Use evaluation to demonstrate effectiveness and ensure continuous improvement.

- Listen to our residents and what matters to them.

The Strategy is based around the following three core themes:

- Active System: Connecting better.

- Active People: Movement for everyone.

- Active Place: A place of movement.

The Strategy and its roll out will potentially affect all those that live, work and visit the city with the objective to encourage more Coventry residents to move more often alongside providing opportunities to take part in more physical activity and sport. The key aim is to reduce health inequalities across the city by better supporting those who face the greatest barriers to being active. The Strategy also aims to enhance local sports infrastructure, including the built and natural environments, that enable physical activity and movement whilst also improving accessibility.

Stakeholders

Service users such as residents, NHS, schools, the voluntary sector, representatives from higher and further education (HE/FE), staff from Coventry City Council (CCC), its leisure facilities operator CV Life, Think Active (the active partnership for Coventry, Solihull, and Warwickshire) and the Positive Youth Foundation (PYF) may be indirectly impacted by the Strategy and its recommendations.

However, these groups have been engaged with throughout the strategy's development, contributing to the extensive research process and refining the strategy themes:

- Active System: Connecting Better
- Active People: Movement for Everyone
- Active Place: A Place of Movement

Facility operators will be impacted by the recommendations within the strategy which provide priorities around built and natural infrastructure improvements that meet the needs of residents based on local insight and evidence. Sports clubs, community groups, NHS, Schools, higher education and the voluntary sector could also be impacted by the strategy's recommendations around sport, physical activity and movement initiatives which could influence future provision and delivery priorities.

Responsibility

The Strategy Core Group, which was formed to develop the citywide Strategy, will be responsible for implementing its recommendations and its evaluation, as well as implementing the findings of this EIA.

The Strategy Core Group had representatives from CCC Sport and Public Health, CV Life (public leisure operator, Positive Youth Foundation (Coventry Youth Partnership) and Think Active (Active Partnership for Coventry, Solihull and Warwickshire).

To assess the impact of the Strategy, it is understood that first a baseline of data needs to be gathered. The below baseline information covers a range of data across the strategy and sports sector. Whilst this section provides an initial baseline of data, it should be acknowledged that by no means does this cover all the available data relating to the strategy.

The CCC Public Health team supported the Strategy's development process by obtaining insight data from the Active Lives Survey and Coventry Household Survey which acted as the baseline data. Key headlines included:

Coventry are more inactive compared to 15/16. There was a substantial improvement in activity levels for adults in 19/20 – possibly now taking longer to recover from pandemic compared to England.

The proportion of people in the most deprived group (NS SEC 6-8) who are inactive has increased substantially since 15/16, more than for England overall.

There are now a similar number of men as women who are inactive in Coventry. This differs to the national picture of men being more active.

Middle aged men and women (35-54 years) are the most inactive age group. This differs to England where 55-74 years are the most inactive group (excluding 75+).

Children are now more inactive than in England overall, but prior to the pandemic (18/19) levels appeared to be improving.

A significantly higher percentage of children are overweight/obese in year 6 compared to England overall.

A higher proportion of adults in Coventry have participated in recent active travel (walking) than for England overall, but this is not the case for children, for whom there is a substantially lower percentage active travelling than for England.

Household survey shows a slightly more positive picture – showing improvements in activity levels between 2018 and 2022.

Improvement in inactivity levels for 55–74-year-olds locally and nationally.

16–34-year-olds have become more inactive – similar to national picture, but to a larger extent in Coventry. More likely than other age groups to take part in more sport but are more sedentary on day-to-day basis.

Black British African Ethnic Group significantly more likely to be the most sedentary.

Higher percentage of people from Asian ethnic minority group are inactive compared to white British, but there is a larger difference in inactivity levels between Coventry and England for White British than for Asian ethnic minority group.

Inactivity levels for individuals with a disability have increased slightly in Coventry since 15/16 but decreased slightly for England.

In addition, the Strategy's findings and suggested actions were further informed by a significant public consultation process via a resident survey (Lets Talk Movement - LTM). The survey, which was commissioned by CCC, gained 1,398 responses, which is one of the highest engagements seen on any CCC public survey to date.

When asked as part of the LTM survey, residents who considered themselves not to be regularly physically active also told us that (amongst other barriers - see Appendix 1) their reasons for not taking part include:

- Unaffordability.
- Lack of motivation and;
- No-one to be active with.

Comments received as part of the LTM survey were centred around the following themes:

- Motivation
- Accessibility
- Specific locations
- More facilities / groups
- More facilities in parks
- Cheaper facilities
- Safety
- Female only
- More classes / online booking
- Cycling
- Older people / isolation
- Employers
- Promotion

When, as part of the LTM, residents were asked about what would motivate them to become active, they cited the following:

- Affordable access - to classes, memberships and transport, with flexible payment options and free or low-cost parking .

- Improved information - about local opportunities, with better promotion and signage.

- Inclusive provision - including women-only, disability-friendly, and culturally appropriate activities.

- More group activity in parks - including walking, running, and exercise sessions for people of all ages and abilities.

- Improved safety in parks and other outdoor environments - especially for women and vulnerable groups, through better lighting, visible security and well-maintained paths.

- Better facilities in parks and other public spaces - such as outdoor

gyms, pathways, benches, toilets, and inclusive equipment.

Enhanced connectivity - with safer walking/cycling routes and reliable public transport to parks and leisure venues.

Baseline data and information

Additional insight and data:

Social value and return on investment of sport and physical activity: Sport and physical activity contribute significantly to the health and wellbeing of England.

Sport England have calculated the annual social value of community sport and physical activity to be more than £120 billion, with a return on investment of £4.38 for every £1 spent.

This figure represents both primary value - the wellbeing benefits that individuals experience from being active - and secondary value, which reflects the cost savings to public services like healthcare.

Economic impact: Sport Satellite Account for the UK:

In addition to the social benefits, sport and physical activity makes a substantial contribution to the UK economy.

The latest Sport Satellite Account for the UK - with breakdowns for each home nation including England - presents the economic value of the sport sector for the year 2021.

This release, provided by the Department for Culture, Media & Sport (DCMS) in October 2024, examines the annual economic output, gross value added (GVA), and sport-related employment for the sector.

The overall value for the UK of £99.6bn, with the figure for England calculated to be £87bn, with a GVA of £46.7bn.

Indices of Multiple Deprivation 2019:

14.4% of LSOAs in Coventry are within IMD decile 1 – a measure of relative deprivation with quintile 1 being the most deprived.

Coventry's most recent Active Lives Survey (23/24) data highlights in the adult population, 28% of all adult's report as being inactive. In our most deprived neighbourhoods this figure rises to 36%, compared with 20% in our least deprived neighbourhoods. The same is broadly true for young people in the city, with levels of inactivity in the most deprived areas at 31% compared to 26% in the least deprived areas based on most recent available data from Academic Year 24/25.

Chief Medical Officer Physical Activity Guidelines 2019:

The UK Chief Medical Officers drew upon global evidence to present guidelines for different age groups, covering the volume, duration, frequency and type of physical activity required across the life course to achieve health benefits.

In children and young people, regular physical activity is associated with improved learning and attainment, better mental health and cardiovascular fitness, also contributing to healthy weight status. In adults, there is strong evidence to demonstrate the protective effect on physical activity on a range of many chronic conditions including coronary heart disease, obesity and type 2 diabetes, mental health problems and social isolation. Regular physical activity can deliver cost savings for the health and care system and has wider social benefits for individuals and communities.

The key factors for each age group are as follows:

Under-5s: This is broken down into infants, toddlers and pre-schoolers. Pre-schoolers and toddlers should spend at least 180 minutes (3 hours) per day in a variety of different exercises, whereas infants should be physically active several times every day in a variety of ways, including interactive floor-based activities.

Children and young people (5-18 years): Children and young people should engage in moderate-to-vigorous intensity physical activity for an average of at least 60 minutes per day across the week.

Adults (19-64 years): For good physical and mental health, adults should aim to be physically active every day. This could be 150 minutes of moderate exercise, 75 minutes of vigorous exercise or even shorter durations of very vigorous intensity activity, or a combination of moderate, vigorous and very vigorous intensity activity per week.

Older adults (65+): Older adults should participate in daily physical activity to gain health benefits, including maintenance of good physical and mental health, wellbeing, and social functioning. Each week older adults should aim to accumulate 150 minutes (two and a half hours) of moderate intensity aerobic activity.

It notes the emerging evidence base for the health benefits of performing very vigorous intensity activity performed in short bouts interspersed with periods of rest or recovery (high intensity interval exercise, HIIT). This interval exercise has clinically meaningful effects on fitness, body weight and insulin resistance and is incorporated in recommendations for adults.

It, thus, emphasises the importance of regular activity for people of all ages. It presents additional guidance on being active during pregnancy, after giving birth, and for disabled adults.

Importance of this data:

The above evidence highlights the significant impact of sport and physical activity provision both nationally and at a local level. As outlined in the data, a significant percentage of the Coventry population are not meeting the Chief Medical Officer's Physical Activity Guidelines (2019) to achieve physical and mental health outcomes. We also know that activity levels are lower in areas of higher deprivation, evidencing a need to tackle stubborn inequalities and remove barriers to participation. It is therefore a citywide key objective to improve the health and wellbeing of residents, as referenced in the Local Plan (2011-31).

Marmot Principles

1.	Give every child the best start in life
5.	Create and develop healthy and sustainable places and communities
6.	Strengthen the role and impact of ill health provision

Protected groups - Impact on Coventry Residents and Visitors

Age 0-18

Positive impact - This strategy aims to support the whole population in Coventry to be active. This means supporting all Coventry residents of all ages from all parts of the city to develop and maintain lifelong sport, physical activity and movement habits. Active Lives 24/25 data highlights that in Coventry, 24% of children report undertaking less than 30 minutes of physical activity per day, compared with a regional average of 29%.

The new strategy takes a holistic approach to enabling residents to move more, with a particular focus on those who experience the most barriers to activity. This will provide improved provision and built and natural environments that enable children and young people to develop positive experiences of sport and physical activity that can impact upon a lifetime of positive lifestyle choices

Positive impact - This strategy aims to support the whole population in Coventry to be active. This means supporting all Coventry residents of all ages from all parts of the city to develop and maintain lifelong sport, physical activity and movement habits.

Age 19-64

Currently, 23.7% of adults (aged 16-64) report undertaking less than 30 minutes activity per week, compared with 25.6% in the Region and 22.4% nationally (Active Lives 23/24). Consequently, a range of supported participation programmes and events are tailored to specific adult groups, demographics and for intergenerational appeal (e.g. Back to Netball, Walking Football, Men Talk). The strategy aims to support such programmes through a community-led place-based approach to physical activity and movement interventions, impacting positively for adults aged 19-64 through improved opportunities and infrastructure to enable active lives.

Positive impact - This strategy aims to support the whole population in Coventry to be active. This means supporting all Coventry residents of all ages from all parts of the city to develop and maintain lifelong sport, physical activity and movement habits.

Age 65+

Currently, 42.1% of Coventry residents over the age of 65 report being inactive (taking part in less than 30 mins of physical activity per week), compared with 36.5% regionally and 33.6% nationally (Active Lives 23/24).

Participation in sport and physical activity tends to reduce in older age groups, which can be associated with factors such as life-limiting illness and social isolation for some people. A range of supported participation programmes, activities and events in the city are tailored to specific adult groups for those aged 65+ and for intergenerational appeal (e.g. Dementia Active, Coventry Moves, Sporting Memories and inclusive age-appropriate physical activities).

Disability	Positive impact - The strategy aims to make sport, physical activity and movement inclusive and accessible for the whole population, particularly those that experience the biggest barriers to participation. Currently, 38.2% of adults in Coventry living with a disability or limiting health condition report undertaking less than 30 minutes of activity a week (compared to 22.7% of those without a disability). In the Region this figure rises to 43.3%, compared to a national average of 39.5% (Active Lives 23/24). The city also adopts the Disability Sports Charter, developed alongside the Disability Equality Action Partnership (DEAP), which sets out a range of commitments designed to improve the experience and opportunities for people with disabilities and their families in Coventry to access sporting and leisure activities in the city. Therefore, supporting such programmes, impacts positively for residents living with a disability.
Gender reassignment	No impact - Gender reassignment is currently an area of significant focus and changing practice amongst National Governing Bodies of sport (NGBs) - both in relation to participation and competition. Locally, there is currently no benchmark data available, though there have been positive provisions to reduce barriers to participation (e.g. gender-neutral changing facilities being central to design at public leisure centres and inclusive co-creation). There is insufficient data in this area to accurately assess impact at a local level. However, the strategy and any new facility development and sport, physical activity and movement initiatives aims to improve inclusivity and accessibility.
Marriage and civil partnership	No impact - There is insufficient local data in this area to draw meaningful conclusions around the impact on participation in sport.
Pregnancy and maternity	No impact - Active Lives Survey data does not highlight significant variance in inactivity for pregnant women or those with a child under the age of one. Positive practice locally encourages those pregnant or parents with young children to continue to be active (e.g. Coffee Tots now hosted at The Wave).

Positive impact - Barriers to participation linked to race are enduring and evident at a national and regional level. Accurate, interrogatable data at a local level is less easily regularly acquired due to necessary sample size. However, Active Lives Survey data (23/24) shows the overall participation rate (active for at least 150 minutes per week) in Coventry was 61.4%, slightly lower than the national average of 63.7%.

However, when broken down by ethnicity, (albeit the local data is limited with only data for three ethnic groups available) White Other (71.6%) and White British (62.8%) were more active compared with Asian adults (52%).

Race

The national picture, which has significantly more data available, revealed that only 54.7% of Asian adults and 56.4% of Black adults were active for at least 150 minutes per week, compared to 65.2% of White British adults and 66.9% of White Other adults, however the most active ethnic group was Mixed adults (71%). Moreover, the survey also showed that nationally, Asian, Black, Other Ethnic Origin and Chinese adults were more likely to be inactive, meaning they did less physical activity per week, than White and Mixed adults.

The inactivity rate for Asian adults was 33.3%, for Other Ethnic Origin adults was 29.3%, for Chinese adults was 27.7%, for Black adults was 30.5%, and for White British adults was 23.6% and 22.8% for White Other. These figures indicate that there is a significant gap in sport and physical activity participation between different ethnic groups nationally and locally, evidencing that some groups face greater barriers and challenges to engage in sport, physical activity and movement.

The new strategy aims to develop inclusive, accessible and sustainable opportunities and infrastructure to enable Coventry's diverse population to become more active through using resources available through the Place Based Expansion programme.

Religion and belief

No impact - There is insufficient local data in this area to draw meaningful conclusions around the impact on participation in and any required mitigations.

Sex

Positive impact - Active Lives Survey data does not highlight significant, consistent variance in inactivity for adult males and females. There are now a similar number of men (27%) as women (28%) who are inactive in Coventry (Active Lives 23/24). This differs to the national picture of men being more active.

Middle aged men and women (35-54 years) are also the most inactive age group. However, positive practice continues to ensure barriers to participation are addressed (e.g. single sex public leisure centre sessions) and this will be a focus area of the new strategy.

Sexual orientation

No impact - There is insufficient local data in this area to draw meaningful conclusions around the impact on participation in sport and any required mitigations.

Additional groups

Care experienced

No impact - There is insufficient local data in this area to draw meaningful conclusions around the impact on participation in sport.

Armed forces

No impact - There is insufficient local data in this area to draw meaningful conclusions around the impact on participation in sport.

Socio economic groups

Positive impact - Coventry's most recent Active Lives Survey (23/24) data highlights in the adult population, 28% of all adult's report as being inactive. In our most deprived neighbourhoods this figure rises to 36%, compared with 20% in our least deprived neighbourhoods. The same is broadly true for young people in the city, with levels of inactivity in the most deprived areas at 31% compared to 26% in the least deprived areas based on most recent available data from Academic Year 24/25.

The ambition of the strategy is to encourage more Coventry residents to move more often alongside providing opportunities to take part in more physical activity and sport. The key aim is to reduce health inequalities across the city by better supporting those who face the greatest barriers to being active.

Next steps

Inequality**Action****Owner Timescale**

A mixed methods approach will be taken to the evaluation of strategy themes and actions, emphasising the need for continuous learning, and the participation of residents in the process.

Qualitative approaches, including case study / story telling development will be most appropriate to explain how and why changes are happening within existing place based work such as Go Foleshill, Go Canley and Go Willenhall: projects whose stated outcomes are to build trust amongst residents and to secure community engagement beyond their initial grant funding. This learning will inform the extension of place-based work in other parts of the city, especially linked to Sport England place-based expansion investment.

Bespoke approaches will be adopted to test and learn about new interventions in specific environments, such as workplace physical activity.

Quantitative data such as the demographic profile of use within CV Life venues and taking part in outreach activities will also be collected via Go CV and used alongside national data such as Active Lives and Moving Communities. This element of evaluation will be critical to tracking strategy impact in respect of 'moving the dial' and broadening engagement in physical activity across all demographic groups in the city – with a particular emphasis on those experiencing the greatest inequalities.

Monitor and evaluation

As an emerging Sport England place partnership area, the lead agencies in Coventry will adopt the nine National Learning and Evaluation Partnership (NELP) conditions for change listed below as part of their ongoing impact evaluation of this strategy. This will build on the test and learn approach to date within Coventry that has seen a significant shift in supporting the national process in developing the System Maturity Matrix and will be part of the place-based expansion work.

The nine conditions for change are:

Process for Identifying the barriers and enablers of physical activity.

Organisational policies, processes, and structures that enable place-based working.

Capacity and capability across the workforce, volunteers and communities.

Collaboration.

Leadership.

Community-led action.

Cultures and practices for physical activity

cultures and practices for physical activity.

Built and natural environments that enable physical activity.

Cycles of learning and action.

Impact on Council staff

**Will there be an
impact?** No

Completion statement

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

Let's Talk *Movement*

Tell us how we
can help you
move more



Your say.
Your way. Your move.



Coventry City Council

'Let's Talk Movement' Survey
Final Report

2025
Page 255

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Executive Summary

- 1398 surveys were completed
- 85% of respondents consider themselves to be active
- 12% of females compared to 9% of males do not consider themselves physically active.
- 31% of those that state they are disabled compared to 8% of those that state they are not disabled do not consider themselves physically active.
- In terms of ethnicity 11% of white respondents, 16% of black/black British and 18% of Asian/Asian British do not consider themselves physically active.
- In terms of age 96% of under 24 year olds consider themselves physically active, this falls to 84% of those aged over 75. 93% of those aged 65-74 and those aged 35-44 consider themselves physically active.
- The most popular forms of physical activity are walking/wheeling moderately and fast as well as strenuous housework.
- Other forms of activity mentioned were sports such as badminton/golf/tennis/ice skating/lawn bowls as well as dog walking.
- Most respondents are happy with the amount of activity they do.
- For those that do not do as much as they would like say, time is the biggest issue, followed by lack of motivation. Tiredness as well as affordability were also mentioned a lot.
- For those that do not consider they do regular physical activity, motivation and affordability were the biggest barriers alongside not having anyone to do it with as well as too tired.
- 64% of respondents are signed up to Go CV
- Key themes from the open ended question, what would help you move more:
 - **More group activities** in parks, including walking, running, and exercise sessions for all ages and abilities.
 - **Improved safety**, especially for women and vulnerable groups, through better lighting, visible security, and well-maintained paths.
 - **Affordable access** to classes, memberships, and transport, with flexible payment options and free or low-cost parking.
 - **Better facilities** in parks—such as outdoor gyms, benches, toilets, and inclusive equipment—across all neighbourhoods.
 - **Inclusive provision**, including women-only, disability-friendly, and culturally appropriate activities.
 - **Improved information** about local opportunities, with better promotion and signage.
 - **Enhanced connectivity**, with safer walking/cycling routes and reliable public transport to parks and leisure venues.

- Respondents profile
 - Responses were received from all areas of the city
 - 35% of respondents were aged under 24 age, 5% aged over 75 years of age
 - 62% of respondents were female
 - 14% of respondents considered themselves to be disabled
 - 78% of respondents were white, 11% Asian/Asian British and 5% black/black British

Methodology

Let's Talk Coventry with information and survey

An online survey was hosted on Let's Talk Coventry from 7 October until 9 November.

Online/email

- Launch video with Councillor Kamran Caan – Facebook, Instagram and Tik Tok
- Two additional videos on Facebook, Instagram and Tik Tok
- Council intranet – posted on round-up three times, with a banner up for two weeks
- Gov Delivery email with survey link to Go CV (twice), Your Coventry, Let's Talk and Sport databases
- Emails sent to over 200 voluntary, community and special interest groups in the city, including information about the survey and a link to it, with a request to share with their audiences

Partners

- Sent toolkit with posters, social media and email examples
- Shared on their social media channels and to groups
- Worked with their own groups to complete the survey

Outreach

- EnV Coventry used to carry out 15 outreach sessions at various locations in the city helping people complete the survey
- Two outreach sessions at the Coventry City Football Club Fanzone at home games. Alongside this there was information in the matchday programme and on the scoreboard
- Posters and information delivered to all Coventry Libraries and Family Hubs and other community buildings
- Information on screens at Council buildings and at Ricoh Arena

Response Rate

2,800 people were aware(landed on the page), 1,700 were informed (watched a video/read a document) and 1,398 were engaged (completed a survey)

1,398 responses were received.

Findings

Do you consider yourself to be physically active?

By this we mean at least 10 minutes of movement that adds up to at least 30 minutes a week.

	Number	%
Yes	1180	85%
No	150	11%
Not sure	64	5%

85% of respondents consider themselves to be physically active with just over 1 in 10 considering themselves not to be physically active.

Differences by equality groups:

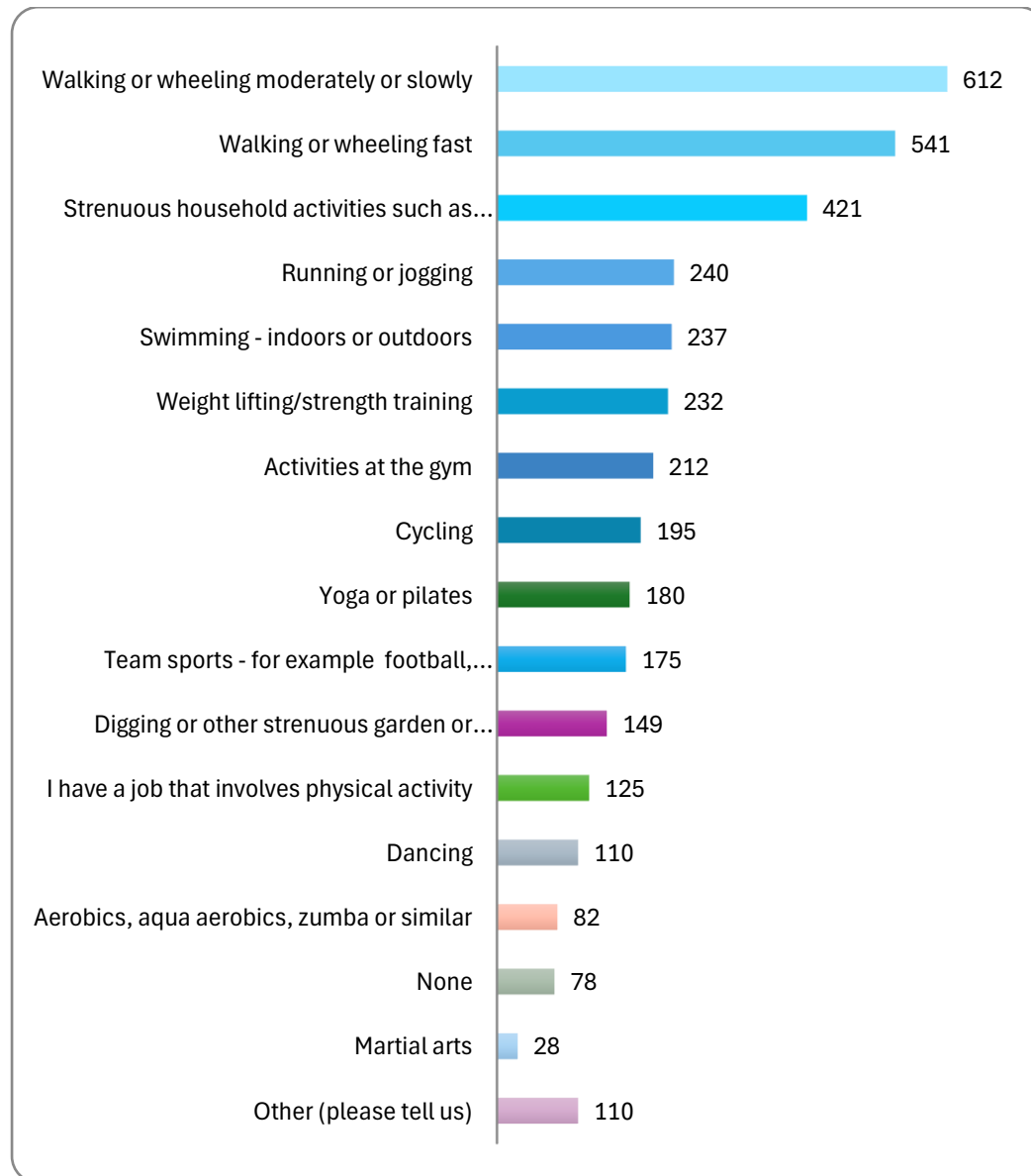
12% of females compared to 9% of males do not consider themselves physically active.

31% of those that state they are disabled compared to 8% of those that state they are not disabled do not consider themselves physically active.

In terms of ethnicity 11% of white respondents, 16% of black/black British and 18% of Asian/Asian British do not consider themselves physically active.

In terms of age 96% of under 24 year olds consider themselves physically active, this falls to 84% of those aged over 75. 93% of those aged 65-74 and those aged 35-44 consider themselves physically active.

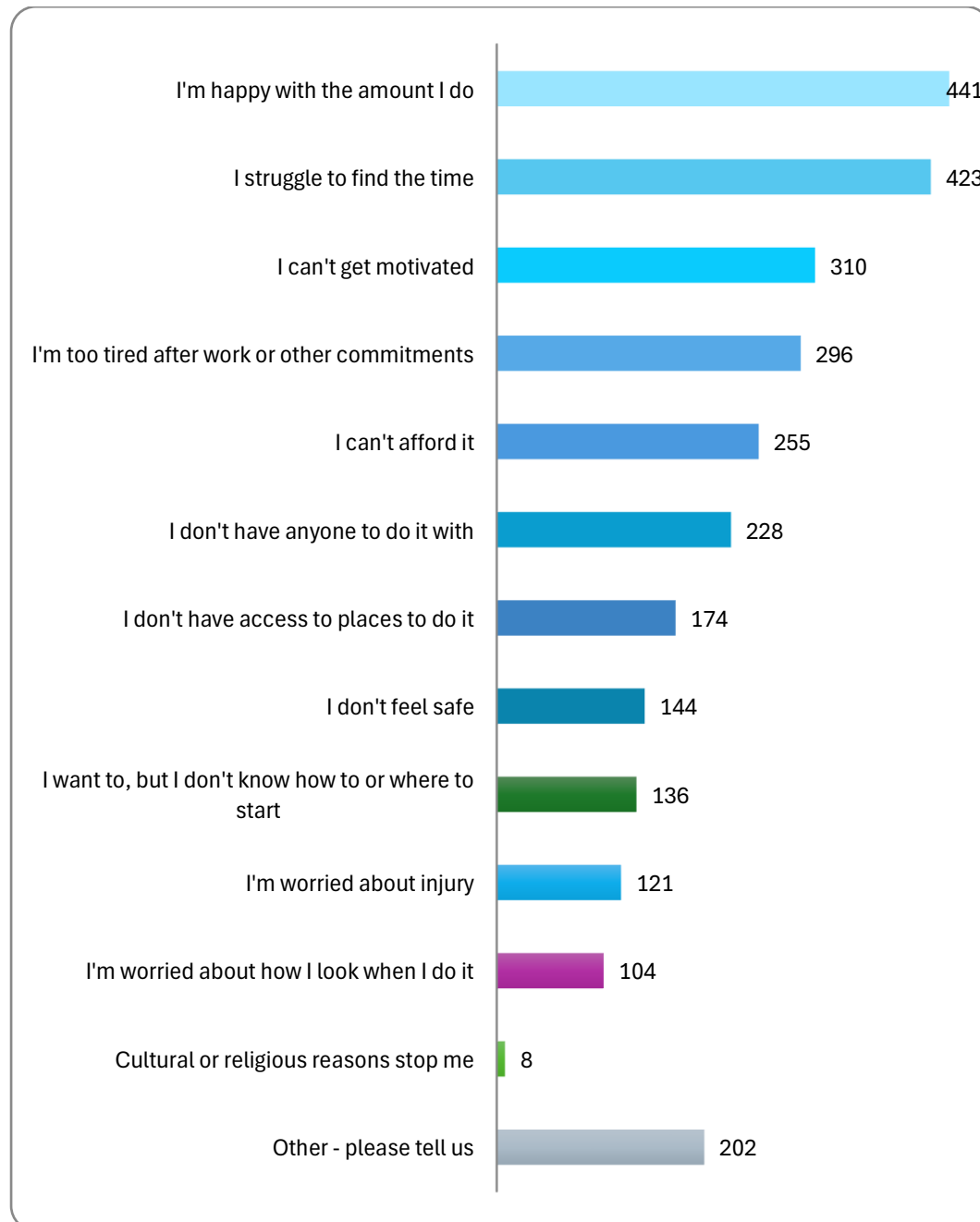
What type of physical activity do you do?



The most popular forms of physical activity are walking/wheeling moderately and fast as well as strenuous housework.

A lot of the other forms of activity mentioned were sports such as badminton/golf/tennis/ice skating/lawn bowls as well as dog walking.

What stops you being active or more active?



Most respondents are happy with the amount of activity they do. For those that do not do as much as they would like say, time is the biggest issue, followed by lack of motivation. Tiredness as well as affordability were also mentioned a lot.

For those that do not consider they do regular physical activity, motivation and affordability were the biggest barriers alongside not having anyone to do it with as well as too tired.

Are you signed up to Go CV?

	Number	%
Yes	889	64%
No	406	29%
Not sure	98	7%

Just under two thirds of respondents are signed up to Go CV, this is the same number as those that are not physically active.

There are no differences between the profiles of respondents who are signed up compared with those who are not signed up.

What could we do to help you move more?

Think about things like safe accessible places, support on how/what to do, informal and formal facilities, your local area etc. Please be specific about locations - e.g name of park or road, local area.

All the comments were manually themed, one comment might contain several themes.

A full list of open ended comments can be found in Appendix a.

Theme	Number
Specific Locations	178
More facilities/Groups	132
Accessibility	125
Affordability	123
Leisure, Sports, and Exercise Opportunities	100
Improved and extended facilities in parks	95
Safety	93
Inclusive and Targeted Provision	83
Public Transport and Connectivity	64
Nothing	50
Employers	18
Motivation	9
Promotion	3

A number of specific locations were mentioned. Primarily parks, with repeated mentions of Longford Park, War Memorial Park, Allesley Park, Coundon Park,

Coundon Wedge, Caludon Park, and Hearsall Common. Areas that were repeatedly mentioned were Foleshill, Binley, Tile Hill and Wyken Slough

Also references to roads like Allesley Old Road, Banner Lane, Broad Lane, and community centres like Cheylesmore Community Centre, Alan Higgs Centre.

More Facilities/Groups

Strong demand for more walking, running, and exercise groups in local parks, especially in areas where these are currently lacking (e.g., Hillfields, Foleshill, Memorial Park, Longford Park).

Requests for organised group activities for all ages and abilities, including beginners, older adults, and families. Suggestions for community-led sessions, buddy schemes, and better promotion of existing groups and events. People want more opportunities for group activities, social sports, and community events to foster connection and motivation.

Accessibility and Affordability

Cost is a significant barrier: requests for cheaper classes, discounted memberships, free or flexible parking, and affordable public transport. More flexible payment options and reduced costs are needed to increase participation.

Poor or unreliable bus connections to parks, leisure centres, and sports venues. High costs and safety concerns on public transport, especially for elderly and disabled users.

Some areas lack direct routes to key destinations.

Leisure, Sports, and Exercise Opportunities

Limited affordable, accessible, and inclusive exercise classes (especially for over-50s, disabled people, and those with long-term conditions). Lack of evening/weekend sessions and “turn up and play” options for sports like badminton. Difficulty booking facilities (lack of online booking, limited availability). Provide more inclusive and disability-friendly sessions and equipment.

Improved and Expanded Facilities in Parks

Calls for more and better-maintained exercise equipment (e.g., outdoor gyms, calisthenics stations, benches, lighting, toilets) in parks across the city, not just in the city centre. Specific requests for new or improved tennis courts, pump tracks, playgrounds, and hard-standing footpaths to make parks accessible year-round.

Memorial Park: More group activities, improved gym equipment, better lighting, extended car park and toilet opening hours, and additional playgrounds.

Longford Park: Tennis courts, group activities, benches, and improved safety.

Allesley Park: Outdoor gym equipment, lighting, and enclosed dog exercise areas.

Safety

Safety is the top concern, especially for women and vulnerable groups. Poor lighting, off-lead dogs, and anti-social behaviour deter park and street use, particularly after dark. Concerns about crime, anti-social behaviour, and lack of visible policing in some areas.

There is a strong call for better lighting, visible policing, and safer, well-maintained paths in parks and public spaces

Inclusive and Targeted Provision

Women want safer parks and public spaces, especially for walking, running, and early morning or evening activities. Better lighting, visible security, and safe routes are repeatedly requested. Female-Only Facilities and Sessions: There is strong demand for more women-only gyms, swimming sessions, exercise classes, and weight training—at convenient times and in accessible locations.

Cultural and Community Inclusion: South Asian Muslim women and other groups want more culturally appropriate, female-only activities and spaces. Flexible timings and local provision are important for those with work or family commitments.

Older adults in Coventry want affordable, accessible, and varied opportunities to be active; better local facilities and infrastructure; more social and supportive group activities; and clear information about what's available. Addressing these needs will help reduce isolation, improve health, and support active ageing.

Requests for disability-friendly and SEND-friendly activities, and quiet times for people with specific needs. More activities and facilities for children, young people, and families, including sports events and play areas.

Public Transport and Connectivity

Barriers: Poor or unreliable bus connections to parks, leisure centres, and sports venues. High costs and safety concerns on public transport, especially for elderly and disabled users.

Some areas lack direct routes to key destinations.

Incomplete or unsafe cycle routes (especially for families and less confident cyclists). Pavement parking, uneven or blocked footpaths, and poor lighting deter walking and running.

Lack of safe crossings and traffic-calming measures near parks and busy roads.

Create continuous, protected cycle routes connecting neighbourhoods to the city centre and key destinations. Improve and maintain footpaths, add more drop kerbs, and address pavement parking.

Employers

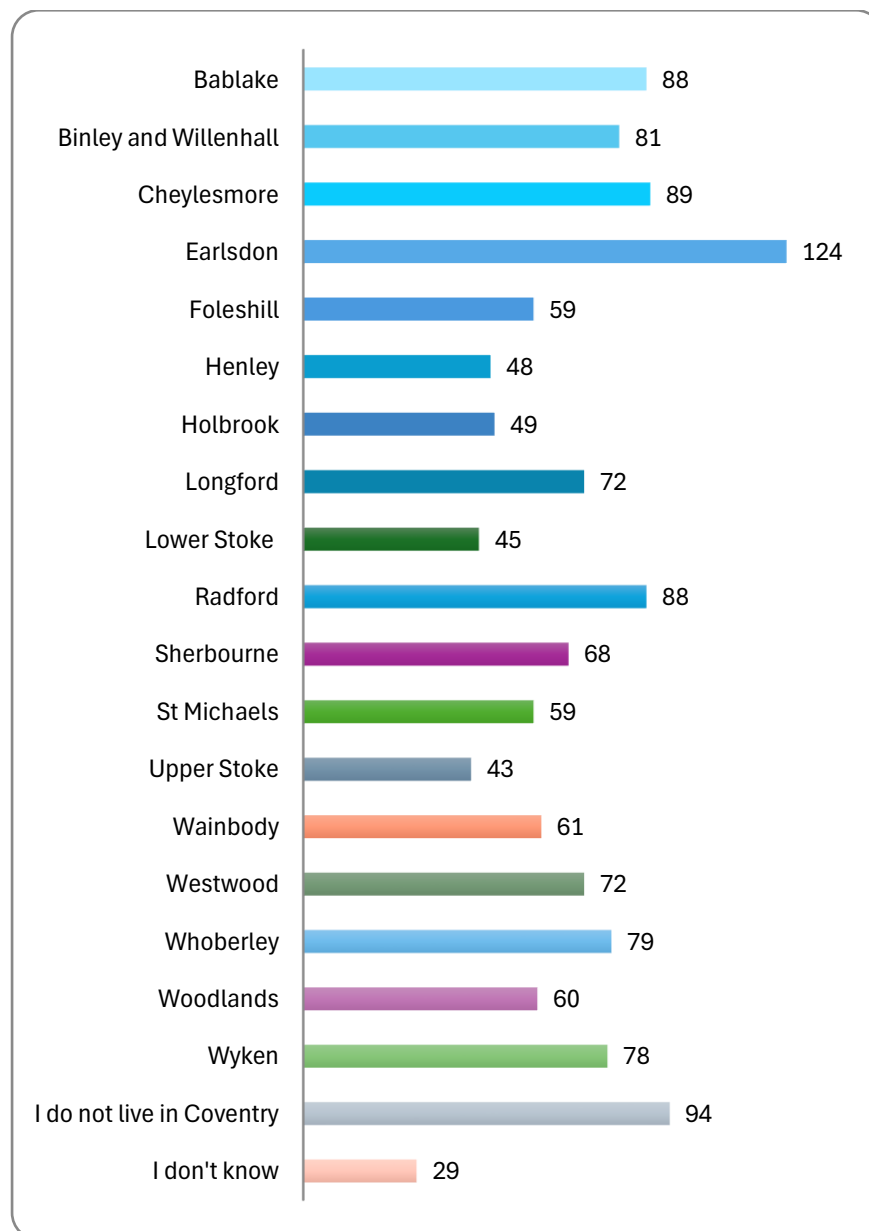
Workplace and Flexible Options: interest in workplace-based movement initiatives: Standing desks, walking pads, yoga sessions at work. Flexible working schemes to allow time for physical activity.

Promotion

Residents need better information about local activities, routes, and facilities—improved signage, council website updates, and use of social media and local magazines. Calls for the council to promote running clubs, park runs, and other free or low-cost activities, and to support people of all abilities

Profile of Respondents

Which area of Coventry you live in?



Responses were received from across the whole city.

What age group are you in?

Age	Number	%	Citywide Census
Under 16	96	7%	20%
16-24	81	6%	15%
25-34	118	8%	15%
35-44	215	15%	13%
45-54	231	17%	12%
55-64	244	18%	10%
65-74	292	21%	8%
75-84	105	8%	5%
85 or over	9	1%	2%

How would you describe yourself?

Sex	Number	%	Citywide Census
Male	501	36%	50.10%
Female	867	62%	49.90%
In another way	9	1%	-
Prefer not to say	13	1%	-

Do you consider yourself to be a disabled person?

Sex	Number	%	Citywide Census
Yes	195	14%	18%
No	1189	86%	82%

Which of the following best describes your ethnic background?

Ethnicity (short)	Number	%	Citywide Census
Asian/Asian British	152	11%	19%
Black/African/Caribbean/Black British	65	5%	9%
Mixed/Multiple Ethnic Group	32	2%	3%
Other Ethnic Group	21	2%	4%
Prefer not to say	35	3%	N/A
White	1085	78%	65.50%

Appendix a

All comments as they have been made

- More motivation
- Nothing
- Nothing
- Make sure public transport is accessible
- More facilities in my local area
- Coundon Park, The wedge
- More local facilities
- Nothing
- Safe running areas
- Keep fit facilities made cheaper
- not many gender safe spaces in coventry, this is advertised however it is not followed through with strict policies
- More walking groups in local parks. The Memorial Park is my local park.
- Put more exercise activities on in local park areas where groups can come together
- Easy booking online.
- Keep a check on the prices and ask them to keep it reasonable and come up with yearly/monthly membership for regular customers
- We need free leisure centre access for Coventry residents similar to Birmingham council scheme
- Swimming and yoga classes locally
- Maintain the WMP tennis courts more often considering we pay to use them
- Oldfield Road - I would love for there to be full (i.e complete) cycle routes from Allesley Old Road to the city centre and the surrounding areas. I am not a confident cyclist on the road and am currently not confident cycling with my 9 and 12 year old on the road with the cars. If there was a complete cycle routes from one destination to another we would happily cycle everywhere.
- Keep fit for retired people
- "Gyms in Coventry can feel unsafe as a woman, I've had men record me, spaces like this would benefit from staffing to protect safety of users
- Also a low cost option would be beneficial"
- "Organising for local groups in parts of the city (especially places like Hillfields and Foleshill), promoting and showing routes around the city.
- Groups in local parks in areas where they aren't available.
- Functioning facilities that can be used in local parks that have equipment to clean and maintain them"
- Have over 50s group Exercise sessions (ie walking football) in the evenings NOT when the majority of people are at work.
- "Cheaper gym membership.
- More gym equipment at the memorial park"
- Informal, free facilities for pensioners in various locations
- Work- standing desk/walking pad to get steps in at work

- "Invest in green spaces around the city not just the city centre. Like we have family hubs, I would love to see 'Green Hubs' across the city that people can access and have activities to do. We have great pockets of work but need a more collective approach.
- If I gave you an example - A place in the city to do a 5k. A signed route around a park that has markers 1k, 2k, 3k, 4k, 5k that motivate people to run more or cover distance.
- Cycling - It would be great to have a City based cycle hub. This could be developed in a park area with a go to designated area for cycling and become the heart of cycling for the city. "
- Nothing
- We need more facilities. Safe spaces at the park , I feel park is nit safe with lots of dogs without lead.
- Free swimming lessons and other exercise classes for female only to make us feel more comfortable
- More affordable places, also more workout classes available l'm evenings
- Tennis court in longford park would be a great addition to current facilities as there is nothing available in this part of the city
- I am on Woodend area ,ther is Moathouse Lesure Centre but it dos not have activity what I would prefer ,in afterword hours
- Alan Higgs, excel and Moat house
- I find groups quite expensive and need to pay for more essential things. Also by the time im home from work im far to tiered.
- More classes through the leisure centres at times that suit me, being able to book classes at the leisure centre more than a week in advance, more activities that are relatively low impact like yoga.
- Bring back Pensioner concessions.
- Safer places in CV2 area, better lighting, free facilities
- Provide more safe walks for women in Foleshill, taking into consideration there are women who have work commitments too, make edgewick park a safer place for early morning walks.
- Free online classes that I can do at home but with a live instructor to hold me accountable
- Coventry needs a bmx pump track, we are behind so many towns in this
- Build Padel courts
- "Costs are too high, look how much it is to take a family of 4 to the wave
- Facilities taken away like the sports hall at the old baths
- Bike lanes some are so badly done take the new one that goes on to the London road. If you heading towards cheylsmore it it makes you cross the road to the wrong side than you end up on the wrong side of the road with now are to cross except at a busy roundabout with no drop curb
- Driver's in cov are dangerous making cycling thing a big gamble every ride. Once you are out of cov the drivers are so mute respectful.
- No indoor skate park take every other city around the size of cov and they have one. I travel miles to skate, the one in the memorial park is in serious need of reservation.
- Locking a bike up in cov centre is a gamble, will I still have a bike? Give us some safe bike storage.
- Bike crossings with lights actually take longer to use than normal crossing,
- Free sport trial sessions for people my age
- Engaging me to mingle with people and participate in sports activities.
- Family swimming all day at the Alan Higgs during school holidays. Currently it's on for one hour a day and tickets are either sold early by staff or you have to stand in a queue for half an hour before the session. If you don't get a ticket that's your chance gone to swim in the city as all the go Cv pools run it in the same hour. Also booking adult swimming and sauna. People sit in the sauna for hours blocking it for others.

- Better local facilities around the hillfields area such as better facilities in the local parks for children where it is not taken over by antisocial behaviour.
- Make it cheaper
- Have a go sessions to find something you enjoy
- If there were discounted schemes or free taster sessions that would help. It is hard to invest the very little money I have into an expensive activity when I don't even know if I'd enjoy it enough to continue.
- Affordable places to go for swimming, yoga etc
- Have no dog / animals days of times at big parks like memorial or coombe abbey so people don't feel afraid to go and have to keep looking if dogs are on a lead or even being controlled by the owners
- "More safer roads for cycling particularly foreshill road.
- if more people are cycling then I'll feel more comfortable doing it."
- "Cheap/free access to classes for older people - tai chi in the park same model as park run
- Memorial park "
- More organised activities than just running. Concessions for pensioners at sports facilities.
- "When I take my toddler to the park, the play equipment is damaged and unsafe for my little one to play on especially in bell green park. It needs safer equipment and refurbishment. There are nails poking out of it.
- I don't feel children are safe in play grounds and skate parks. Older children routinely terrorise and don't give them enough room to ride their bikes. At times they have even misbehaved with the adults and used slurs against the adults. Which makes the play areas unsafe for both adults and children. This incident has taken place in Longford and bell green park. "
- Access to therapeutic swimming and walking for those who are older, recovering from injury or illness. There used to be special classes for this but they don't seem to exist any more.
- Information on ideas to incorporate moving into work - e.g encouraging walking a lap round the office floor every hour, taking the stairs instead of the lift or ways to set up something like a staff yoga session once a week.
- More green spaces within Coventry
- Encourage more facilities to have childcare and offer parent and child classes. Lots of gyms have moved away from the creche model
- A joined up cycle network with clear signage and online support so I know where to get on the cycle paths before I make the journey, or someone who could accompany me when I cycle a new route. And also fewer cars on the road, especially SUVs.
- "better cycling network within city - new cycle facilities are great, but there are issues at end of routes, or between eg roads, parks etc, and existing facilities are not kept maintained and swept to the standard of roads. Lack of secure cycle parking facilities at key locations - city centre, retail parks, sports facilities.
- example being the wide path in war memorial park used by many cyclists, including many students travelling between earlsdon and finham park school, with very narrow link at end of path to coat of arms bridge road, with conflict between cyclists, walkers and dogs"
- Family inclusive activities where children are welcome. I am a single parent so I am limited to how much physical activity I can do around looking after my child.
- "I like to run outdoors but it doesn't always feel safe, especially in the evening or winter months, even in Binley Woods where I know many people and am part of the running group.
- I can't afford to pay expensive gym membership so I joined pure gym. I found the induction didn't tell me how to safely and effectively use the weight machines and whenever I attended I had to wait/queue to get to use the equipment.

- My job, working for the council, is desk based which means I am not as active in the day as I want to be. I don't feel I can take movement breaks due to the workload which needs to be completed."
- There is a green area on Jardine Cres which would be ideal for group activity plus a hard court area.
- More facilities locally and at an affordable price.
- More access to health spa facilities
- Improved segregated cycling infrastructure in my local area - eastern green, mount nod, alleseley
- More cycle lanes!! And making cycle lanes better linked up and ensuring cars aren't using them to park or drive in
- "It's ironic that as a council you are promoting being more active, yet you are charging significantly high prices for the use of council gyms.
- For example, I would like to use my local council, at 7 in bell green. I work in a minimum pay job with a family, I can't afford the £42 charge per month, indeed locally there are gyms that from £20 upwards.
- The fact there are other activities like swimming or sauna which I don't use, yet I still have to pay the full price.
- Stop talking about these things and make them accessible to people like me, as they certainly aren't currently."
- Cheaper memberships for gyms
- "Bring back the assisted movement machines as said above. None in the local area and these are excellent for disabled and those with limited mobility.
- More classes for beginners such as Pilates. Rarely anything and all geared to those already fit and active. Some already for older people but young people can be unfit and get tired easily too and have mobility issues "
- Parking near Spencer park is all permit holders. There is only space for about 4-5 cars.
- More cycle lanes
- "I wish the war memorial park was well lit at night as I could take my dog for a walk safely, instead in winter I do a much shorter pavement walk on the street because I don't feel safe.
- Group activity Longford Park
- For one of the car parks at Longford Park to stay open longer in the evenings mid-week (Mon-Fri) for the running groups, mainly ladies to park closer rather than on the streets.
- More flexible participation plans.
- More affordable places
- Yes
- Local groups with people to help exercise but to feel less isolated. Activities that are enjoyable and that people can join in and at their own pace
- "Ensure the car parking at parks and green spaces remain free for 3 hours.
- Give away good bicycles from the ones discarded at the tip to worthy individuals. Maintain above bikes by giving skills to long term unemployed to check and make good bikes."
- More hard standing footpaths in parks - park wood, canley, the shrubberies to connect to the circular route in gibbet hill wood. Calisthenics equipment, table tennis tables (and more play equipment for older children in Prior Deram park). Coventry needs pump tracks - my kids love these on holiday but there is nothing locally. Play trail round perimeter loop of War Memorial Park so hard to get kids to walk a lap ATM - probably should be additional playground near Stivichall Primary
- Not enough green spaces. Lots of new houses built in the areas I used to exercise in Hawkesbury Village
- Nothing thank you

- Safe crossing from wilsons lane to longford park. Traffic lights or a zebra crossing so I can get there safely, it's a lovely park but hard to access without risking my safety. Also cheaper parking so when you go to the city centre for a one hr yoga class you always have to pay 2 hours and it makes everything more expensive and puts me off
- Have supported sessions and people at each location who are trained working with people who have health conditions
- Re-evaluate routes for public transport to and from key sports venues and leisure centres to maximise ability to reach these at times which are appropriate for that centres offerings
- Live near Coundon Hall park and since new path was put in I have noticed a huge increase in people using park which is great. The paths ensure we can access the park in winter when previously walking on the grass was boggy and slippy. The new lights and extra bins also lengthen times we can walk and better for dog walkers too. A place to grab a drink would be great- parents use car park at drop off and pick up times from school so would be popular at those times too. Parking needs to remain free here and at other local parks such as Allesley and War Memorial Park. Why are there barriers at Allesley?
- Accessible bicycles for use at Coundon Hall Park would be nice in the future.
- I can't think if anything, because I am lucky to live near the memorial park. I run around it 4 to 5 times per week. If I lived somewhere else though, I would definitely struggle because running just on the streets of Cov isn't very motivating.
- I am part of a ladies running/walking group and we regularly meet at Longford Park - it would be useful if one of the car parks could stay only a little longer during the autumn and winter months
- I have just started using Longford park for running and recently I encountered a situation and I didn't feel safe. Need better lighting and better parking.
- Public footpaths are useless, swimming is expensive and parks are a crime scene.
- I informally lead a fun running group for a small group of friends and we regularly meet in Longford Park - which is great for all of us and is a lovely park to meet up in. However, this time of year the car park closes early which means we have to park on the adjacent road (Windmill Road) which isn't safe or practical. It would be great if the car park could stay open until 7 / 7.30pm to allow us to meet up and leave safely. It would also be great if we could advertise our group on the noticeboard in the park - but as we're not 'official' that's not allowed and it would also be helpful to have access to the toilets in the park. Finally, it would be great to have the Magic Mile feet repainted.
- free classes or facilities in centre of town
- Infrastructure in Coventry city centre to safely cycle. Access to affordable or free bodies of water (indoor, outdoor), pleasant areas for walking - see Europe
- Public transport to the Alan Higgs Sports Centre - Allard Way
- Caludon park is my nearest park, However it has great facilities, but too much anti-social behaviour
- "Parks and quite roads don't feel safe. Ensure there are enough working street lights.
- Bike lanes that stop.
- A couple of years ago there was a bike festival, we started at the mill pool and rode to charterhouse, it was an excellent day! Please let this become an annual event. Q"
- Free swimming for older women.
- Suggestions for walking routes in the city with points of interest
- More access to cheaper facilities
- 4 day work week.
- I live off browns lane so there is no park just a brief walk away it's all road walking. To access a green space like Coundon wedge I have to drive to it.

- There is already one 5k Parkrun in Coventry, but with over 700 participants each Saturday morning it would encourage others if there was another.
- Better gym access in Walsgrave
- Cheaper gym memberships
- I would like to see more activities for the elder person.
- Central Swimming baths in Coventry where they had Olympic pool size
- Swimming looking at different time for adults as when lessons are over it very late
- More chair exercise activities offered
- Support local communities to get out more into the urban environment. Ensure our parks & canals are safe places to walk. I lead urban walks & would love council support visit www.gyc.org.uk to find out how you can help us over 50/55's too
- More green space in the city because the offering is incredibly limited.
- Gym for older people
- "If my walk to work was more attractive - allesley old road and Spon end into town.
- Guided walking route around town for lunch break walks."
- Allesley park doesn't have any equipment like in memorial park. Maybe that would motivate me more
- N/A.
- More street lighting for evening walks in Coundon area, along Barker Butts Road, especially along the bike lane.
- Women only gyms
- Provide more services at foleshill community centre such as yoga low impact exercises on weekends or evenings 7pm onwards.
- Radford common
- Poor bus connections to Bannerbrook make it hard to get to places like Excel leisure centre or University of Warwick Sports Centre. Routes either don't exist or are so unreliable they can't be depended on for getting to activities that start at a set time in the evenings.
- Other dogs off lead and looking to fight, weirdo's hanging around or in Willenhall Woods, flytipping causing access problems to Willenhall woods.
- Maybe discounted gym memberships, I keep meaning to get one but 40£ a month feels like too much. It is getting to winter now so my daily walks are slowly stopping and my motivation is gone.
- I live close to the memorial park and I love going to run there but sometimes if it's dark I'd rather stay in because of consciousness on crime
- A running track
- safer light up areas of the park (memorial) some arranged activities to do in groups ie walking club
- There are a lot of people who use the War Memorial Park or Hearsall Common for sports like Gaelic and Flag Football, but these spaces are not always maintained.
- Physical Exercise events . like strength training sessions or bicycle marathon
- Gym subscriptions and activities day in the office
- Park runs for free in local areas.
- Make more places available with equipment. I've seen some parks have equipment. If adding some more safe equipment could help. Edgewick Park is an example for this.
- Nothing
- I like commuting through walking by the Coventry canal which is relatively unsafe, especially for bikers/when there are bikers. Something to help prevent falling off the ledges would be helpful

- More connected cycle paths that connect all areas of Coventry and neighbouring towns. e.g. Walsgrave to Wyken to Coventry University to Warwick and even Leamington Spa etc.
- Free bicycle
- Team to do it together
- non applies
- I wish to do more active sport activities and help younger people in that direction the needed assistant i can give on their grooming stage
- I need to be engaged and trained during my free time
- "The parks could be more lit up in the evenings. Went to the memorial and there are some very dark parts now the darker evenings are drawing it.
- Organize local football matches
- More time creation
- Gos ford park
- More classes available during school times, groups being set up in local areas to help support those who want to get fit.
- Free gym passes for older people
- Promote participation clubs. We get plenty of leaflets and emails about the local pizza place but none about joining a badminton session for example
- Gym subscription
- More gyms and football pitches around cv6 6jf
- I don't feel safe walking through Willenhall, binley and other parts of Coventry so I only go out when I need too
- Longford park has fitness equipment, playground and cages for football and basketball
- Local cricket match would be good
- Part time job with full time pay? 🤖
- Increase how safe I feel in my local park, it has good sport facilities but is used by people who do drugs making it unsafe. My local park is bridgeman road nauls mill.
- Having more money
- Please if you could organise free aerobic/dancing/yoga/pilates sessions online or around Stoney Stanton Road, I would be grateful and definitely to join!
- Free or low cost courses for things which enable more movement eg Yoga, Pilates stretching exercises
- Group female walks in more areas.
- "Put lights up in Allesley Park to make it accessible in early mornings and late afternoons
- Have outdoor gym equipment installed in Allesley Park, Coundon Park, Juniper Park"
- "Mention whether parks around Coventry are public or private parks.
- List places students can visit in the internet or Google maps.
- Make YouTube videos guiding how and where to visit. This might motivate students to explore the area."
- Cheaper gym memberships at CV life, mum and toddler activities for fitness, using empty shop fronts as community gyms or places where you can get fit with things like table tennis like I've seen in other cities
- More free or low cost activities at memorial park
- I really love netball and I attend a friendly non competitive group, that isn't in a league. I really enjoy the fact that there's no pressure and it is just for fun. There isn't another group like this in the city, it would be great to have more groups like this for netball, but also for other sports, as most groups

like this are competitive and have the purpose of winning and with that comes pressure. I would imagine that for people who struggle with mental health or have confidence problems will find it harder to join a competitive group. plus its flexible, so no commitment if you can't make it one week.

- Free football camp
- "more beautiful green spaces (not incl. childrens park), websters park behind broad heath school used to be an amazing space, but ripped up for new housing development - lost a valuable green lung in a low income area with poor health outcomes, much more smaller compared to how it was and now lots of loitering of residents from new estate - so not safe for walking, running etc.
- better routes to access canal - again great to have a nice canal path in north of city, but access routes are poor (thinking of the one on foleshill road by tower court/sutherland house) - narrow staircase and leads you onto path by the bridge - can be quite off putting
- better control/restrictions on pavement parking - a massive issues across Foleshill, but on stoney stanton road and foleshill road in particular, two major parallel artery roads well suited to making circular walking routes - creating street scenery that blocks cars from mounting pavements - bushes, small wooden posts (such as the ones alongside kenilworth road near to park), grassy embankments, then walkers/runners will feel less like cars are on top of them so safer when walking/running and to stop cars from parking on pavements.
- Fitness facilities in parks 🏋️ around CV24, for pull-up, sit-ups let's move! Sport is life! Cutting grass on football pitch!
- Have more free open places to encourage exercise and physical activities.
- In regards of where I live - I would love to go out for a walk more by myself or with a friend but feel there aren't areas which are beautiful or well looked after or in a 'good' area (definition for me of feeling safe). For example I don't live far from the swan pond at the Stoke Flood Greens and there is some sort of foot path going along the marsh but I wouldn't go back there on my own. I think there could be more well kept paths where it is more inviting for people to go and walk and enjoy the green space. Also, there could be a foot path connecting with a little bridge over the Sowe River to connect to Clifford Bridge Rd for example.
- I will be grateful if you can provide swimming lessons with cheaper price at AT7 Centre (I imagine even you can offer free lessons like young people cycling sessions from which I know how to cycling, so I'll also know how to swim from you!) I also like badminton, so I also wish to have free badminton lessons at Broadheath Primary School or Red Park or Eagle Street Park 😊
- Support parkrun to put on more events across the city. Ensure the parks (memorial park) are adequately lit the whole way around.
- Easier access to booking systems and what you can attend adhoc
- For Coundon Wedge to feel safer when walking alone.
- Better walk/cycle routes through the area. I might consider cycling to work if I didn't have use/cross busy roads. Cycle/walk routes through Longford Park/Coventry Canal do not feel safe once it's dark as there are less people around. Barriers designed to stop motorbikes are a particular issue as you have to slow down/stop to get through them and this can make you feel vulnerable. Some locations do not have natural surveillance or lighting either. There have also been cases in the news of cyclists/joggers being pushed into rivers/canals so routes next to waterways need to be considered carefully. Some sections of road are particularly dangerous to cross such as Bedworth Road (especially near the railway bridge) and the junction of Longford Road with Windmill Road. When walking, the combination of too much street furniture and pavement parking can create issues – often have to go into the road to walk around vehicles. Poor air quality along the main roads and lack of street trees also makes walking in these locations unpleasant. Culture wars are problematic. There is a general lack of respect for people who use sustainable forms of transport which is often reflected in the attitudes expressed towards them. Drivers frequently go through red lights when pedestrians are crossing and I have witnessed others speeding up to intimidate people into stepping back on the pavement. The area lacks community facilities in general – library, youth clubs, etc. It is also losing its public houses, social clubs, etc. There have been issues with access to the Wyken Slough LNR carpark which could limit the use of this green space. There are no playing fields or allotments on the west side of Longford. The lack of local facilities discourages walking/cycling and public transport doesn't always allow easy access to locations that do offer them. Longford Square is not as welcoming as once was. This needs to be

looked at along with supporting the shops located nearby. On the positive side, we have access to some lovely green spaces and the facilities in Longford Park are improving all the time. Many of our places of worship and schools are active within the community. We also have a Scouts hut based in Alderman's Green. A new Pure Gym will be available at Tesco Arena soon.

- I walk around the recreational area/park in eastern green at the back of the eastern green church hall. It would be excellent if there could be a path area the edge of the field and better lighting. It would help to feel safer, make it more accessible for wheelchair users and pushchairs.
- Make membership to places like tje allen higgs cheaper for people on benifits and offer free training programs from the staff or 1 2 1 sessions
- Get me further up the nhs waiting list for the operation
- Please start the keep fit classes again. Or organise something along these lines.
- I would like CCC Adult Ed to offer zumba/keep fit/pilates/yoga during the day
- Something in Eastern Green for older people
- One of the main problems I live in Broad Street and so to go walking you have to go at Foleshill Road or Stoney Stanton we normally walk to the canal and then along the canal stop then walk back on one of the roads but you find those parking on the pavement difficult to walk on the pavement especially going up Stoney Stanton towards the canal at Gallagher as round the car wash garage at crossroads Junction you can hardly walk on the pavement nine times out of 10 you have to go on the road madness I've reported it to Parking nothing seems to get done
- Coventry roads are hostile for anyone not in a car. Addressing this would encourage more cycling.
- Make cycling a lot safer. More dedicated cycle routes. Have guided cycle tours around parks and the city
- The Council needs to create more protected open green spaces. There are no suitable places near me to exercise. There are only small open green spaces but these are used by local residents to exercise their dogs making the areas unsuitable for play or exercise. Roads around me are often congested meaning increased vehicles fumes which negates any benefit from exercising.
- A closer bus stop would help, my nearest is currently too far for painless access. I don't think it is safe for me to cycle anywhere yet and a static bike, like the gym, is pointless.
- Need to know what help is available.
- I want more choice for my age group and gender that doesnt cost the earth!
- "I play badminton, like many people in Coventry, but as badminton needs other people to play with it can be difficult for people to play as often as they want. There are a few 'No strings' sessions Where a single player can just turn up & play but some are on weekdays in the daytime, the sports centres could arrange these sessions at evenings or weekends, but they don't bother.
- My friends organise one session, but finding a suitable venue is difficult, at the moment it is run at Ernsford Grange school on a Monday at 6.00pm , but we can't play every week as the school uses the hall for exams every so often, the changing rooms are often locked, & nobody is allowed to take a shower !
- The number of sports facilities for badminton is limited, and weekend sessions are often unavailable where sports halls are booked out for other sports, or events. (I have a block booking for Sunday afternoons at AT7, but over 8 months to the end of March 2026 16 weeks are unavailable, that is half the weeks , what's the point !!) Of course the sport centres will rentout the sports halls if they can get more money, & they like to host competitions, as the Council can boast about it.
- Badminton is a sport enjoyed by all, women, men, & all ethnicities, & is especially good for girls & women who don't want to be cold, muddy, or kicked playing rough sports like football, rugby, or basketball, but there is very little organised by the Council, or the sports centres.
- Many sports would attract more players if they were promoted better, the Council even now persists in the idea of 'pointing' people to Clubs that you have to commit to, pay membership, compete for places in a team etc. We actually need more opportunities like 'No strings' where someone who

likes the idea of playing a sport can just turn up & play ! This would work for basketball, volleyball, trampolining etc, but needs organising & promoting !!

- Also the main sports centres at AT7, Alan Higgs, , Moathouse, & Excel do not have online booking ! Unbelievable in this post Covid world & trying to get an answer on the phone is almost impossible, so this stops people booking sports & swimming sessions. In fact swimming is difficult to access at AT7, Alan Higgs, Excel, there are so many different types of sessions, & unavailable times due to parties, closed school sessions, & holiday activities etc. that it is hard to find a time to just swim ! At AT7 you have to queue up for a session with limited places, it is a regular occurrence to see children crying with a parent after being too far back in the queue at a popular time , my daughter included, a couple of years ago. In fact now I book sessions at Bedworth leisure centre online for swimming, Coventry Council should be ashamed.
- In fact my daughter has wanted to use a gym since she was about 13, but it was difficult to find anywhere she could go, she has had a membership at Bedworth leisure centre for the last year, & can now get a membership at the new Pure Gym at Arena, at 16 years, but Nothing was available at 'Council' facilities.
- There is no sports centre in the centre of Coventry where everyone can travel to easily by bus or car, or cycle, & now there is going to be 900 more homes in the City centre , There is a gym & small swimming pool at The Wave, but only for members, again no way to just pay n Go,
- However there is the 'Elephant', purpose built sports centre sitting idle , costing money to keep closed, it used to be used for badminton, table tennis, bowls, squash, also a climbing wall, and had a lovely children's play area for parties. There is no excuse for the Council not to invest in reopening it, now it has been left to rot by the Council it would need some renovating, but why not ?
- Closing the Coventry baths because of the ongoing running costs was a mistake, everyone but the Council understands that, The Wave was not a replacement and was designed to get visitors from out of town as an attraction, & not to serve the needs of Coventry people, the cost of the wave & the 50m pool at Alan Higgs far outweighed the ongoing renovation costs that would have been incurred to keep the old baths & sports centre going for another 20 years. When the baths closed at beginning of 2020 as soon as the City had finished being ""European City of Sport "" , my daughter cried & we stopped swimming on Sunday mornings.
- I know the Council has proposals to get more sports facilities available, this is a good idea, at Ernsford Grange they have great tennis/netball courts, but they remain empty all Summer as does the sports hall, the same on weekends & evenings. The problem of course is Staffing & organising. These facilities & others like them can be used by the public, but as I previously said, it is no use just having them 'open' they need online booking, & staff running OPEN sessions !
- Of course the giving away by the Council of the running of sports facilities to the poorly run Coventry Sports Foundation means that it is difficult for you to arrange the availability of sports !
- Well there are some of the pointers that you can take on board, but probably won't !
- "There's nothing you can do. In question 3 you haven't included two things that stop me from being physically active:
 - muscle and joint problems
 - that I find the physical activities you list are so tedious and boring"
- I cannot walk when I want to (e.g., morning) because Gibbet Hill road is uncrossable in rush hour in term time. There's a new Zebra crossing .. but that leads only to a locked gate!!
- More areas to exercise more with groups
- I don't feel safe walking to the gym in winter months when it is so dark outside - put better street lighting on the walk from Kensington Road to Village Gym.
- Bike lane to Coombe Abbey.
- living in coundon I don't find there are many picturesque places to walk to without having to use the car first - just my personal opinion

- More cycle lanes, in particular between Cheylesmore/Styvechale and the London Rd cycleway (Whitley roundabout to Asda roundabout).
- More safe open spaces for people to exercise
- Re-introduce keep fit, Pilates, yoga to adult education. It has all been removed from the curriculum.
- Provide a sitting service to allow me more time out.
- Somewhere local to go that offers OAPs gentle exercise
- A wide range of types of activity. It shouldn't just be about sport, but also about drama, dance, physical expression - stimulating mind and body.
- "More day time exercises in accessible places by bus.
- More palate, aerobics and low level exercises please"
- More lights around the pathway at Memorial Park. Very dark in the winter months.
- Safe and organised walks
- Nothing in my local area for retired to access community venues within walking distance of Holyhead . No swimming pool or community centre . public transport doesn't go anywhere near the Wave or station . Could do with at least one bus turning right onto the ring road towards the TrainStation and The Wave.
- "Organise group walks.
- Better public transport specifically to Alan Higgs centre
- Difficult to access swimming opportunities during day as pools are mainly used by schools "
- More swimming facilities especially in the North West of the city
- "Ideally more activities in Spencer or memorial park.
- Cheaper options to sign up for a 'block' of so many sessions of gym/ pilates/ yoga. With discount if renew.
- Don't like the commitment of a monthly membership, as can't always utilise when unwell or away from home"
- Safe running routes - for example, turn the lights up on a mile loop in different parts of the city.
- I have severe arthritis in my knee and used to love aquarobics and swimming. I find both these can become costly and also not always available to do at certain times. I live outside of Coventry but I do work in Coventry.
- I think Coventry has very disappointing leisure facilities, as a family who liked to swim we often find sessions booked out at the weekend and antiquated systems for booking (for example at the Excel- having to ring up and no one there to answer the phone). On a couple of occasions as no one has answered the phone we've turned up to be told the session is full. Staff on the receptions of both the AT7 and Excel Centre are often rude, ignore you and stand around talking to their colleagues instead of seeing to people. Having young children who we want to encourage movement but find Coventry facilities infuriating and almost not wanting the business.
- Proper street lighting at night. More staff at the gym (Wave) to keep it clean (it is not clean in the changing areas at present).
- Do swimming, go to the gym, play Padel
- Subsidise or negotiate discounts on all gyms in coventry
- "More cycling sessions for Children and female.
- In door physical activities for children and females. Hiking etc"
- "Hillfields
- Spider Park
- Stoney Stanton Road
- Lightens up

- Tennis Court unused.
- We could have session's available to children and mother's. Access to women after 7pm.
- Have locker to store equipments.
- N/A
- Not many walking groups in my local area now that I have moved to Chapel fields in Coventry
- Would like to do activities but the gyms are too expensive
- More ladies only facilities
- Find more information free activities. Luckily Positive youth Foundation have a free which I go too and in my area. I also got to the Muslim resources centre where the fitness class is only £2. And the trainer is excellent.she also works for cv life.
- All users calender invites that say STOP take 10 minutes to move around- touch toes, walk, lunges stretches.
- Corporate gym membership offers in Coventry
- I love swimming but the cost can be off putting. I understand why it costs what it does due running costs. If there was some funding towards it or a reduced cost that would support me more.
- Lack of informal facilities in Allesley, Coventry
- More tarmacked / hardstanding park & green space walks, ideally in a loop.
- I already spend at least 14 hours per week walking. I do not want help in walking more thank you.
- Local places close to home, easy times after work or weekends. Activities you can do with the whole family, gives you quality time and a great bonding time whilst staying active
- I've just started at the gym with a pt but as an overweight individual its hard to stay motivated, so having more places to go when not with them or at work would be good especially an affordable option
- Make parks safer for females to walk alone without being approached/propositioned.
- It would be good if there were exercise areas in the local park (Naul's Mill Park in my case) - with bars for calisthenic exercises like pull ups, sit ups, press ups.
- I love being out and about should the weather be reasonable and not wet, cold or windy due to my health condition.
- With the dark nights, safe parks local to where I work, especially working in the city centre. More groups that work together which could make it safer.
- Tun a group
- I belong to a community passionate about cricket. We don't have nets around CV2 area. Edwick park nets are far from stoke and Wyken
- have group support and gentle exerices age related and easy access at discounted or free cost
- I would love to be able to swim again, but cost of the gym membership at the village hotel by me is too expensive. Also you cannot just pay to swim you have to take out membership.
- More availability please for south Asian Muslim women
- I'm not sure
- Parks, open areas, outdoor gyms
- More astro pitches
- Make the parks better to walk round
- running club
- Running

- No
- I do 30 minutes of exercise with video for the over 70 's
- Free time
- Places are so busy that someone who is slower needing time not always available
- "Safe accessible places determine whether I'm comfortable to walk alone. Coombe Abbey is a wonderful resource but I only stick to the main paths because I'm wary of walking alone. Irresponsible dog owners mean that I steer clear of paths where dogs are off lead.
- More green gyms in rural locations please.
- Cheaper public transport would mean I would be more likely to walk to the bus stop/train and then walk around the destination rather than taking a car. I don't feel particularly safe walking into town with my children due to crime.
- "more spaces with floodlights to support youth football training over the winter months that has a reduced cost.
- I go to a over 50's zumba class once a week at Xcel. I would like something more than once a week for my age group
- "If not able to provide a hydrotherapy pool, then a central/good access(via public transport) swimming pool (+ also large jacuzzi) heated more than the usual temperature, where one can swim/exercise in shallowish water + not have to swim only in a lane format with deep end.
- Years ago they had classes on a tuesday afternoon in Tile Hill area before it was ?? demolished."
- Since 2022, I provide different sport (Football and Basketball) activities for youth and adults, Last summer, I organised football activities for adults aged 18 and over, and many parents from different communities also took part. I created various community events and friendly football tournaments in the local park. Even though it was challenging without any financial support, we managed to bring people together and promote health, teamwork, and community spirit. I am now looking for funding to hire a safe and suitable space where I can continue offering football sessions for adults and young people aged 18 and over. I can also provide photos and other evidence of these activities if needed.
- Provide more activities specifically for those with additional needs as a lot of people can have a very negative attitude to those who do not behave in what they consider to be a neurotypical way.
- Create safe spaces and opportunities for single people to come together for certain sports which you can't do on your own eg badminton, tennis, padel etc
- Bands in the park to every park around Coventry park next year
- It would be great to organise walks in parks or routes gathering groups of people.
- I'd like to attend classes locally but not sure what classes are available and when
- Publish list of local walks and public footpaths.
- "Park safety
- A path in the park and more seats and bins (lake view park.) it gets boggy muddy mainly suitable for dog walkers, should be for all "
- I like to run outdoors, usually around the streets in Cheylesmore. Wet leaves make that difficult at the moment, I don't want to slip. I'd like to do park run but the memorial park run is too crowded, and I don't have transport to the other Coventry one.
- "Swimming pools seem to have quite limited public swim times, there are lots of teaching lessons in the day and not much open access.
- I've never found daytime dance session. "
- Make the park light when it's dark especially the Slough park area
- Sports Centres should be open earlier and later on weekends. There is no reason for (for example) the Alan Higgs swimming pool to not be open until 9pm on Sundays too
- Stop closing golf course and do maintenance at Allesley course.

- Facilities for older people within walking distance to my home in Broad Lane
- I prefer to swim, but as I'm now a pensioner I can't afford to pay a regular monthly direct debit. I can only go swimming when I have spare cash available.
- Get my surgery brought forward
- Find a group
- Make the roads easier to navigate - so many road works going on mean that i am unable to travel to the parks i like to run in because the travel time is unmanageable
- regularly inspect and clear overgrown branches overhead and at sides on pavements, especially for shared use, don't wait for fixmystreet reports; clear fallen acorns and chestnuts, shards of glass,; monitor and clear overgrowth on time on footpaths as entrances/exits from/to the fields around city; fix road (and some pavements) surface for popular cycling routes; do something more cycling friendly at canley ford and northbrook; bramble street too narrow for cycling with buses and both side parked cars and needs a permission to turn left towards city centre; hang basketball nets on rims at parks, clean skateparks surface; prevent cars parking on pavements fully blocking way, especially around industrial estates; clear flytippings around river sowe, from areas away from footpaths, but damaging environment, also clear river itself, and coventry canal footpath needs surface to be renewed for cycling i think, from hawkesbury to basin
- Exercise classes for 60plus age group in local communities and accessible by bus in poets corner area
- Meeting people would help, having people to do stuff with
- Maybe some support to get outside
- Cycle free walking/running tracks
- "Keep the carparking free at the war memorial park in Coventry.
- It's good for the park run. Also taking the grandchildren
- I would use combe abbey but for our of town parking it's becoming ridiculous."
- Without my own transport I would find it difficult to get to Xcel Leisure Centre which I go to 4+ times weekly. I would have to get 2 buses each way.
- Nothing
- have O.A.P / ADULTS only SWIMMING IN COVENTRY
- Help build a community where like minded individuals can connect
- "Less expensive car parking and fuel prices. Safer roads/drivers.
- I frequently walk with my grandson 2 1/2 but it's difficult to find somewhere safe to do so we were recently walking on a path between narberth way and Wigston road Walsgrave and where almost run over by a motorcycle, despite there being barriers, it's really put me off , and makes me anxious, the pavements are crowded with pavement parking and so I am finding it increasingly difficult to find a place to go
- Allow pensioner prices on the monthly Excel centres fir swimming nit everyone can use the gym
- I'm looking for a gentle exercise or yoga class that's accessible to me on evenings or weekends at Blue Coat School. I work during the week but have Monday and Friday afternoons off, so an afternoon class on those days would also suit me well.
- Other local venues that would be convenient for me include Gosford Park School (Humber Avenue), All Saints School (Strathmore Avenue), and St Anne's and All Saints Church (Humber Avenue).
- I used to attend yoga sessions at Cheylesmore Community Centre and Stoke Aldermoor School on Monday and Friday afternoons, but unfortunately, those classes no longer run. I've checked the Choices magazine, but it now only lists dance activities. I'm not interested in belly dancing, line dancing,

or Bollywood dancing — I'm looking for something that supports core strength, balance, and overall wellbeing, which are especially important as I get older. Choices magazine confirmed that they now only offer dance-based activities.

- I was pleased to recently discover a Sunday exercise class run by CV Life at the Herbert Art Gallery, although it doesn't seem to be well advertised. I think more people would attend if they knew about it.
- If there were a walking group starting from Terry Road, I'd happily join — I'd feel safer that way. At the moment, there doesn't seem to be much available locally to help older people stay active, and I'd really like to see more opportunities for this in our community.
- Free access to a gym that helps people like me that have mobility problems
- "Put an outdoor gym in Allesley park.
- Arrange scavenger hunts around local parks.
- Start a website for people to find activity buddies."
- Group low impact exercise in Longford maybe at the church hall?
- "Women's walking groups in the park
- Or female only events "
- "More female only swimming sessions. There are
- Very few and they're at awkward times."
- You could stop throwing away money on racist and bigoted things such as DEI, or on money laundering schemes like "net zero" and you could instead hire more police to walk the streets.
- More accessible activities for people with severe disabilities people permanently in power chairs, online activities or groups like chair relaxation and yoga... I can stretch my neck and do breathing exercises to help me,
- Extend the relaying of paths.
- free events
- I'm 54yrs old, i think arthritis is setting in, i'm massively overweight and scared. I'm also out of work and can't afford to train.
- More affordable and nearby gym facilities
- War memorial funded activities, discounts on tennis club
- Goal posts back in the parks. For gods sake dont start charging to park at memorial park, thats one of the few places to go jogging without having to run along roads.
- "I would like more facilities in and around Earlsdon that I could walk to.
- At the moment I am travelling to moat house leisure centre for a couple of my activities which is an absolutely fantastic centre , I wish it was nearer to earlsdon so I could walk "
- No facilities for older people in any Coventry park such as pétanque (French boules) where all ages can participate. The young have play equipment, youth have tennis/ football etc. pensioners nothing
- Bring back indoor bowls to Coventry
- More information about groups and activities in Coventry. More me persoanlly that would be areas close to St. Michaels and the city centre.
- "Coventry City Council don't cater for older people , there are few benches , it could've been?level footpaths, bowls or french boules pitches when there are loads of football pitches etc

- Why is there no walking path around Hearsall Common - both sides and the woods? This has been done in other areas - tile hill wood, jardine crescent etc. The woods and green areas become mud and waterlogged from Oct through to March - creating a path with benches would make people use the area more.
- I would like to swim, but at my great age I need easy access to the water, the pools with this are too expensive and should offer cheap off peak
- Brackley Close, Eversleigh Road, Birchfield Road, Mapleton Road, Brownhill Green Road, all the paving slabs are broken by cars driving over them to get on the drives of people who have not paid for a dropped kerb so when you try to walk with or without a stick there is always the danger of a fall which isn't good for the elderly. I have reported this but nothing has been done
- "Safe local places as I don't drive. Exercise for older people in my area. Arm chair exercise for example as zip have painful joints
- CV3"
- "As a senior citizen with mild/moderate COPD I walk every day at a fast pace, as a form of aerobic exercise. I do not live particularly close to a park, so walk built-up streets. The biggest problem to this, is the ever increasing amount of pavement parking of vehicles, obstructing the pavements. I am able to walk around these obstructions, but sometimes that involves having to walk in the road...if this is a problem for me, then how do wheelchair users, the partially-sighted etc cope? This needs to be addressed by the City Council.
- Use of of gyms for sessions for older people. Wyken/Stoke
- Having activities in my local area maybe in a local community centre rather than having to go to a gym.
- I'm lucky as I have lots of walks, Allesley and Coundon Parks and country footpaths. Some pavements and lanes are in need of repair eg Staircase Lane and Nothbrook Lane.
- My doctor's surgery invited me to learn to swim, or learn to play golf or learn to play indoor bowls. 12 week course at reduced rates at appropriate centres. 8 years on I'm still attending, improving and making friends.
- Increase amount of trees in Coundon Wedge and also near Amazon BHX4.
- central sports facilities - i used the elephant multiple times per week before it closed
- Bowling Ten pin walsgrave
- "Party Runs offered in other location other than WMPark- eg. Longford Park
- Facilities in schools should be offered at more locations across the city but particularly at weekends
- Most offerings are City centre specific
- Car parking & fees need to be suspended "
- I'm not sure
- SOMETHING OR SOMEWHERE I COULD GO TO, TO DO EXERCISES SAT DOWN AS MY LEGS ARE NOT GOOD AND I DO NOT HAVE ENOUGH ROOM FOR EXERCISE MACHINES.
- Cheaper gym membership
- There are many dogs without leashes at the park (black berry lane) . I am always scared when I walked pass them or see them without leash. As a result of this , I stop going to the park.
- "More cycle lanes
- Safer to streets to run on and better state of footpaths, lots cracked with tree roots, paths currently slippery with leaves
- More parkruns accross the city so there are more local to people - exercising and meeting old/new people is great. One's in the Memorial Park, can't there be more?
- Also more visibility for groups facilities for elderly people so they can get moving too

- Offers for council owned gyms/leisure centres
- Closer to home, perhaps in a local village hall, and no more than £5 per session. a straightt after work session
- Exercise equipment in folly field. Better pedestrian infrastructure the state of some footpaths is well below what one should expect
- More inspiration; activity ideas, success stories, discount codes. Practical steps to get me out of the door. Preview of venues/activities so I know what to expect.
- "More daytime walks in my area.
- Swimming pool built locally."
- I have no idea
- The parks are great, War Memorial and Allesley in the summer but dark mornings and dark evenings put me off in the winter
- Street cleaning and weeding. Streets around earlsdon don't appear to be cleaned very often and can be very unpleasant
- Time
- Running a regular tea dance every week.
- Some thing on tusday wedday it there any thing on universal credit so money tirt
- Good well-maintained and signposted footpath network in and around Coventry
- Remove the rubbish, ensure cars do not park on the pavement
- Community fitness activities
- "More gym classes
- More affordable gyms "
- Liaison with physio, doctors, etc for suitable exercise that fits in with health issues, etc
- REVIEW PRICING
- Swimming information made clear, doubt the new Swim facility would be for me.
- Clean and tidy facilities to make them more appealing. Reward scheme for those trying it for the first time an app to help track and motivate and provide new areas and share event details coming up.
- "Adult only swimming consists of swimming continuous laps which is no good for a beginner.
- No refresher swimming classes for adults.
- No limited mobility only sessions /classes in the pools.
- Get more lighting the whole way round the memorial park
- "Plenty of places to do the exercise I want to do so nothing more for me.
- "More information on what is on in my area (CV6) easily accessed, all in one place.
- Cheaper public transport to get to activity "
- Charterhouse fields needs more facilities to enable people to get fit and active walking groups with leaders better play facilities for the children but adding the outdoor exercise equipment for the adults might help. With the developments of the National trust and the environment linking them all together would improve the local area and attract more visitors
- Make the prices more affordable for me
- More street lighting in the longford area so i feel safe to walk in the dark
- Nothing, I'm active everyday
- there could be walking groups in different parts of Coventry and it would be lovely to have more dance classes for adults

- Prices of swimming ans availability
- Provide more classes for active older people
- I could do with benches along Proffitt Avenue & Old Church Road
- More buses through Earlsdon
- Trainer led peri-menopause specific weight training classes; and at times not during the working week
- "Safe spaces for women. Better street lighting to enable safe street running
- More flexible times for events such as gym classes
- Group outdoor activities"
- "running by busy roads, mixed with cyclists on paths is unpleasant and often insulting.
- running round the streets in the dark is unsafe, same goes for the park if I can get there.
- so make streets and park safe in the dark and when less busy. also ask bikes to respect pedestrians and slow cars down. More low speed residential areas, include bikes in speed limits, illuminate and patrol areas to increase protection."
- Walking partners for safety
- More information about groups
- Would like more groups and community activities, local park is very close (lake view)
- Provide more linked up cycle paths
- Improve pavements and footpaths. Mount Nod.
- "I used to use the toning tables at the old sports centre but these were subsumed into the facilities when the model changed from discrete payments to a monthly subscription, which I couldn't afford. There are no toning tables available now.
- Toning tables were originally devised for people with arthritis and had wider purpose for others with limited mobility and health. This rationale got completely lost in the changing nature of the sports centre.
- I doubt the council will be prepared/able to reinstate toning tables due to the cost. If they could, they would need to be separate from the current subscription model.
- I am raising this issue as I feel that there is a large constituency who might be unable to take advantage of what is being proposed, but who desperately need a means of exercising safely and appropriately, something the toning tables offered."
- Be more accessible to Visually Impaired people. More assistance when using public gyms etc
- Having less joint pain would help me move more
- "Keep providing free car parking at The War Memorial Park
- Put lighting all way round War Memorial Park so feel safe when walking/running"
- Daytime classes away from the city centre
- Showdown is traditionally played on a wooden table. There is no reason it couldn't be played outdoors though, if one were made from metal or stone. I use the War Memorial Park, and an outdoor table where we could play would be a great facility. There's the wonderful gym equipment in the Longford park, so more of that stuff would be great fun.
- Make Caludon Park safer
- I find if you want to walk or exercise there are plenty of sites to do it, and exercise equipment park as in Victoria Park Leamington
- I play tennis at the War Memorial Park & although there are floodlights the surrounding area is extremely dark so I have had to stop playing now as I felt very vulnerable !

- "Run more community based activities in every area of Coventry.
- I live in the southern part of the city, on the edge of Stivichall/ Cheylesmore. There are quite a lot of things at the Cheylesmore Community Centre organised by the Adult Education Team but at a certain cost unfortunately. I have found a very affordable sport initiative launched at the Xcel Centre for 50+ for only £2 an hour (and it is a drop in. No obligation to turn up every single week). This example be copied and offered in more places. Community run activities like those also organised at the Foleshill Community Centre should be advertised in a better way. Maybe a list of free and/or affordable activities could be posted on the Go CV and other websites."
- "Memorial park, worried to walk or run on day evenings.
- Used to play badminton with friends but it was really difficult to get court. You can't book them online. Had to ring up and wait for someone to answer, only to find the courts were full."
- Recognising state pension as eligibility for go cv + status. Govt are classing it as a 'benefit' when it suits their agenda/scenario but the fact that it is not one of the qualifiers means we can only have ordinary go cv card. This debars us from participating in most of the provision under the scheme
- Fewer cyclists on pavements.
- Nothing
- "Edgewick park has the equipment but it's mainly used by Eastern Europeans as seating. They're in large groups and quite intimidating, so don't feel safe asking them to move.
- More community led sessions at a lower cost or even better free. "
- I can't swim and would like more access to swimming lessons. They tend to start and end at certain times. They should be offered continuously. I can't ride a bike proficiently. Adult bike riding lessons would be great. Better advertising of activities and reduced costs. Gym us a turn off for me, more open-air activities would be of interest and small group activities.
- More accessible swim times for children who are good at swimming but don't want to go swimming in the family time session at Xcel. Can't go early morning due to secondary school but weekends are family swims or adults only. She's just as fast as adults and just wants to do a few lengths without interruption.
- i walk and run a lot and find that its the most difficult in the winter months - as the nights draw in quicker and often gets dark by 4/5pm it restricts me from going out after dinner for example due to safety concerns and no lighting in the parks - Stoke Heath Park and Wyken Croft are both places where i enjoy walking/running but it's pitch black in the Croft and there is the tiniest bit of lighting from the street lights for Stoke Heath Park but not enough to comfortably walk round. Can we not adopt similar approaches to Leamington Parks e.g. Victoria Park where they have installed solar bollard lights all the way round? It's just a much nicer place to be when you feel safe and i don't want to have to go all that way just to walk and feel safe. Solar Vision Lighting Technologies is a local company that provide just that
- Safer areas and parks to walk, run and cycle
- Stop the dog owners from allowing their animals' fouling and ruining pavements and parks.
- Better, safer places to walk
- More drop in sessions.
- Signposting events for seniors
- War Memorial park
- Great local nature areas such as Sowe Valley but insufficient foot paths and lighting.
- Nothing that can be done apart from medical interventions.
- I live near the Maudslay pub off the Allesley Old Road. The Village sports centre is near by but too expensive

- More wardens in parks such as War Memorial Park and Whitley Common
- I would like to cycle more with my son but I don't feel safe in the roads. I can see more cycleway are being put in, but they don't seem to join up. We joined in with the cycling event when roads were closed and people were encouraged to get on their bikes and I thought that was really good. It did give me more confidence, but then I lost it again, so events like that could happen more often, encouraging everyone to get on their bikes. Sometimes I walk at the Memorial Park and I like that. I think it is accessible and the free parking for 3 hours helps. I could even play team sports there if I wanted fox or on Hearsall Common. It is accessible. I just don't really have anyone to do that with. Everyone seems so busy and caught up in their own lives. It is hard to meet new people nowadays.
- more walkways
- Outdoor gyms are normal additiin to each play area around the world. In Cov we have only 3 or 4 as far I am aware. The facilities for children (so that they start liking being outdoors) are outdated and not welcoming at nearly each play area. If you encourage children to be outside by updating play areas for them and for the adults, that will prompt more families to come outside and exercise together. Look at Binely Tic Toc Park, there is so much space that could be turned into an outdoor gym. Or the green space around Binley Fire Station. There is so many people jogging there and that will help a lot if the outdoor gym would be placed there to do more than just jogging.
- Throwing money st this isn't the way to solve it. I get that someone has had this great idea that the reason people dont do more activity is because of lack of opportunity. It isn't. People have different priorities and whilst the idea of encouraging Muslim women to walk in the park or white children to play football instead of FIFA is noble, the reality is the amount of kids that are going to pick joining a 5 a side over smoking weed is perishable and insulting. This has been a thing for years and wont change no matter whose job has been funded to do it. The problem isn't availability. The problem is driven by a lack of decent wages, housing and prospects.
- "Being able to access green spaces traffic free would be a game changer. I live in Binley, and we have some great routes (Sowe Valley, Coombe, 12 o clock ride, Binley woods etc.) but none of them link up without having to run on busy roads like Brinklow road, or paths next to busy roads which randomly stop leaving just the carriage way. Or sowe valley for example requires running through and around the hospital rather than just behind the hospital to walsgrave hill which would be far more enjoyable, traffic free and Mae the route more accessible.
- There's very limited parkland around this side of town, we're missing a park like allesley park or memorial park within walkable or runnable distance, to a park where you can run loops, access services etc. all traffic free.
- It's a shame because in Binley, 500/1000m of connecting paths to existing paths would connect up all the great spaces (Coombe, Binley woods, sowe valley) completely traffic and road free, and a little more pathways around Coombe fields road could connect you to the canal pathways further improving access to green spaces and the Coventry way etc. "
- More aqua aerobic classes
- A cycle path at the Memorial park would make it easier and safer for people to walk around either individually or in groups without having to constantly avoid cyclists
- I dont think its up to you to motivate me or others, its up to ourselves.
- Make me ten years younger!
- Happy with the amount I do
- Local affordable swimming pools for adults only. Country Parks with easy access and free parking or easy public transport
- Local activities in parks. For me it's War Memorial where more sports events could be organized. I'm very happy to see people started playing football and cricket there. There's Saturday parkrun and Sunday parkrun for kids. Once a year we have Sphinx running club organizing a run there and I think there's a sports day organized by Indian community once a year. I think there's a potential for more, especially for kids. Sports events for kids would

be popular and would make parents go out, cheer and maybe compete as well (if some family events are organized, maybe family running relays, maybe cycling around the park?)

- Times of classes - offer lunch time options or after work - e.g. 5.30pm
- Safer cycling routes to and from City Centre. Better access to (walking and cycling) to precinct and market while building works are taking place.
- More police visibility in my area St Austell Road, especially in the evening as we are plagued with motorbikes and fast cars racing round our road and attoxhall road like a race circuit. It is unsafe to go out after dark. Drug dealers parked up at belgrave square, you can't even walk to the shops safely after dark or in the day.
- "I get anxious with too many people and have mobility limitations
- After having a heart attack I'm now scared to do touch incase my heart can't take it
- All I need is there already. I do exercises at home before getting out of bed (15 minutes); knee-strengthening exercises and indoor cycling (about 25 minutes); and walk into the city centre along Warwick Road to visit the library and do small bits of shopping.
- Make it 4 hours free parking like all the others that are free to park
- "Banner Lane, Tile Hill
- I have to walk alongside very busy roads. Yesterday I had to cross Upper Eastern Green Road four times as the path was blocked by workmen's vans. Not good if you have a pushchair or have mobility limitations. It would be good to have safe areas to walk. As a lone female I would not go into the wooded areas and am also wary of parks"
- run mire activities in Allesley Park either at centres of in the park
- "Carry on with the roll out of cycling infrastructure, the cycleways are great, except that they are often from nowhere to nowhere, they need to actually go into the city centre and link up with other cycleways, not just dump you out on a busy road. Better cycle parking infrastructure would also help - the set up at the station is good, but other areas such as the city centre or Earlsdon High Street are lacking.
- Also, better facilities for Coventry Cycle Speedway club, they are doing great things, especially for kids, but the facilities at Hearsall Common are very basic."
- "Ensure that parking is kept free at the memorial park (there was some talk of introducing fees instead of the free 3 hours).
- Bundles for the swimming pools or exercise classes at the council owned leisure centres eg buy a bundle of 10 swims for the price of 8. "
- "Cheaper admission to swimming at the wave Coventry
- Better still would love a outdoor pool for the summer for children and adults
- Or a paddling pool for children "
- "Street lights being off in the morning make its much darker when out running. I run everyday so often have to get up very early in order to run before work, I wear a headtorch but it is not ideal.
- It would be good if the bike hire was rolled out further to the East of the city, I have to walk almost exactly a mile to get to my nearest bike and am still the same distance form town, whereas it is borderline quicker to spend that mile walking towards town and then just continuing on foot. I understand this is not controlled by the council but maybe they could be advised or support with a further roll out."
- I'm a disabled woman so getting places is an issue as I don't drive and I need to feel safe
- I don't really know.
- I think that I would like to walk regularly but not on pavements which can be uninspiring. Led group walks in parks near me (Caludon Park, Morris Comman). They need to be accessible to slow walkers and not be competitive.
- More blind sports in Coventry. As of now there is only one, which is Show Down.

- Access to gyms free without needing to be on benefits. Free for over 60's- not only poor over 60's
- Parking charges at Combe abbey put me off visiting.
- activity equipment in the memorial park
- Weight training in the gym for women only
- "Perhaps local walking groups so that you don't feel vulnerable walking alone or when it is dark.
- Better upkeep of footpaths such as the sowe valley footpath and publication of walking routes for all abilities."
- Nothing
- I'm not on benefits. So cost for activities could add up pretty soon which is difficult. There isn't any publicity for free, group events - such events would make me feel safe to participate in. Due to safety concerns, and being a female, I don't feel safe wondering in parks on my own. I live in Princethorpe Way area (near Morrisons Estate).
- Entrances to coundon wedge inaccessible for a mobility scooter, no usable path services either there or across lake view park. Not enough drop kerbs or they are blocked or hazardous, ie the one at Allesley road traffic lights junction of Hearsall lane slopes steeply scares me when on my scooter as it leans too much
- Safe routes for cycling
- "Increase facilities like indoor bowls rinks rather than closing them.
- Make the free bus passes available for use at ALL times."
- Improve road surfaces for cyclists.
- More benches in parks and open spaces so I can sit when tired. Proper paths too.
- I live in tile hill coventry. There is nothing in my local area. or near. Mosty thing are to far away which means you have to be able to drive or travel on bus to reach. We have a schools which could be you a youth centre. Church Hall. Nothing for my age group or I would feel inclusive.
- improve coombe abbey fishing lake as its a DISGRACE at the moment ,its been left to go to ruin
- Better street lighting in and around parks such as Spencer Park
- Provide more allotment sites across the city.
- Free activities
- Use community centres to put exercise classes and group on.
- Knowing about local classes and groups to do activities in my area
- Outdoors gym near cannon park road
- Provide clean gyms with functioning lockers that are big enough to hold peoples belongings!
- See above. There is only one place that offers line dancing, but it is some distance from me and only on in the evenings. I am older and female and not keen on going at by myself at night. There is no direct access by public transport.
- Lots of the cycle paths are not joined up - and so you go from being on a cycle path, to on a 30 mph road, to back on a cycle path,. One example of this is banner lane/station avenue southbound
- Something local, accessible, affordable and being done by people who have some understanding that not all of us are young, fit and healthy but would still like to take some part is exercise and fitness for health and well-being.
- I wish every road in Coventry had segregated cycleways like the ones in Binley, Coundon, and Charter Avenue, 2. I wish there were more bike-friendly crossings on dual carriageways like the new one on the A45 by the Esso petrol station, for example Butts Road near the junction with Albany Road really badly needs through-crossings for bikes rather than the four sets of lights for pedestrians, there is no room for cycles as well as

pedestrians on the island in the middle of Butts Road - this has become a nightmare for cyclists since the road was widened, 3. I wish they would put back the subways under Junction 7 which were much better than having to wait at so many different sets of lights, and 4. something really urgently needs to be done about the way the cycle lane under Junction 7 just disappears, it becomes a shared footpath on Croft Road with no cycle lane markings, having overgrown hedges on one side and a sloping grass verge on the other -ie. an accident waiting to happen with speeding deliveroos coming round a blind corner, aggro from pedestrians, etc. 5. how are cyclists supposed to get across the junction between Starley Road and the entrance to the Skydome complex, where there are no signs or lanes marked going towards the city centre? It is no wonder so few people attempt to cycle around Coventry with such poor infrastructure, I am a die-hard cyclist and it is enough to put me off going into town, 6. there is a serious lack of safe racks to park a bike in the city centre now the redevelopment is underway, none of the racks that were removed have been replaced and the few that remain are inconvenient, unsheltered, and targeted by thieves

- Make parks safer and cleaner.
- "Pedestrian crossings on Coundon wedge Rd. And from Holyhead Rd Tollgate to the Elms.
- This would make the wedge more walker friendly
- ""Cycle way has been put through Coundon hall park with no speed limits for bycle or scooter s and a blogger suggesting that these have priority over pedestrians crossing what used to be a safe green space and people saying they would not slow down to avoid collisions with pedestrians or dogs crossing it even though law states that pedestrians should always be considered to have right of way when crossing roads or cycleways
- Perhaps signage should be put at entrances to what is considered a park to be aware of this and a speed limit of 15 mph max be put up"
- Have something for people with fibromyalgia and spine issues
- Get police to be present in the parks on foot everyday and bring back police just walking around engaging with people edwick park is the location in question my sons school actually gave us a letter warning us about the park so tackle the issue as you're clearly aware of the situation
- more free activities
- I walk at the War Memorial Park because I don't feel safe walking in my local area of Cheylesmore and Styvechale. I would like to see a Police presence such as PCSO's regularly patrolling.
- A swimming pool that I could walk to would be ideal. I live in Green Lane South. A swimming pool at the Memorial Park would be ideal. We lost the outdoor one where Poolside Gardens is now I believe.
- "Free parking at activity sites including parks.
- Reduce pricing on activities ie the wave is cost prohibitive for families like mine"
- "Most activities are aimed at children or families so it can be hard to find things that are accessible to adults e.g. ballet classes, archery, assault courses.
- More accessible activities within the area of coventry city centre so its more walkable to get places that offer activities. Very few places offer taster sessions - some you have to sign up to a course and you don't even know if the place will be welcoming. "
- I'm pregnant at the moment and need to go to the toilet very often. The best time for me to go for a run is before work, but it is also a time when toilets in war memorial park are closed. I got the radar key for accessible toilet but it seems to be locked as well. It's not a huge problem and I know being pregnant is quite specific and park is empty around 6am so it likely doesn't affect many people.
- More cycle lanes. Connect up the ones you have. Encourage all to have better access to sport not just those in areas classed as deprived
- "We don't need any more help as far as walking is concerned. We walk around our are in Potters Green, then along Shilton lane, past the cemetery, then turn right along Woodway lane until we reach the sports fields. We then turn left and walk round the fields until we come to the bridge over the canal. If reasonably dry we will walk along the canal path for about 1500 metres. We always take some proper duck and swan food with us. When we see some birds we will stop and feed them It is quite fun because they will recognise us. Then we will turn back and when we reach the

bridge will turn left, joining Woodway lane again and it is about another 2 km home past Potters Green shops and on until we reach home in Frankwell Drive.. I am 88

- and my wife is 65. It is not difficult. We often meet other regular walkers on our route,, often with dogs which recognise us. Quite fun
- We started walking longer on advice from my doctor after I had heart attack and heart surgery. I do have to take care and tread carefully. I never go out or walk alone and need always carry medications with me. But if I can do it, many others should be able to."
- Don't know
- Swimming is one of the best activities for someone like me but I have no local pool within very easy reach, no outdoor swimming areas, nobody to do it with and I can't afford it even if there was somewhere.
- I love outdoor equipment in parks - please extend this! Only seen in a few places in Coventry, nowhere near me. Would be great to use different core muscles by integrating into my walks. How about installing in Memorial Park? Or small parks around town. Keep maintained. I could use to strengthen arms, etc.
- I think I do enough, using AT7 centre and walking along the canal between Ricoh arena and greyhound pub. I sometimes walk from Ricoh to Gallagher retail centre, but don't necessarily feel safe on that part of the canal. I also walk to town a couple of times a month, which takes 50 mins from my house.
- "Prompt response to maintenance issues i.e. door handles not working in swimming changing area Xcel. Hairdryers not working Xcel
- Hairdryers not available Moat House
- As above"
- Different initiatives to try. E.g. pilates taster
- Stop closing footpaths and building all over the countryside around Keresley. Stop scramblers using Bunson woods. People need wild spaces. I use to go to evening yoga classes but there aren't any. Not walking distance anymore
- having more energy
- Have a path that you could walk the field in Brookstray park CV3. Make sure any paths are maintained by making sure trees/bushes are trimmed back
- Less hours at work
- More swimming pools that don't require membership
- local areas to swim outdoors
- War Memorial park. Advice on exercises to do at home
- I don't drive but I enjoy walking into the city centre to the library, shopping, cafe etc. However, as I live in Coundon, I need to go through the underpass from Spon End to Spon Street. I used to be quite happy with this, until delivery drivers started to come whizzing through. This route into town has now become scary. I still use it but I have become cautious. There may well be a time when I opt to use the bus rather than walk.
- More affordable excessive stuff in Willenhall and surrounding area or scheme for gyms for low income households
- Provide netball courts. We don't have any public free netball courts in Coventry. One park Naus Mill has a court marked out but no netball posts
- Access to footpaths and more natural countryside that isn't blocked for parking (many laybys or potential parking places are barriered, although I understand why because some people can't use them appropriately so it gets blocked for everyone). Swimming pool access in North west of the city so don't have to take ages to drive to a pool (although that will mean losing more countryside that we have already so we lose out either way)
- Buddy scheme
- I live near lots of green space which I used to walk on regularly. Now I don't feel safe - lots of reports of dog attacks, men in bushes, mugging. Very sad situation

- Clear debris from cycle lanes and paths more often.
- I have advanced osteoarthritis. If I could access a knowledgeable person at a gym, I would consider gym activities.
- Busy traffic that is noisy, polluting, on Brandon Road and makes it difficult to cross as a pedestrian. Also lack of joined up cycle paths across the city. I got rid of my bicycle as I didn't feel safe enough to cycle.
- As I don't drive I would have to use public transport to access most leisure facilities. Buses are not safe for elderly people. In the last two years I have been injured twice on a no 6 bus once in an unprovoked attack by a passenger and once by a driver driving dangerously. National Express failed to deal with my complaint. Priority seats are often taken up by people with shopping trolleys or by families accompanying mothers with pushchairs. I choose to keep myself safe so only travel at times when buses are likely to not be crowded. This limits my ability to travel locally.
- More accessible options for winter/raining days
- All I want is access to the gym and sauna at Alan Higgs Centre for £20/month. But no, I have to sign up and also pay for a bunch of stuff (e.g. the wave) that I don't want.
- Improve Floyd's Field. Tile Hill Village. I was told there were plans? to get a proper path around, make access for wheelchair users (there is none at present), and update children's play equipment (which is dire) and provide benches/bins.
- More specific walking areas
- Make places like the wave cheaper.
- I want to start going back to the gym but I can't afford it
- Cycle path around lake view park
- Up to date information on local classes, dance, keep fit, yoga, etc.
- More outdoor gym equipment would be wonderful, in accessible community locations
- "I love cycling but now I have a 2 year old I'm not prepared to risk cycling on a road. Especially not when (by my observation) 25% of drivers are distracted by their phones. The cycle lanes really help but they don't join up enough and there's not enough cycle parking particularly near the places I want to go in the city centre
- It's a pain to walk with a pushchair if there are no drop curbs or they don't line up. Also I avoid places where parked cars block pavements or if there's no visibility to cross roads e.g. because the drop curb is not close to the junction so you can't see whether anything will come round the corner.
- I can't really list places. This is just how half the infrastructure was designed
- "Things like the mini golf that was in the park was a great way of getting active with friends and family - would be great for this and similar activities to be in the places like Memorial Park!
- Provide more opportunities for older aged people e.g. over 65s during the day. When I look for activities there are very few. I'd be interested in trying activities such as Thai Chi, Pilates etc where classes cater for an older aged people group as general classes with younger participants can feel intimidating. Somewhere central or in the eastern side of the city.
- Informal, free parking
- better public transport so I can reach the gym/sports locations more easily
- Local parks holding accessible, staffed movement sessions. Website info on where accessible pools are located. Disability friendly running/wheeling groups. Supported volunteer gardening/clearance sessions in oaks and wildlife areas.
- cost of xcel could be cheaper i have a cv+ and over 60 so the cv+ card is invalid yet you do deals for students and they have their own pools at warwick uni and cov tec
- Relaxed swimming sessions for older people, more affordable exercise classes like Pilates.

- "More information about green Cross country walks ie how to access the route and any organised walking groups - Tile Hill - Kenilworth etc especially as HS2 seems to have cut through the path- maybe real directions on a signpost
- Host groups on the Cov CC website or supply email addresses or phone numbers
- "Allan Higgs gym, time with trainers/supervisors, would help patients recovery by guiding them through the right machines and helping them to set programs
- More availability for adult swimming at the xcel leisure centre would be ideal. For someone who works 8-4 the available timeslots can make it extra difficult to go swimming because of the limited sessions, especially at the weekend when almost all of the day is family fun sessions & there is only a single non family fun session. I would love to swim more but the limited session times combined with working full time make it difficult
- "All our banks have gone from my area (Walsgrave Road - Ball Hill area). It appears that every building that gets empty turns into a hairdressers, take-away, gaming business, charity shop or mini market.
- Turning an empty building into a hub that does banking, has activities for teenagers, the elderly, meeting places, maybe educational classes would be a blessing for this area. There are a lot of lonely people who would love to get out and about and are definitely fed up with how our area has become. I'm all for change but this is going backwards. "
- N/a
- I use a wheeled walker and struggle with blocked and uneven pavements
- "I would like more local classes in Keresley.
- Presently I travel by car to a gym "
- Better secure places in the city centre for bikes, I am reluctant to take my bike into the city centre in case it gets stolen.
- Organised classes outside on the green space land the back of Xcel in Mitchell Avenue Canley Coventry
- More indoor sports facilities. All school sports halls should be available for booking by individuals/clubs after 6pm until 10pm. Any new facilities must cater for all indoor sports and therefore be of a suitable size to accommodate the largest area required by any indoor sport. A council run 18 hole golf course would also be advantageous.,
- Caludon Castle Park
- I can get health problems from having a hiatus hernia. I need to exercise when my stomach is empty. This is because I am in my early 70s.
- more cycle routes
- Protect the green spaces in CV5
- More facilities for older people
- More affordable fitness classes/group for all ages and abilities please
- Organised walks accessible from Tile Hill area
- I like swimming and would like more adult public daytime sessions to be available at Xcel
- A footpath around the edge of St Margaret's Park.
- Safe and affordable places-swimming or gym
- Example: Yesterday I walked into the city from home. The main trouble is with the close proximity to roads that have heavy traffic. The faster I walk the worse deep breathing is. The fumes, especially from diesel is horrendous, and damaging to delicate lung tissues
- Free gym pass for retired people
- I would walk more if there was less traffic
- "Reasonably priced classes in

- Willenhall/Binley"
- "If the council did not penalise participations in adult education, such as dancing, by increasing the fees required to be paid, compared to adult education in respect to other learning skills. Surely it is important to ensure people are being encouraged to be active, just as much as being tutored in other skills. Dancing has been proven to be mentally and physically stimulating, promoting social wellbeing and music therapy.
- It would also be useful if the pavements were safe to walk and run on. It appears that the focus of activity is cycle paths, which are invariably utilised by eclectic bicycles delivering fast food at between 30 to 40mph. Are any surveys carried out of use of these cycle paths, compared to the disruption caused and cost implications."
- I sometimes walk part way around The Memorial Park. This would be a great central venue for all Coventrians for classes if there were a building big enough.
- Provide an indoor bowling venue, or reopen the sports complex where it was originally in Fairfax Street. (the eliphant building)
- "Free groups for people who are 'beginners' to sports/exercise
- Introductory sessions on warm ups / warm downs / how to structure my physical activity in the best way for my health.
- If either of thr above were using the outdoor gym equipment at Caludon Castle park that would be great.
- LGBTQ swimming sessions"
- I'm grateful for new cycle routes but don't cycle to places where I'd need to leave my bike for fear of theft/ vandalism. I would cycle more if there were cycle lockers in the city centre and at sports centres.
- Group walks in Memorial Park I
- Nothing, it's down to me!
- More parks and green spaces in and around Coventry
- It would be nice to have a proper path in my local park Lakeview road, to make it more accessible for elderly people like myself and disabled people, so they could walk in the park without fear of slipping on wet grass or tripping over on uneven ground.
- I would love to see an indoor community gym in the cheylesmore community centre, I find big gyms very intimidating so I will not go, I would happily pay membership fees, the outdoor gym by Daventry Rd is great but definitely not for the winter
- Nothing, I can manage myself
- Provide indoor bowls facilities so bowls can be played all year. Although many players are elderly, this sport can be enjoyed by all age groups.
- As an older person with arthritis, having places to rest while walking or doing other exercise is important. The introduction of more benches in Coundon Park has been a welcome development, along with the pedestrian and cycle path, meaning that people can take longer walks while being able to take breaks as well. It would be beneficial to have more benches in other parks such as Lakeview, encouraging people to walk further if they know that they can rest for a few minutes if necessary.
- For adults there are not a lot of activities while children are at school. Also there are lots of things for 60+, but for 30 and more it's mostly gym)) I would love to have some more fun activities and community oriented
- Affordable public transport that arrives on time, less traffic. More gree areas.
- Would walk more if there was a local group
- Easy access to daytime team sports for the elderly.
- I like walking around the Memorial Park but the lighting in the evenings is an issue. Also facilities close early and no security patrolling, considering it is the city centres main park it could feel safer. 2 buses to get there us also a pain but would be willing if tge issues were sorted.

- I often walk down the Binley Road and especially between Bulls Head Lane and Marlborough Road the pavements are never cleaned and so from Autumn to Spring are covered in dead leaves and other vegetative detritus which rots down and makes walking unpleasant as well as often being slippery, so you get home with filthy shoes. Inexplicably, the hardly used cycle lane is regularly cleaned by ride-on sweeping machines. Another consequence of the cycle lane construction is that at least two safe centre refuges have been lost, one by the children's playground; furthermore, at the junctions with Church Lane and Bigginhall Crescent there are no crossing lights for pedestrians who have to 'do their best' to avoid traffic when crossing the Binley Road - odd that the almost non-existent cyclists get traffic lights whilst the most vulnerable road user, the pedestrian, has to make the best of it.
- As the nights get darker, I like to go for walks but only have time in the evenings but don't feel safe in Coventry anymore to go out when it's dark as a female. I live on Bennett's road and cars go down this road sometimes doing 80 or 90 mph. Numerous times I've witnessed teenagers or groups of young males ride round on dirt bikes past me in groups. This has happened around Prologis park, Keresley and Coundon Wedge and it is extremely intimidating. There is no police presence anymore so there is no deterrent.
- More aquafit places at Alan Higgs. It's impossible to get a place if you're not a member.
- A lot of my walking is on the pavements locally. Far too many cars parking and blocking the pavements. Still dodging dog poos left on pavements. Traffic pollution whilst walking is bad. Also noise from traffic wherever I walk.
- I would like to walk on Coundon Wedge by myself but I am scared of dogs off their leads.
- Make swimming or gyms cheaper
- I might play tennis more often at Memorial Park if the courts were in better condition. Some get very slippery with moss growing on them. Regular cleaning and moss treatment would help
- "More informal opportunities to run or walk in Earlsdon.
- More active groups in the magazine that comes in the autumn. LEA learning?"
- Some outdoor gym equipment in Allesley Park
- Coundon, not always safe to use parks or roads as a lone female. Activities and Council supported exercise activities tend to be during the day and not available for those who work
- Put exercise activities in Allesley Park
- Nothing, sadly. Unless you can put more money into the NHS providing treatment and care for ME/CFS. I am desperate to exercise again.
- N/A
- "Walking netball in cv5/6
- Activity groups for my age group (60's)"
- Morris common needs improved equipment for children under five ; ie baby swings and a safe slide. The equipment now is unsafe and old.
- "C25K group with run leader in Allesley Park
- Bootcamp/circuit training in Allesley Park
- Outdoor yoga/pilates in Allesley Park"
- Need to be able to combine activities with other needs, such as shopping, due to time constraints for caring duties
- I feel that the gym staff could be more engaging
- Difficult to walk at night time because of the low quality dinner LED lights so most after hours activities are no longer possible.
- I am 66. Would be good to have a subsidised gym and a session with a trainer who can show you how to use the equipment safely
- Advertise more in local magazines e.g Echo and make the information available

- Nothing, I'm just lazy or too tired, or too busy with work sadly
- Every where is too expensive or over run by men
- I would like to see a path and some benches put in around the perimeter of the park on Hepworth road binley. My parents suggested it as they often find it too muddy or if it's hot there's no shade or anywhere to sit and rest. It's a popular park and could be used by people with disabilities a bit more if it was more accessible. It would also be great if there were some circuit training obstacles or outdoor gym there too. It's a lovely park but could do with a bit of an upgrade.
- Some ladies only classes that cover the use of weights and strength building. Especially for women after 30
- Tell me where I can do chair yoga in or near Earlsdon
- More segregated cycle lanes and secure locking facilities for bicycles
- Provide articles on how to still remain active when stopping (manual) work and when part of your social group is no longer mobile
- Ensure leisure centres are open longer
- "I don't feel there is anything you can do to be honest. I need to make time each week even if it starts off small going back to my Aqua Aerobics class just so that time is for me to destress and forget about family issues for a while that would be more beneficial for my mental health and wellbeing.
- On top of all this I have a very active 2 year old Spaniel who I take out twice a day for a couple of hours so I am certainly clocking up the steps and am not worried about becoming a couch potato as you can see I haven't got the time to sit half the time."
- More flexible opening times at Alan Higgs pool. I understand that half the pool isn't accessible to the public so that schools can swim there - this is great. However the majority of times half of the pool is not being used. This makes the half that is open to the public over crowded particularly when the aqua aerobics class is in session. Could the aqua aerobics class be in the half of the pool not currently being used?
- "Keep dogs area for dog walkers separate to park (park on hepworth road in Binley),
- Keep riff raff off park,
- Kids messing around at the park always and late at night doing drugs or aresol cans left "
- Doing a charity run around tile Hill and parts of banabrook
- Nothing, physical disability
- More options available at work. Previous employer put salsa classes on for team - was good for team building fitness and fun
- There could be more group activities at our local park, the Morris Common.
- council employees having access to gym/class/swim membership
- Improve the conditions of foot paths. Unevenness prevents me walking more
- I use the memorial ark for walking as not all the parks near me are as safe - Wyken
- Reduced prices at sports centres
- how about regular walking groups for women in the cv2 area or an exercise class held in a local park on a weekly basis - Stoke Green area
- I had an allotment spot at the other side of our back garden. This spots vacancy was removed due to being taken over by Coventry University's horticultural course whereby they planted saplings. There's been no activity at this plot for nigh on 8 years and the plot is a mess. I would've cultivated this plot, but as it stands I don't know who to approach to take it over.
- I am local to Caludon and the War Memorial parks in Coventry and the Alan Higgs Centre, but health reasons have been the reason for not attending the aquafit classes lately, I walk daily alone or with my partner.
- I don't really think that there is anything you could do. I just need to sort it for myself.

- My job involves physical activity. We have a park close to our home which caters for children which is great however out door gym equipment for adults would be great.
- A pedestrian crossing on Leamington Road, near the corner of Humphrey Burtons Road, to make it safe for crossing to get to the War Memorial Park.
- Affordable gyms nearby, my post code is CV5 7BU
- "Parks, open spaces often aren't served by public transport. Nowadays things are often only publicised on the internet .
- People who rely on local newspapers read about it afterwards..
- Sorry, that's not specific, just general."
- "A publicly available squash courts free of charge (idealy in a corner or an edge of a park like Hearsall Common)
- simillar to Naul's Mill Park Basketball Court"
- Go to parks without Lycra covered maniacs on 2 wheels charging around oblivious to the older generation walking at a slower pace
- In the Autumn can we make sure all the cycle paths are cleared of leaves asap ...maybe on a fortnightly basis from early October to late Nov . The volume grows rapidly and when they become wet our grip is severely impeded with race of falling off . I use the Coundon cycle path.
- "Better street lighting for running during winter when mornings and evenings are dark.
- Another parkrun eg at Coombe Abbey as the Memorial Park parkrun is too crowded for me to enjoy. "
- Parks near by help
- Very happy with my local park and countryside-I just need the energy to use them more!
- Reduced costs
- Give me my two legs back
- I don't drive and don't live within walking distance of my nearest park (Allesley Park) and I can't afford the cost at The Wave to swim regularly. To access my nearest swimming pool which is at the Excel centre I would need to catch 2 buses into town and 2 back home afterwards
- "I'm keen to promote running to local communities - it's not an expensive sport and there are free timed run / walk events at both War Memorial park and Holbrooks park each Saturday. I can't see reference to Holbrook parkrun on the Coventry Council website. Also, there are several running clubs in Coventry and it could be useful for the Council to advertise these and to convey that they support people of all abilities.
- Please feel free to contact me on terry.moynihan@coventry.gov.uk"
- gym membership offers
- Can I have a free gym membership please
- Improve pavements in west Coventry as they are often very uneven. Stop bikes and scooters riding on pavements and in Precincts. Make it compulsory for cyclists to have and use a warning bell
- Help finding groups that i could join. Coundon and/or War Memorial Park
- i would like to swim more, but the pool is a little too far to walk and cant leave my push bike there knowing it will still be there when I want to go home
- Activities near Morrisons estate area - informal or community places
- A gym class or something that I could bring my toddler to would be great!
- Would like the park to be safer
- I would love to walk more but with darker nights coming, it doesn't feel safe to do so. Need more police out.
- Having Pilates, yoga and Thai chi classes at affordable prices and within easy reach.
- I would like to see more bike locking facilities around the town and surrounding areas as for me not knowing if there is a safe place to leave my bikes puts me off cycling to certain places even though they are short journeys.

- I'm sure an area in the War Memorial Park could be turned into a running track with lights so people could go jogging safely at night or early in the morning.
- "Stoke Flood
- Binley Woods"
- Have more ladies only activities and spaces
- Cheap or free exercise
- "I have wondered whether to try low-key swimming .
- I walk past the Wave three times a week but have never been in. "
- "More female only swimming - female changing rooms.
- Sowe valley walk to be more safe.
- More local cafes to meet up and use it as a starting place for doing things together e.g. to go off on a walk"
- I was a class at my GP's in Moor Street but it folded due to lack of members in 2019
- "Make people aware of local activities in the community.
- May be send the leaflets of various activities with the time table and support with first meeting to encourage more. "
- More discounts for employees at facilities
- Go to the schools gym
- clubs outside of school
- Swimming pool in radford
- Make child friendly areas more common in coventry as it's crime rate is rising since 2024
- nothing
- Add more space in our school, i believe we should have a new sports hall because we normal have to forge classes because of exams so if we could have more facilities also if we could have a new Astro pitch that would be amazing
- Bigger fitness suite
- A new indoor space like a bigger fitness suite with more facilities
- another indoor place like sports hall and another gym as sometimes we have to do lessons together because there is not enough space and when the sports halls are used for exams
- more space so less joining of classes so there's less people in one space
- Buy me puregym membership or JD
- A bigger gym in school and sports hall because it's not big enough and we sometimes have to clash with other students
- I don't have anyone to go with
- Newer equipment
- add new areas in our school such as a gym
- City centre
- New indoor space like a new fitness suite
- Gyms for girls specifically for 13 and up
- Memberships for gyms in radford or around radford (student membership or student access)
- Leave me alone I play football every Sunday and I'm a coach at my little brothers football team 🙄🙄🙄

- "Pay me to play football games every Sunday
- £20 please "
- Motivation, like music while you exercise, or exercise with friends or family to make it more fun.
- Longford park , foleshill
- Nothing. i'm happy with the amount i do
- Coventry parks are boring ngl
- I don't need to move more I play football
- in whitmore place next to holbrook park there is a moderate size ditch next to the flats i think it would be a nice place to convert into a playground especially because holbrook parks playground is very bad. that or renew Holbrook park or other parks
- Add in more patrol/safety features around CV5 area
- "Park at radford recreational ground
- Idek man
- Football goals with nets in parks and fields
- some more safe places when taking walks or walk home from school/work maybe?
- no where to run
- football goals
- Arranging group walks or cycle rides around War Memorial Park with a coffee and social afterwards at the cafe. Social interaction is just as important as physical exercise.
- More local groups at the memorial park, options where children can come along and/or join in.
- Promote more Informal facilities and safe places
- I would prefer to do physical activity inside so that my participation doesn't depend on the weather. More gyms are really expensive and I struggle to go enough that it's worth it
- Having more time.
- Support with transport to gym facilities and cheaper/free membership
- I think facilities wise, the city is doing a good job with keeping parks and sport places around the city and clean. However, I think to get more people to play in these facilities you need to design the place with things that could catch the people to play more. For example drawing flags or famous players etc.
- "At7 center Coventry
- ""some initiatives for free/ affordable gym memberships/ bikes
- more range of activities at local gyms eg: women's pilates or dance classes at AT7 or the wave"
- Fix the Longford park gym
- make the walking around the park more fun
- "Place I go
- Facilities
- a lot more walking at work
- Affordable housing and rent controls everywhere so that people can live near their workplaces and rely less on their cars.

- I go to choir which involves movement too. However, in my Coundon area, there are limited halls large enough for us to use. So, to motivate me to go to choir more, cheap large halls for hire in Coundon would be useful.
 - Bolingbrook road
 - I enjoy War Memorial Park as a safe area to run. Park run is a safe way to do this. However as it gets darker in the winter months I find it more unsafe to run on the roads.
 - I'm a carer as well as a parent so need something where both I can do one thing and my disabled child (mentally - moves fine by no communication ability) can do another. E.g. an enclosed area that has simple objects to climb/walk over (like soft play but outside made of wood would be perfect) as well as gym type machines like weights and pullies, rowing machine, etc. I have a long term back and foot injury so the usual running type exercise is out. I would do free weights though.
 - Playground in Moat House park would be a great idea. Go together with child, child busy and I have extra time. Around are a lot of houses and children, but no any playground.
 - I have a long commute so leave home early, and get home usually after 7pm. In the Autumn and Winter this is usually in the dark, and as a female I don't feel safe going out alone in the dark. I would love to be able to park (ideally for free, or for a small charge) further away from the centre of Coventry and walk / cycle the rest of the way into the office. I won't cycle at the moment as there doesn't appear to be any suitable routes which avoid traffic.
 - Reopen the old sports centre in town to have access to badminton courts.
 - There is a public park in Deedmore Road that does not have children's rides. You can walk and play football there. I hope they build children's rides and sports equipment that can be entertaining for children and adults also.
 - Arrange organised walks after work or at the weekend in the War Memorial Park
 - "Nauls mill park, beautiful, but i don't feel safe
 - Green park, moseley Ave. what a waste it could be amazing. Promote affordable classes ie yoga, keep fit at Local Churches/Similar venues"
 - Huge black pad off cubbington Rd maybe walk to running club?
 - Space to do a quick cycle or exercise class in work place - Coventry City Council on a regular basis
 - "Park gym in woodend would be great.
 - Walking groups for family "
 - Especially in winter when it's darker a safe Accessible place to walk.
 - Support on how to manage workload so work does not get in the way of the time I aim to be physically active.
 - "Run classes designed for people with long term pain / fatigue in different locations across the city.
 - Reduce gym membership prices/issue passes for those who might just want to swim due to pain/fatigue, at locations across the city.
 - Have special pool times for such people.
-
- I don't feel safe or confident going to The Wave or similar, due to noise levels, busyness, fast swimmers who make you feel as though you're in the way.
 - A quiet time, adult only swim for people with conditions like Fibromyalgia, Osteoarthritis, Long Covid, CFS, would be very welcomed.
 - "Make sure you can get more activities for disabled people
 - Make competitions and rewards

- The park
- "Add more activities to the park at Barras Heath Park
- Honastly i dont need help its just my ancle hurts but its getting better so im fine
- make a swimming centre that's cheap near radford
- Im not sure
- Nothing i dont like exercise
- nothing
- Nothing
- I don't know
- promote local clubs
- "More work life balance. I get home very late. Weekends I am working for the week ahead.
- More alternatives linked to my work would be great "
- Caludon park.
- Improvements have already been made on Hearsall Common-with the planting of new trees, but it does get very boggy in areas.
- Nothing I walk to and from work which is 45 mins each way. Plus other activity.
- Continue to encourage less reliance on cars - make it safer to children to get to school on bikes or by walking, improve public transport, promote events that encourage movement or promote movement in local areas,
- Hall Green Road and the roads that attach (those that go somewhere) are designed for relatively high speed traffic with large radius entrances and plenty of parking making it complex to cycle on and not appealing to walk around. There is a strip of greenery that runs from around Hall Green Road to the Hospital but it's poorly signposted and often feels like you're traipsing through people's land. Could do with being better signposted.
- Swans lane park
- Clean up the city. Invest in more areas of nature. Free parking at coombe abbey. Litter everywhere is depressing.
- Advertise what other access to exercise is available
- Local park by Butts Rugby club is somewhere I could go but not on my own.
- install outdoor gym equipment in small park on jardine crescent
- Children in Earlsdon and chapelfields would very much like to play football on Hearsall common but there are no marked pitches anymore ,which is a shame.
- More opportunities to train I attend the Foundry for their class x 2 but that's it. I want more but cannot find anywhere specifically for seniors
- "Improve paths in parks
- Keep parking free
- Would like better swimming facilities without young children all the time
- Gyms at better prices for older clients"
- Not sure
- Depends on area I guess, jogging around foleshill is difficult with how the cars are parked on footpath and quiet unclean too.
- Re-open Brandon Wood golf course
- More older adult classes at Cheylesmore cc
- Knee operation

- None in local area it's all about jogging
 - Make coombe Abbey lake fishable as it has been NEGLECTED for a few years .in my opinion it's a disgrace that it has been left to go unfishable. Years ago people came from miles around to have matches on there ,but now you will be lucky to see one angler
 - There is little anyone can do. I have access to amenities. Unfortunately, my disability impacts at random times, it is linked nerve issues.
 - Safe places to jogging esp for woman in the winter months, less working hours - perhaps a scheme for flexible working so staff can take time for wellbeing which includes gym / swim / running time.
 - "Helping with sports
 - More team work"
 - I can only do it while I have a cr. without my car I do not have any direct access to a park without catching to many buses. I have to go to town and catch another bus out again and then reverse it to get home.
 - I need somewhere to swim as early as 6 in the morning but there is nowhere near me. I travel across Coventry to Warwick uni but it isn't ideal.
 - More green spaces would be great, or making facilities more affordable.
 - I would like a strength and balance class
 - SjsHshXnshhssycffvv
 - More lighting and cameras around memorial park. Some areas are well lit around the main path but there is a whole half the park with no lighting.
 - Pavements in terrible condition vehicles parking on them
 - I'd love to be able to go the gym but not aware of anywhere that allows kids to come in and either join in or somewhere they can be looked after whilst I take an hour out in the gym. It's hard for single mums.
-
- Nothing
 - Regular walking groups or groups for exercise. Caludon castle park for example had some gym equipment, an outdoor session lead by someone would be really motivating.
 - Binley area parks needs to be safer and cleaner
 - Pay me!
 - Something in Holbrooks that is not running around the park on a Saturday morning.
 - Better and more street lighting.
 - "Some exercise classes that involve parents and children.
 - Organised walks at all our local parks- Coombe, Memorial etc"
 - I don't think there is much that Coventry City Council or any other organisation can do to help me. I live in the London Borough of Brent, and do not foresee myself going back to Coventry any time soon.
 - I'm currently limited due to rehabilitation after surgery. I'm very lucky that I have some woods near me where I can walk. I dont think there is anything you can do
 - "Allesley park. Enclosed dog exercise area for people who are struggling with recalling their dog/training them to recall.
 - Enclosed area within playground where parents with dogs can sit and still be able to watch their children where they can secure their dog so they can tend to their child for a few minutes if needed. "
 - Memorial park is good as it's free to walk around and the parking is free. I am a pensioner so don't have spare cash for luxuries like keep fit classes

- Memorial Park tennis courts are in terrible condition during autumn and winter months, being poorly maintained and dangerously slippery. This significantly reduces the amount of tennis that can be played during these months.
- I'm not really sure - possibly some sort of support on finding team sports activities in the local community that are open to solo adults?
- It would be nice if there were places around the city where people could sit and rest. The walking routes to places are not pleasant. They could be made safer, more inviting for people to sit and have a rest, or read a book. This then makes the walking routes safer as more people about.
- Chair or home or local based activities are best for me .
- Create a wonderful facility in the middle of Oakfield house instead of leaving it as a cold none used square
- I'd like to start cycling but there are no dedicated cycle lanes where I live (Longford).
- lower the cost for working people. as we should get perks for working rather than getting perks for claiming benefits.
- More lady activities
- Cheaper prices for working middle people.
- "I have some lovely places close to me but have to walk through areas - including my road, where I don't feel safe when its dark. I live on Mayor's Croft, Canley, and there is A LOT of drug dealing and street drinking. A higher community police presence would be helpful, or more cameras to discourage the drug dealers (who do more kerbside deliveries than Uber eats).
- We have a high occurrence of dangerous driving and speeding around Canley, by cars and dirt bikes. There definitely needs to be some kind of deterrence. E-scooters are also a frequent nuisance/worry on pavements."
- "Modifications to lake view park means that i don't feel as safe walking there as i used to - the mounds of earth placed along lake view road now block site of the walking area from the lighted road and nearby houses - its' even worse now at/after dusk - before this you had clear site of the houses and the street lights shone into the park - they don't now reach the areas where people walk.
- I also cycle to/from work going up four pounds avenue via canley to university of warwick - for most of my journey there are no cycle paths so i either have to ride on very busy roads (some at 40mph) or cycle on the pavement which isn't a problem if they are wide enough though leaves pose a risk for slipping in the wet weather.
- I notice that most cycle paths radiate out of the city rather than help you move around the city."
- "My nearest park is Longford Park, an amazing, beautiful space which i truly appreciate. For my parents, this was a favourite walking space, and they would have social interactions with others as they walked at the same time daily. But as their mobility decreased, they struggled with the walks. Could we have more benches so people with limited mobility (use walking aids) can have more frequent opportunities to stop? Even if not required, having the confidence that they can stop if needed would help, as that limited the routes we would take. I also know toilet blocks are hard to maintain but if there was another one available maybe near the car park off the Longford Road side that would help too.
- I often see broken glass, damaged trees and other signs of vandalism. I was part of a running club there years ago, but don't have as much confidence in terms of safety to go running in that park now, and tend to use the gym more.
- I think regular but informal events at weekends as well as weekdays would be great, a mix of bootcamp style activities or running or outdoor gym advice, that would also be a way of meeting other people and linking with them to do outdoor walks or workouts which would help with motivation and sense of security."
- Just because I am older it doesn't mean that i wouldn't be interested in activities that are considered to be for younger people, ie dancing
- I live in a rural location and have to travel 20 minutes by car to my gym so although I am active and exercise regularly I am not able to do it locally. I enjoy running but in the village where I live, running is quite limited in the winter months once it is dark as all the surrounding roads are country lanes with no lighting so I struggle to do this after work.
- safer bicycle routes, preferably traffic free or separated from the main carriageway.

- My local area is Canley. I only feel safer in a group. Most activities in my area are in the day
- "Cycling has become increasingly difficult because of unsafe / unlawful / anti-social vehicle parking. Cycle / pedestrian paths are regularly blocked. By ""blocked"", I mean they are unable to fulfil their intended function of allowing cycles to safely pass in two directions along with pedestrians. On my commute to work, along the A45 between St Martin's Road and Charter Avenue, I encounter typically between 1 and 6 vehicles parked fully off the road on double yellow lines and with no dropped kerb. There appears to be no appetite for enforcement. The alternative of riding on a busy dual carriageway is hardly attractive.
- This route is depressingly below par. E.g. 1 Junctions on to the A45 are poorly managed, with no indication that there is a cycle lane going both ways (leading to near-misses with drivers who don't look both ways, as per HC, or simply don't give way at their stop line, as per HC). E.g. 2 the southern section between Woodside Av. and Kenilworth road simply disappears on the CCC cycle map. What are we supposed to do? There's no signage indicating this. But there's also no bike box going west or alternative going east. This is not benign neglect, it's just neglect.
- New cycle infrastructure is patchy and of highly variable quality. E.g. 1 the new A45 crossings involve excessive wait times and, according to discussion on Warwick Uni's cycling group, are confusing even experienced cyclists (and, like the existing pedestrian crossing at the Sir Henry Parkes Rd junction, do nothing to stop vehicles, especially HGVs, simply blocking the crossing while waiting at traffic lights or in queues). E.g. 2 the purpose of the lanes next to Cannon Park is unclear (they don't do anything to enhance access to the actual shops).
- I put up with it, though these days I often get sufficiently hacked off that I take the car instead (for a 5 km journey! Pointless!) but my wife gave up cycling in Coventry years ago because of poor infrastructure and safety fears, and my kids have no appetite for it.
- "More cheap sessions
- More aqua sessions at Warwick uni
- Mumbai for active seniors too"
- I think there is loads of support and oppprtunities for people to keep fit. I think the investment in fitness hubs around the city has been great, and a lot of areas have parks within walking distance. Facilities in these places are good. There are lots of clubs with youth sections and positive people encouraging young people to get involved.
- More varied and accessible classes on the evening with taster sessions for some of the popular ones.
- I tend to stay away from activities in the city centre. I don't feel safe walking into town and around town on my own
- Activities that I could do wit my child.
- Make access to gyms more affordable.
- Would like a training partner/buddy for the gym.
- Feeling safer in my local area, especially in winter as I struggle to go out when it's dark
- More afternoon classes
- Better pavements safer streets better lit
- Nothing
- More lit areas , in spon end around Cumbria Close so its not dark if a person is on own
- N\A
- More local equipment in parks
- Supported places
- Get rid of electric bikes and scooters
- I'm okay getting about at the moment.

- Ensure the memorial park remains free parking for three hours... I go there daily if you are to bring in pricing, I will no longer be able to afford to go there
- create a more connected network of greenways through the City, for cycling and walking. Cycling for leisure, using our dangerous and polluted roads is no fun at all and extremely off-putting. Also through the City Centre (along the lines of the ancient east/west routes and north/south routes through the City). Even around the inside or outside of the ring road perhaps? Improving access from City Centre to St. Nicholas Street, the Canal Basin and beyond needs urgent attention that bridge over the ring road is extremely off-putting for visitors, pedestrians and cyclists alike. Improvements also required at Mile Lane/Quinton Road/Park Road/Parkside junction. Open up these thoroughfares rather than keep creating 'dead-end' which only result in 'dead areas'. Queens Road to Central Six and beyond to Spencer Park the same. I could go on.
- More local and mixed from all back ground community events. Please
- "My activities are primarily walking and going to the gym. In terms of walking, I feel like the city meets that need well and I have plenty of places to walk around if I want to. In terms of gym, subscriptions can be quite expensive even for the cheap ones, so it will always have to be the only physical activity that I have to pay for as I could not afford to have gym and another paid activity. That means any other activity I would want to try needs to be free, which is difficult to find locally or at an appropriate time after work. I would love to be able to find groups that organise different types of physical activities for free in my area, but I wouldn't know where to look.
- Another activity I would love to be doing more is cycling, but the lack of cycle lanes makes it very difficult to do that here. The existing cycle lane on my road (Coundon Road) ends in a very awkward spot and doesn't even link to the retail park or to anything at all, and so I don't have an incentive to take my bike out of the house to get places as I would have to cycle on the road for most of the time, which to me feels incredibly unsafe. As such I have a bike that I keep in the shed. "
- create an outdoor space in Earlsdon
- "Allesley park area. Would be good to have pilates at community centre again or another local space.
- Village hotel or similar to gave a swim only membership rather than one that includes gym that I'm not interested in "
- Free gym sessions one to one to set a suggested programme and reduced rates to continue.
- I don't think the Council could do anything more - it's up to me to find the motivation
- More water based activities on the evening for adults
- Reduce the cost of membership to the gyms, £43 a month is far too high. I'd be able to pay about £200 for a year.
- More activities in Binley Green and highlight/promote them.
- Knowing people around the area and group activities other than classes.
- N/A
- Motivational guidance, hints and tips to get started and continue to progress
- nothing really as I already run or walk around campus
- "In Birmingham there are a lot of ladies only classes, swimming activities etc which enable better access
- Also I work for the Cov Council and am hybrid working, if there was the option to allow workers to access gym or fitness etc during work hours which could logistically be made up later in the day then this would allow easier access. Gyms first thing in the morning are not possible due to child care and school runs, and by the evenings we are exhausted. the times we would have the energy are during work hours, but even if we could be given say 1 hour in the morning to get fitter, it would help immensely with staff being healthier etc. "
- Easier booking at sports centres - having to ring up to book adds an additional barrier for me. It would be so much easier if I could access an easy online booking platform that removes the hassle.
- "Set up local projects that takes all the points stated above into consideration....

- Cost, local accessibility, cultural issues, people with lack of self esteem etc etc.
 - I live in Willenhall and it's difficult to come back from work and go somewhere like Allan Higgs but it's equally difficult to take a walk in the evening because the streets don't feel safe, especially now with"
 - The pavements where i live are very uneven, savings slabs broken. Bredan Ave especially. Plus the path by Coventry Saracens facing 15 Falcon Ave are as bad. I have already fell and broke ribs vefore
 - Safe streets, facilities and organising groups
 - Accessible dog free spaces
 - For any local residents they should have the joining fees removed from gyms as this is a deterrent
 - "Price
 - Swimming and other fitness classes are so expensive with Ccc
 - Private simple gym is £24 a month which for gym and classes is a going price but I travel 20 minutes away
 - When other places nearer like all the secondary schools which use to have adult ed now offer nothing!
 - Surely exercise should be free/cheap accessible to reduce the NHS pressures."
 - More organised activities in Memorial Park.
 - More activities promoted, group activities for beginners
 - More local facilities or volunteer led walks or outdoor activities
 - I would prefer a location I could walk to. I am in CV6 6BD.
 - "It would be great to see more focus from the council on promoting physical activity and raising awareness of what is already happening locally. I am fortunate to live near Longford Park, which is a lovely place to walk or run, especially in the mornings. However, in the evenings there can sometimes be issues with antisocial behaviour from groups of youths, which can feel intimidating and discourage people from using the park.
-
- One positive example is the Longford Striders RunTogether group, who do an excellent Sunday social run from Longford Park most weeks. Joining them has really helped me stay active, as having the safety and motivation of a group makes a big difference. It has also encouraged me to explore some lovely local routes that I would not normally run on my own. It would be great if Coventry City Council could support and promote more initiatives like this, with community based, inclusive and regular opportunities that make it easier and safer for people to get active in their local area."
 - Stop charging so much for after school care and school clubs then maybe I can get my child involved in other activities whilst getting some more free time to myself to be more active!!
 - A free or affordable gym in my locality or a network of people trying to get fit doing it without judgement
 - We would like a pump track and a flat scooter road in the memorial park.
 - Make parks like the morris park have exercise equipment
 - light exercise classes for people with disabilities
 - Memorial Park toilets used to be open until 6pm. After lockdown, it changed. Would be happy to pay for an access card, or a nominal charge to use it out of hours.
 - Its me. Ive slowed doen now Im old
 - More hard pavements across green areas. In winter it gets too boggy
 - Update play grounds in parks. All outdated need re designing.

- Planned walks in Earlsdon
- "I just don't feel safe in
- My neighbourhood. Fear of knife crime, being a women being attacked and dragged somewhere but can't carry anything to protect myself. Also dogs being about and not under control."
- Safe well lit places at night to run
- support from qualified trainers and special places for spine rehabilitation
- Dedicated walking routes around the city that were traffic free.
- I have started running three times a week in Longford park around 6.30pm. I don't feel safe but I need to do it for my mental health. More lights and car park being open later would really help.
- "More women's only sections
- ""Street lighting
- Accessible paths
- Free car parks
- Better public facilities for swimming that are advertised"
- Bettter running routes would be helpful. Paths are often blocked by parked cars and canal towpath has dogs not always under control of owners.
- Make a cycle lane in The Memorial Park
- The wyken slough needs to have wider footpaths. The existing one is too narrow and uneven.
- Indoor facilities, classes for over 60s that are afgordable
- "I hadn't done any exercise in 5 years after covid but recently joined Longford Striders Couch to 5K running group as I wanted to start running again.
- Their group is amazing, only £20 and so freindly, after 6 weeks of running with this supportive group I'm now running continuously for 30 minutes, x3 times per week. I've already asked to join their group on Sundays after the course finishes. I've also found running buddies and we run around Longford Park twice a week together, plus join Longford Striders for the group run on Sundays.
- Longford Park is only s short walk from my house in Brockenhurst Way so i know I can get there without a car (we have a car but use it as little as possible to save money on fuel).
- I now feel amazing and have also given up smoking again after starting again during covid."
- The lighting on our streets for walking/running and uneven pavements
- Safe, accessible and free activities, often doing exercise is quite expensive, e.g. hiring sports courts.
- More safe accessible community growing spaces like The People Patch at the Alan Higgs centre
- more local gyms
- "I live near Longford park, it would be great to have a more gym facilities here in the park as the gym membership is too expensive.
- There is also only one women's gym near my area (but on Foleshill Road) more gyms for ladies would be very beneficial, OR another alternative to ladies gyms is having more women only keep fit classes, either indoors or somewhere safe outdoors withing Linford park. For example I have been told by my physiotherapist that doing regular pilates would be good for my lower back pain but there is nothing at all available in my area.
- In my opinion Longford Park has huge potential to attract local community to become more active but there are only two muggas, we could have a tennis/badminton muggas too. I normally travel with my children over 30 min to play Tennis elsewhere but the cost of transport is expensive so we have stopped playing tennis.

- Also more groups like 'Stride for Longford running group' is very popular so we should have more funding being put in place for similar types of local groups. "
- I am the P.E lead at Tiverton Send school. We need more activities and places for Send children to take part in activities.
- "Tile hill area
- For families that have children with additional needs
- Fenced, gated playgrounds, parks that child couldn't run off
- Safe places in Willenhall that i can go with my SEND child
- Children in our community when play outside other residents keep complaining unnecessary and making false claims that children (under 15) even if children being innocent just playing around to keep them active and away from gadgets. Thus, kids doesn't feel safe or constantly being under pressure. Thus, even if kids wish to play during term break they prefer not to go outside to avoid any new complaints.
- We live on burnaby road, i have mobility issues and have autistic children. Not many parks are at a close walking distance. And mostly not many places are autistic friendly. Specially during holidays all the kids places are so crowded we can't access them safely.
- There is no park in my area, even kids can not find places to play.
- The old sports centre used to have toning tables which kept joints moving without exacerbating conditions. When that closed there was nothing similar available.
- More wheelchair accessible gym equipment
- Guided walks, but at a leisurely pace - I'm worried about not being able to keep up Area: CV3; Quinton Pools, London Road cemetery, Charterhouse Fields.
- More guided public, ideally open space activity in parks, such as Tai Chi, step and body movement activities.
- Exercise equipment in public parks
- Well I mostly do walking while I'm working as it's a part of my job role and in the morning I do regular exercises. I sometimes go for running outside as my wish. So for me I'm all comfortable with everything I'm doing.
- Safer public walkways
- Create more cycle paths, making it even safer for cyclists
- Better lighting in local park which is St Margaret's Park, Ansty Road. I worry about crimes like drug dealing in cars parked nearby. Also dog mess can be an issue if out walking. Caludon Park is nicer but a bit further away. The park looks run down. Could the community notice board be updated. It has been vandalised with something.
- Better lit roads/park. Tamworth Road, Coundon Hall Park
- There's a portion of the pavement by Holyhead Road (about number 346) that gets very muddy when it rains. Can be off-putting when deciding whether or not to run or walk to Morrisons etc.
- I use the War Memorial Park but it needs lighting all the way round to make women/girls feel safe
- Nothing available in my area.
- Bring back adult education fitness classes. Group classes for seniors of keep fit, yoga, chair yoga, slow zumba, dance in the Stoke area or the city centre.
- Ernesford grange
- "I wish there would be just 1 indoor court at Alan Higgs center because it is impossible to book a court at the Warwick Uni so I am forced to drive to Birmingham just to play.

- Sauna access while events on the weekend would be nice as well."
- I live by Queens Road, Westminster Road and The Butts and I never go out on my own now. I feel so vulnerable around here. There's never any police presence so all the homeless drunks, druggies and the kids terrorising everywhere in balaclavas riding bikes, doing wheelies in the roads just get free reign. I'm vulnerable because of my disabilities, I can't get away from them when they come to me begging and they're volatile when high or drunk. It's no fun. I wish there was an obvious presence here so they would move away from here. I don't even go to the shop now to buy milk for eg as they're always sat in the doorways begging and then there's the taking drugs and dealing. I'm scared someone will try to rob me. Also Upper York Street is a haven for fly tipping. It's just not a nice place to go walking/rolling anymore. The drug taking/homelessness is a real issue, they've even got into our flats before and left all their sleeping stuff and drug paraphernalia and litter on our landings. There are churches around here that could maybe offer facilities but I'd have to walk to them to get there which I won't do.
- Safer places to go. Memorial Park is unsafe especially for solo women
- "I am keen to cycle to and from work, and I did this for a couple of years, however after repeated near misses by cars, I had to stop. Cycle Route 11 looks ok when you see it on the map, from Coventry City Centre to Warwick University, however there are multiple problem areas. It's difficult to believe it's actually a defined cycle route. The roundabout at Cannon Park is where I've had many near misses, and my colleague was knocked off his bike and hospitalised in 2024. Sir Henry Parkes Road from Canley Railway station to the A45, there are lots of close passes and near misses. To avoid the roundabout by the Fire Station, you need to divert to use the pedestrian crossing, however cars on the A45 regularly drive through both sides despite there is a red stop light. Getting out from the City is problematic. The subway at Spon Street isn't nice for women cyclists at the best of times, never mind during winter months. Kingston Road - close passing is a problem, because cars are parked on both sides of the road, so cars squash past cyclists.
- With thousands of Warwick students living in Coventry City Centre, it's disappointing there isn't a safe route to and from campus. "
- "install more outdoor gyms
- all citizens have free public access to a bicycle (eg. bookable on council website)
- ban fast food adverts in public locations (eg. billboards/bus stops)"
- Improved lighting and ideally green walkable links to places. Cycling proficiency to build confidence using the new cycleways. Support groups and spaces running affordable ways to get out and about on different days and times not just weekdays - perhaps using green spaces. Reduced or subsidised access to local facilities such as parks and gyms with better weekend class provision. My nearest gym is probably David Lloyd - would be walkable to and from it - however couldn't afford to go there.
- A community running track with lights and gym attached maybe near the city centre or in a less polluted area with a regular free bus service there
- Coventry needs more curated spaces of beauty that are free to access. I used to live in Wolverhampton and their West Park was a wonderful place to walk around for exercise. Somewhere with gardens to enjoy, clean and clear paths, free parking nearby. The war memorial park is ok for this but it's just grass and trees, it needs more garden spaces.
- Only time that I walk is to come into town. More benches to rest in town
- More activities for the older generation
- Nursery and kids club while parents can use the gym would help
- I am a pensioner living in Cannon Park, I would like easily accessible information about where and when activities or walking groups meet or are available near to me.
- A safe walking circuit has been created in my local park - Coundon Park
- Cost of parking
- Stop the electric bikes in the pavement throughout the city centre. They nearly hit lots of people and it's worrying as you get older.

- There are no safe accessible parks, too many gangs, rubbish, rats, men with knives and dog walkers that do not have their dogs on leads. The parks have been neglected by Coventry city council. Children are not safe to play in the streets. There are very few affordable clubs, the Coventry council stopped children's youth clubs. There is always money to house illegals but none for our services.
- Gym equipment in public
- More accessible facilities in city centre where I work.
- Roads like Banner Lane, Broad Lane, and Tile Hill Lane desperately need quality cycling infrastructure and pavement widenings. It's not a good experience walking or cycling in the area.
- None
- Sowe valley wild space for recreation
- More variety of group activities to join for example walking groups various times at war memorial park
- Help me get out of my house back into the community and advise me on suitable gyms at affordable prices
- "Cycle routes that join up as opposed to starting & then suddenly disappearing.
- Is it permissible to cycle around parks? I know that when I was young it was prohibited to cycle on footpaths in a park. Is it still the case?"
- Additional walking groups with TileHill and the surrounding area. I'd off road walking.
- Build a multifunctional sports and events venue in the city centre where people can get active and host team sports, national/international competitions and events that will bring people into the city. Sports and entertainment provision in the city is appalling.
- Notbsure
- I would do more walking but the evenings are the only time I have to do this. Now the nights are dark safety is a concern.

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Public report Cabinet

Cabinet

17 March 2026

Name of Cabinet Member:

Cabinet Member for City Services – Councillor P Hetherton

Director approving submission of the report:

Interim Director of City Services

Ward(s) affected:

All wards

Title:

Transport Capital Programme 2026/27

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 the Highways and Transport capital programme for 2026/27, which includes a £2.5m programme of Local Network Improvements, an £11.3m programme of Highways Maintenance, a £5.8m programme of Active Travel schemes and a £1.5m programme of new electric vehicle charge point installation. 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), tranche 5 of the Active Travel Fund (ATF5), the Active Travel Integrated Settlement (ATIS) and the Local Electric Vehicle Infrastructure fund (LEVI).

Recommendations:

Cabinet is recommended to:

1. Approve delivery of the 2026/27 programmes of Local Network Improvement schemes and Highways Maintenance schemes, as set out in Appendices 1 and 3 of this report
2. Accept £4,116,382 of funding from the Active Travel Integrated Settlement and £250,000 from the Walk Wheel Cycle Trust and to approve the delivery the schemes listed in Sections 2.29 to 2.31 of this report
3. Review the latest updates on various other capital schemes also due to be delivered during 2026/27.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Local Network Improvement Programme scheme list

Appendix 2 – Description of Highways Maintenance schemes

Appendix 3 – Highways Maintenance programme scheme list

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?

No

Will this report go to Council?

No

Report title: Transport Capital Programme 2026/27

1. Context (or background)

- 1.1. The Coventry Transport Strategy was first approved by Council in December 2022, before being updated in October 2024. It is a 15-year Strategy which sets out plans to fundamentally change the city's transport system by investing in significant improvements to public transport, walking and cycling and by accelerating the transition to zero emission vehicles.
- 1.2. To achieve this the Council maintains a 'pipeline' of planned improvements to the transport system, which will be delivered over the lifetime of the Strategy. This includes, for example, improvements to public transport, such as the introduction of Coventry Very Light Rail (CVLR) and potential new railway stations, the building of new segregated cycleways and improvements to key junctions. In addition to these major schemes, the Council also delivers a rolling programme of Local Network Improvement and Highway Maintenance schemes on an annual basis.

2. Options considered and recommended proposal

Local Network Improvements (LNIP)

- 2.1. Improving road safety is a priority for the Council and good progress continues to be made, with rolling three-year data showing a 43% reduction in personal injury collisions and a 48% reduction in casualties occurring on roads within the city over the last 10 years (2015-2025). Notwithstanding this progress, it is recognised that there is still much work to do to make our roads as safe as possible for everyone.
- 2.2. The Government, recognising the challenges faced by Regional Road Safety Partnerships across the country, launched in January of this year its first Road Safety Strategy in over a decade. The strategy contains ambitious targets of reducing the number of people killed or seriously injured (KSI) by 65% by 2035, with a specific 70% reduction target for under 16s, which is also a target group for the Authority. This also complements TfWM's existing target of halving the number of deaths and serious injuries on the region's roads by 2030.
- 2.3. Several key consultations and announcements have been made alongside the launch of the new Road Safety Strategy, including proposals around introducing changes to driver licensing and training requirements, amendments to enforcement levels and penalties as well as changes to the legislation governing pavement parking. Whilst we await further details of the scope and extent of any changes proposed to pavement parking, noting the level of concern from residents across the city, initial scoping work will be undertaken in 2026/27 in preparation for any future changes in legislation.
- 2.4. Each year, as part of our ongoing monitoring process, injury collision data (as collated by the Police) for the Coventry transport network is reviewed and analysed. From this, a prioritised list of locations where further investigation and interventions may be considered is produced. The schemes that result from such investigation form part of the annual LNIP programme, alongside initiatives which are intended to 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. This evidence led approach ensures resources are targeted at locations where there is the potential to achieve the most positive outcomes.

- 2.5. Funding for the LNIP currently comes from the City Region Sustainable Transport Settlement (CRSTS). CRSTS is a capital funding settlement between the West Midlands Combined Authority (WMCA) and central Government. It is currently the largest source of funding for transport improvements in the region and is worth £1.1bn over a five-year period. 2026/27 is the final year of this settlement.
- 2.6. In 2026/27, the City Council will receive £2,453,202 of CRSTS funding from WMCA to deliver the LNIP programme. The table below provides a high-level summary of how it is proposed to spend this funding.

Programme/ scheme	Description of works included	Cost
Local Safety schemes	Road safety interventions based around priority sites including, site investigation, 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)	£623,000
Vulnerable users	Measures focused on improving the safety and experience for vulnerable road users. This includes pedestrian improvements, new crossing facilities and school related initiatives such as 20mph speed limits	£390,000
Traffic management	Provision of schemes and initiatives to aid the operation and efficiency of the network. This includes junction improvement schemes, moving traffic enforcement, traffic regulation orders and minor community lead interventions	£849,801
Urban Traffic Management and Control	Urban Traffic Management and Control focused enhancements and upgrades. This includes LED upgrades to existing sites, including energy efficiency and operational improvements, upgrade of portable variable message units and the upgrade of crossing sites with installation of pedestrian crossing facilities	£300,000
Major Scheme Development	Development of future schemes including, for example, carrying out traffic surveys, traffic modelling and scheme design	£290,400
TOTAL		£2,453,201

- 2.7. Average Speed Enforcement (ASE), delivered in partnership with West Midlands Police (WMP), will remain a central element of the Council's road safety programme in 2026/27. Coventry already operates one of the region's most extensive ASE networks, with 18 corridors covering approximately 45 km of roads. Subject to WMP support, this network will be further expanded in 2026/27 and beyond.
- 2.8. Across the 18 ASE corridors, Killed and Serious Injury (KSI) collisions have reduced by 84% since the systems became operational. Whilst further time will be needed to establish and demonstrate longer term trends, these early results suggest the strong and positive safety impact that such interventions can bring. Phase 7 of the ASE initiative will come forward in 2026/27 and will see ASE introduced on a further 3 new corridors across the city.

2.9. The Council will continue to prioritise initiatives that support vulnerable road users, particularly young people, through a strengthened programme of school-focused interventions in 2026/27. This will include the continued expansion of the School Streets Programme, funded through the ATF5 and ATIS funding streams (covered in more detail in sections 2.26 – 2.30), alongside enhanced pedestrian facilities and the introduction of 20mph speed limits outside schools. Building on the 2025/26 trial of School Keep Clear cameras, further measures to improve compliance with school-based parking restrictions will also be investigated, informed by the current trial underway. Together, these initiatives form an important part of the Council's wider commitment to improving safety and speed compliance at and around school sites.

2.10. Additional priority themes for 2026/27 are detailed below:

- The Vehicle Actuated Sign (VAS) programme will be further expanded in 2026/27 including both fixed and mobile signs. This initiative forms part of a broader package of community focused traffic management measures delivered through the LNIP
- Provision for Traffic Regulation Orders (TROs) will be increased in 2026/27 to accelerate scheme delivery and better manage the rising level of demand within the service. A review of the Residents' Parking Permit scheme will be undertaken to ensure it continues to respond effectively to increasing demand and that the eligibility criteria remain appropriate
- Following the evidence led 20mph speed limit review completed in 2025–26, targeted interventions will be brought forward in 2026–27 at priority locations across the city to improve safety for vulnerable road users
- The programme of upgrades to enhance pedestrian crossing facilities will continue in 2026/27, improving safety, accessibility, and crossing facilities at priority locations across the city using a combination of ATF5, ATIS and LNIP funding.

2.11. A list of the specific locations where work is proposed to take place under each of these headings has been provided in Appendix 1.

2.12. The city's Urban Traffic Management and Control (UTMC) system - comprising signal-controlled junctions, pedestrian and cycle crossings, CCTV monitoring, and variable message signs - remains vital to the effective management of the road network. Ongoing investment will continue and ensure that systems remain modern, resilient, and capable of supporting the Authority's network management responsibilities.

2.13. Details of the UTMC investment programme for 2026/27 are also set out in Appendix 1. Planned measures include improvements to communications infrastructure, adoption of intelligent transport technologies, and physical upgrades such as installing pedestrian facilities at junctions where none currently exist. Several elements of the programme are multi-year by design and will continue across financial years as required to support delivery.

2.14. Cabinet is recommended to approve delivery of the schemes in Appendix 1. If these are not approved in their current form, there would be a delay in starting the programme to allow further work to place. Any schemes not delivered within the

2026/27 funding window would subsequently be rolled forward for progression in future years.

Highways Maintenance

2.15. Highways Maintenance includes repairing roads and pavements, as well as carrying out preventative maintenance. Coventry have recently been named as one of only 16 councils in England to receive a 'Green' rating from the DfT for highway maintenance best practise, condition and spend.

2.16. CRSTS also includes funding for highways maintenance. However, 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 remaining CRSTS allocation for Highways Maintenance in 2026/2027 is £3,836,400.

2.17. In addition to this, a further £2,000,000 of CRSTS funding has now been made available in 2026/27, following a rebasing exercise carried out across the programme. This funding will be further supplemented with £1,538,160 secured from DfT, £1,969,000 of local funding and £2,000,000 Right to Buy receipts from the Citizen Housing Group, which will be used to provide a further programme of highway improvements in and around Citizen estates.

2.18. This provides a total budget of £11,343,560 for the 2026/27 Highways Maintenance Programme, although it should be noted that, due to the end of the LiveLabs programme and without some extra TfWM funding which was received in 2025/26, the total funding for 2026/27 is projected at 19%/£2.1m lower than was received in 2025/26. The table below provides a high-level summary of how it is proposed to spend this funding, with more detailed descriptions of the types of works which will be carried out under each heading being provided in Appendix 2.

2.19. The proposed programme focuses on ensuring that the highest ranked roads and pavements across the city are properly repaired and that preventative maintenance is carried out in line with the criteria set out in our Highways Infrastructure Asset Management Plan (2025).

	CRSTS	CRSTS rebasing	DfT funding	CCC funding	Citizen	TOTAL
Major patching	£461,840	£458,160		£200,000		£1,120,000
Resurfacing	£850,000	£861,840	£988,160			£2,700,000
Surface treatments	£320,000	£450,000	£350,000	£230,000		£1,350,000
Footway improvement schemes	£829,560	£130,000	£100,000	£639,000		£1,698,560
Retread	£475,000					£475,000
Verges		£100,000				£100,000

Vehicle safety fence	£150,000					£150,000
Structures	£550,000		£100,000			£650,000
Drainage surveys/ maintenance	£200,000			£900,000		£1,100,000
Citizen					£2,000,000	£2,000,000
TOTAL	£3,836,400	£2,000,000	£1,538,160	£1,969,000	£2,000,000	£11,343,560

2.20. A full list of roads and footways where work is proposed to take place under each heading has been provided in Appendix 3. Cabinet is recommended to approve delivery of these schemes. If these are not approved in their current form, there would be a delay in starting the programme to allow further work to place. There would therefore be a risk that not all work would be completed before the end of 2026/27.

2.21. It should also be noted that, in addition to the above, the Council is also seeking Local Levy and Grant in Aid (GiA) funding from the Environment Agency (EA) and the Regional Flood and Coastal Committee (RFCC) to deliver additional flood alleviation schemes. If secured, the funding will be used to provide further improvements including Natural Flood Management and Property Level Resilience during 2026/27.

Other major capital schemes

2.22. As noted in Section 1.2, the Council maintains a 'pipeline' of further improvements which will be delivered over the lifetime of the Coventry Transport Strategy. This is available on the Council's website at <https://www.coventry.gov.uk/transport-strategy-2/coventry-transport-strategy-implementation-plan>

2.23. No changes are proposed to the existing pipeline of schemes at this time. However, Members are likely to be asked to approve a significant update to the Strategy later in 2026. This will be required as the current Implementation Plan is largely focused on the first five years of the Strategy – 2022/23 to 2026/27 - linked in to the CRSTS funding. With this period now coming to an end, the planned update will provide more detail about the schemes that will be delivered in the next five-year period.

City Region Sustainable Transport Settlement (CRSTS)

2.24. The planned update to the Coventry Transport Strategy also coincides with the end of the current 5-year CRSTS funding period in March 2027. It should be noted the following schemes, funded through the CRSTS programme, are therefore also expected to be delivered during 2026/27:

- The next phase of the CVLR Demonstrator Project, enabling further on-road testing to be carried out between Coventry Railway Station to Coventry University Technology Park, following on from the successful On-Road Test completed in the city centre in June 2025.
- The remaining elements of the Foleshill Transport Package - a package of measures intended to promote walking, cycling and public transport around the Foleshill Road local centre.
- The remaining elements of the Coventry South Transport Package – completing the construction of a segregated cycleway on the Humber Road/London Road

corridor, as well as various junction improvements on this and the adjacent A444 corridor. During 2025/26 the section of cycleway between Asda Roundabout and Abbey Road was completed, and construction of the Humber Road cycleway commenced.

- Phase 1 of the Tile Hill Railway Station improvements scheme, aimed at improving access to the station by walking, cycling and bus.

2.25. CRSTS will be succeeded by the Transforming City Regions (TCR) fund. TCR is a £2.2bn regional programme covering the period 2027/28 – 2031/32, providing the main source of capital funding for transport programmes within the WMCA area. This will include funding for both the LNIP and Highways Maintenance programmes for the next five years and funding for various further transport projects to be delivered across the region over the same period. The WMCA Board will be considering the TCR programme in early 2026, and the approved programme will inform the planned update to the Coventry Transport Strategy later in 2026.

Active Travel schemes

2.26. In addition to the above, the Council has successfully secured funding from several sources to deliver various active travel schemes during 2026/27.

2.27. £1,467,730 has been secured from Tranche 5 of the Active Travel Fund (ATF5). Of this, £1,387,730 is intended to deliver new/improved crossings at various locations across the city. The remaining £80,000 is intended for the delivery of two further School Streets schemes, at Limbrick Wood and Holbrook Primary Schools.

2.28. Details of potential ATF5 schemes were previously provided in the 2025/26 Transport Capital Programme report. In March 2025 Council approved a recommendation 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 ATF5 funding for these schemes, to add them to the five-year capital programme and to approve their delivery.

2.29. £4,116,382 has also been secured from the Active Travel Integrated Settlement (ATIS) fund. The table below provides a summary of the specific schemes that this funding is intended to support.

Scheme name	Scheme description	Cost
City Centre Cycleway	Segregated cycleway connecting Coventry Railway Station and Pool Meadow Bus Station using the Greyfriars Road/ Queen Victoria Road/ Corporation Street/ Hales Street corridor	£1,612,605 (supplements funding previously secured via the Active Travel Fund)
Westwood Way Cycleway	Segregated cycleway serving the Westwood Business Park, between the junctions of Westwood Way/ Longwood Close and Westwood Way/ Kirby Corner Road	£1,361,213 (supplements previously secured S106 funding)
Coundon Wedge Drive Cycleway	Extension of the existing segregated cycleway to cover the full length of Coundon Wedge Drive	£172,564 (development funding only)
School Streets Programme	Delivery of two further School Streets schemes (locations to be confirmed)	£120,000

Crossing Improvements Programme	Delivery of new, or improvements to existing, pedestrian crossing facilities at the following locations: • Cox Street at Swanswell Street • Allesley Old Road at Queensland Avenue • Aldermans Green Road at Eburne Road • Wildcroft Road at Whoberly Hill Primary School to Raphael Close • Woodway Lane South of junction with Wigston Road • Albany Road at Broomfield Road • Old Church Road at Henley Road	£850,000
TOTAL		£4,116,382

2.30. It should be noted that the ATIS funding for the extension of the Coundon Wedge Drive Cycleway is only intended to cover the cost of developing the scheme and that further funding will be needed to meet the cost of constructing it. Therefore, this scheme will not be delivered in 2026/27, unless additional funding is secured from another source.

2.31. Finally, £250,000 has been secured from the Walk Wheel Cycle Trust (formerly known as Sustrans). This funding is intended to deliver a new signal-controlled crossing on the University of Warwick's campus on Gibbett Hill Road, close to the Gibbett Hill Road/ Library Road junction.

2.32. Cabinet is recommended to accept the funding from ATIS and from the Walk Wheel Cycle Trust and to approve the delivery these schemes.

Local Electric Vehicle Infrastructure (LEVI) fund

2.33. £1,512,000 has also been secured via the LEVI Pilot Project to deliver four residential charging hubs. The schemes will see a mixture of rapid and overnight charging facilities installed at the following locations during 2026/27:

- Wellington Street Car Park (accessible 24 hours)
- Warwick Road Car Park (accessible 24 hours)
- St Christophers' Primary School Car Park (overnight charging only)
- Jardine Crescent Library Car Park (overnight charging only).

2.34. However, it should be noted that WMCA, rather than Coventry City Council, is the accountable body for this funding.

2.35. In addition to the above, WMCA will also receive £14,549,000 from the LEVI Capital Fund to deliver further additional public charge points across the region between 2026/27 and 2031/32. Of this, £1,818,625 is expected to be spent in Coventry, with work commencing during the coming financial year.

2.36. Cabinet was previously briefed on plans to bid for LEVI funding in July 2022. In the event that funding was secured, Cabinet agreed to delegate powers to the Director of Transportation and Highways (subsequently replaced by the Director for Economic Growth), in consultation with the Cabinet Members for City Services and Jobs,

Regeneration and Climate Change, to add the LEVI schemes to the 5-year capital programme and to approve their delivery, including procuring and entering into contracts with charge point providers.

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.
- 3.2. 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 and 3 and in Section 2.29 – 2.31 of this report will all be delivered over the 2026/27 financial year.
- 4.2. Schemes referenced in Sections 2.24, 2.27 and 2.33 are also expected to be delivered over the 2026/27 financial year, although updates on these schemes are provided for information only.

5. Comments from Director of Finance and Resources and Director of Law, Governance and Safer Communities

5.1. Financial Implications

Approval is being sought to deliver a programme of Local Network Improvements, Highway Maintenance and Active Travel schemes over 2026/27. The total cost of these schemes is £18,163,144, comprised of:

- £2,453,202 for Local Network Improvements
- £11,343,560 for Highway Maintenance, and
- £4,366,382 for Active Travel schemes.

Both the Local Network Improvement and Highway Maintenance programmes are fully funded, with most of the funding coming from CRSTS, while funding for the Active Travel schemes has been secured mainly from the Active Travel Integrated Settlement.

Updates provided on other capital schemes due for delivery during 2026/27 are for information only.

The Transport Capital Programme detailed within this report is consistent with the City Services element of the 5-year Capital Programme.

5.2. Legal Implications

The Council is under various statutory duties relevant to this report. These include:

- (a) Maintaining the City's adopted highway network and associated structures;
- (b) Maintaining the City's traffic management infrastructure;
- (c) Managing the City's road network to secure the expeditious movement of traffic;
- (d) Promoting/encouraging safe, integrated, efficient and economic transport facilities and services in conjunction with TfWM;
- (e) Investigating road accidents and introducing measures to reduce their recurrence;
- (f) Producing a definitive map recording all public rights of way in the City;
- (g) Acting as a 'risk management authority' in respect of highway drainage for the purposes of the Flood and Water Management Act 2010.

The delivery of the proposed schemes is therefore intended to ensure that the Council meets these statutory duties.

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 the programmes referred to in this report. Where the delivery of these programmes requires 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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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 the next phase of school streets.
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.

Ref	Theme	Project	Scheme Title	Description
LNIP26/27-01	Local Safety Schemes	Local Road Safety Improvements	Radford Road between Lawrence Saunders Rd & Beake Av	Delivery of advertised pedestrian and road safety enhanced
LNIP26/27-02	Local Safety Schemes	Local Road Safety Improvements	Donnington Avenue	Road marking improvements
LNIP26/27-03	Local Safety Schemes	Local Road Safety Improvements	Lower Eastern Green Safety Improvements	Delivery of safety measures at Lower Eastern Green Ln, Alspath Ln, and Alderminster Rd
LNIP26/27-04	Local Safety Schemes	Local Road Safety Improvements	Street Lighting Improvements	General lighting enhancements to aid traffic and pedestrian safety
LNIP26/27-05	Local Safety Schemes	Local Road Safety Improvements	Poole Road/ Lawrence Saunders	Signage improvements to influence driver behaviour
LNIP26/27-06	Local Safety Schemes	Local Road Safety Improvements	William Bristow Road	Lining improvements to influence driver behaviour
LNIP26/27-07	Local Safety Schemes	Local Road Safety Improvements	Bollarding Initiatives	Community led enhancements to aid network management
LNIP26/27-08	Local Safety Schemes	Local Road Safety Improvements	Lentons Lane	Phase 2 of safety improvement scheme**
LNIP26/27-09	Local Safety Schemes	Local Road Safety Improvements	Longfellow Walsgrave Roundabout	Realignment of bollards to enhance road user behaviour
LNIP26/27-10	Local Safety Schemes	Local Road Safety Improvements	Ashington Grove	Bollard and lining enhancements to enhance road user behaviour
LNIP26/27-11	Local Safety Schemes	Local Road Safety Improvements	Citywide Collision Review for Scheme Identification	Citywide collision review for scheme identification based on 2025-26 collision data
LNIP26/27-12	Local Safety Schemes	ASE Programme Delivery	ASE - Shilton - Lenton*	Average Speed Camera programme delivery
LNIP26/27-13	Local Safety Schemes	ASE Programme Delivery	ASE - A444 Skyblue Way*	Average Speed Camera programme delivery
LNIP26/27-14	Local Safety Schemes	ASE Programme Delivery	ASE - Broad Lane*	Average Speed Camera programme delivery
LNIP26/27-15	Local Safety Schemes	School Street Projects	School Streets	Delivery phase 3 school streets interventions & phase 4 scheme identification
LNIP26/27-16	Traffic Management	Traffic Management Improvements	Red Lane	Scheme to encourage orderly parking near Waterman Rd / Swancroft Rd roundabout
LNIP26/27-17	Traffic Management	Traffic Management Improvements	Norman Place Road	Changes to kerb alignment to aid vehicles pass buses waiting at Duncroft Avenue
LNIP26/27-18	Traffic Management	Traffic Management Improvements	Moving Traffic Enforcement Programme	Camera based enforcement of prohibited movements
LNIP26/27-19	Traffic Management	Traffic Regulation Orders	Traffic Regulation Order Programme (V15-16-17)	Progression of TROs including residents parking schemes/speed limit changes
LNIP26/27-20	Traffic Management	Traffic Management Improvements	Adhoc Signing and Markings Refresh	Interventions to improve driver behaviour in line with intended highway functions
LNIP26/27-21	Traffic Management	Traffic Management Improvements	Community Led Interventions	Minor interventions driven by community feedback
LNIP26/27-22	Traffic Management	Traffic Management Improvements	Disable Bays and Access Protection Markings - citywide	Provision of point interventions to aid access
LNIP26/27-23	Traffic Management	Traffic Management Improvements	Permanent Vehicle Activated Signs - citywide	Influencing speed behaviour on city roads
LNIP26/27-24	Traffic Management	Traffic Management Improvements	Mobile Vehicle Activated Signs - citywide	Exploratory interventions to inform further interventions to improve safety
LNIP26/27-25	Traffic Management	Traffic Management Improvements	Keresley Road south at Kelmscote Road	Introduction of new no U-Turn restriction to aid traffic management

LNIP26/27-26	Traffic Management	Traffic Management Improvements	Watery Lane	Delivery of through traffic access restriction
LNIP26/27-27	Traffic Management	Traffic Management Improvements	Rural Speed Limit Realignment	Rationalising speed limits across the semi-urban and rural sections of the network
LNIP26/27-28	Traffic Management	Traffic Management Improvements	Traffic Surveys	Intelligence to inform and prioritise improvements
LNIP26/27-29	Traffic Management	Traffic Management Improvements	Grafton Street Traffic Management	Traffic circulation and parking study
LNIP26/27-30	Traffic Management	Traffic Management Improvements	Brookvale Avenue Roundabout - One Way System	Option appraisal of possible one-way restriction
LNIP26/27-31	Traffic Management	Traffic Management Improvements	Residents Parking Scheme Policy Review	Investigative study to review resident parking policy and impact on city parking
LNIP26/27-32	Traffic Management	Junction Improvements	St Martins Road at Stivichall Roundabout	Discourage unsafe vehicular movements through median improvements
LNIP26/27-33	Traffic Management	Traffic Management Improvements	Torrington Avenue	Road marking improvements
LNIP26/27-34	Traffic Management	Traffic Management Improvements	Pavement Parking Study - citywide	Studying the impact of pavement parking on safety of vulnerable road users
LNIP26/27-35	Vulnerable Road Users	Crossing Improvements	Brays Lane	Investigation and provision of new pedestrian crossing
LNIP26/27-36	Vulnerable Road Users	Crossing Improvements	Alderminster Road crossing at the shops opp Aynho Close	Investigation and provision of new pedestrian crossing
LNIP26/27-37	Vulnerable Road Users	Crossing Improvements	Keresley Road south of The Scotchill	Investigation and provision of new pedestrian crossing
LNIP26/27-38	Vulnerable Road Users	Crossing Improvements	Lythall's Lane at Gateside	Investigation and provision of new pedestrian crossing
LNIP26/27-39	Vulnerable Road Users	Crossing Improvements	Earlsdon Crossings and School near Subway	Investigation and provision of new pedestrian crossing
LNIP26/27-40	Vulnerable Road Users	School Related Improvement	Speed limit implementation at School Zones	Review findings of Speed Limit Policy 2025-26, and phased implementation
LNIP26/27-41	Vulnerable Road Users	School Related Improvement	School Keep Clear Programme Expansion	Camera based enforcement of SKC areas
LNIP26/27-42	UTMC	Way Finding Improvements	Portable Variable Message Sign Upgrade Programme	Replacement of end of life sign to aid traffic management during planned events
LNIP26/27-43	UTMC	Crossing Improvements	Swanswell Street / Cox Street Signal Upgrade	Full traffic signal site upgrade with provision of pedestrian facilities
LNIP26/27-44	UTMC	Crossing Improvements	Tile Hill Lane at Station Avenue	Full traffic signal site upgrade with provision of pedestrian facilities
LNIP26/27-45	UTMC	Intellegent Transport Systems	Access Control System Upgrades	Upgrade of automatic bollards to aid operation and vehicle detection
LNIP26/27-46	UTMC	Intellegent Transport Systems	CCTV Upgrade	Upgrade of end-of-life cameras and enhancements to UTMC monitoring capability
LNIP26/27-47	UTMC	Intellegent Transport Systems	Fibre Upgrade Programme	Close out of Sky Blue Network project to aid comms resilience
LNIP26/27-48	UTMC	Signal Upgrades	Traffic Signal Control Upgrades	Upgrade obsolete halogen signalling and controllers to low voltage LED signalling
LNIP26/27-49	UTMC	Signal Upgrades	Detection Upgrades	Upgrade of obsolete & defective detection enhancing network efficiency/ reliability
LNIP26/27-50	UTMC	Signal Upgrades	Mile Lane	Shuttle signal site upgrade from halogen to LED
LNIP26/27-51	UTMC	Signal Upgrades	Tile Hill Lane at Banner Lane	Full traffic signal site upgrade

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 or alignment with emerging priorities and opportunities.

* progression subject to route assessment and support from West Midlands Police

** to be considered alongside LNIP26/27-13

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 schemes are not provided in this report, due to volume of extra preparation work.

As shown in the report there is also extra funding provided by Citizen Housing Group for pavements and highway network improvements, this funding can only be used on areas of adopted highway on land owned by the group.

Pavement Treatments

Pavement Reconstruction: A scheme of work which 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 cold-applied micro-surfacing containing bitumen is spread across the existing tarmac. . This process is used on sites where early signs of deterioration are evident and hence is an excellent preventative maintenance treatment.

Road Treatments

Structural Treatments: These are treatments that structurally renew the subsurface layers of a road at varying depths. These include traditional resurfacing, isolated areas of planned patching (where only a small extent of the road is in poor condition) and recycling treatments (milling and re-laying previous materials).

Surface Treatments: Preventative maintenance treatments designed to extend the life of a road surface by sealing it from water ingress. These treatments are typically less than ¼ of the cost of structural treatments and can extend the life of roads by 10 years. We use a mixture of surface dressing, micro asphalt and asphalt rejuvenators.

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.

Coome Pool, Coombe County Park

Coombe Pool is owned by the Council and is large enough to be classified under the Reservoirs Act 1975. The pool is inspected annually to manage down flood risk and the Environment Agency as regulator for Reservoirs has supported the need for works to be carried out to the earthwork dam wall and ancillary structures. The planned scheme is to carry works routine maintenance and improvements in the interests of safety following a national reclassification of reservoir risk. Funding will be from Core Capital and delivered through the Flood Risk and Drainage Capital Programme.

Verges

This programme allows for the protection of verges, using a variety of methods including but not limited to grass grids, raised height kerbs and occasionally bollards.

Vehicle Safety Fences

This allocation is used to maintain and survey existing safety fences (Vehicle Restraint Systems) on the network and can include bridge parapets.

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 assessments, strengthening, waterproofing, repair of structural elements, and replacement of movement joints.

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Structural Road Schemes

ROAD NAME	WARD
WOODHOUSE CLOSE	BIN
YARNINGALE ROAD	BIN
HERMIT'S CROFT	CHE
OAKS PLACE	LON
FOSTER ROAD	RAD
HOLLOW CRESCENT	RAD
VILLA ROAD	RAD
SUNNYSIDE CLOSE	SHE
MARLSTON WALK	WHO
LONDON ROAD	CHE
WOODSTOCK ROAD	CHE
BEECHWOOD AVENUE	EAR
BROAD LANE	EAR
LEAMINGTON ROAD	EAR/CHE
CROSS ROAD	FOL
DEEDMORE ROAD	HEN
HOLYHEAD ROAD	SHE
PALMER LANE	STM
PRIMROSE HILL STREET	STM
TERRY ROAD	STM/LWS
CLOVELLY ROAD	UPS
HOWES LANE	WAI
BRISTOL ROAD	WHO
ALLESLEY OLD ROAD	WHO
BANNER LANE	WOO/WES
WYKEN CROFT	WYK/UPS/HEN
OUNDON WEDGE DRIVE	BAB
WALL HILL ROAD	BAB
ROBIN HOOD ROAD	BIN
THE CHESILS	EAR
EARLSDON STREET	EAR
WIGSTON ROAD	HEN
CUBBINGTON ROAD	LON
EATON ROAD	STM
WYKELEY ROAD	UPS
VALLEY ROAD	UPS
THACKERAY ROAD	UPS
HEATH CRESCENT	UPS
BRENTWOOD AVENUE	WAI
PRIOR DERAM WALK	WES
CROMWELL LANE	WES
WINSFORD AVENUE	WHO

Road Surface Treatment Schemes

ROAD NAME	WARD
BROWNSHILL GREEN ROAD	BAB
OUNDON GREEN	BAB
BABBACOMBE ROAD	EAR
STONEY STANTON ROAD	FOL
MASSER ROAD	HOL
PARROTTS GROVE	LON
TALLANTS CLOSE	LON
MELLOWDEW ROAD	LWS
LEICESTER ROW	RAD
ST NICHOLAS STREET	RAD
FOSTER ROAD	RAD

GLOUCESTER STREET	SHE
CEDARS AVENUE	SHE
QUINTON ROAD	STM
GULSON ROAD	STM
CLOVELLY ROAD	UPS
HONITON ROAD	UPS
ST MARTINS ROAD	WAI
MOAT AVENUE	WAI
GREEN LANE	WAI
WESTWOOD WAY	WES
CROMWELL LANE	WES
GREENDALE ROAD	WHO
BILLING ROAD	WHO
ALANDALE AVENUE	WOO
HAWTHORN LANE	WOO
ESKDALE WALK	BIN
ABBAY ROAD	CHE
BENTHALL ROAD	FOL
BROAD STREET JETTY	FOL
UPPER HILL STREET	STM
IVOR ROAD	FOL
BOYD CLOSE	HEN
JONATHAN ROAD	HEN
MARDOL CLOSE	HEN
LEACREST ROAD	HOL
NEWMARKET CLOSE	LON
TYNEMOUTH CLOSE	LON
CENTRAL AVENUE	LWS
EAST AVENUE	LWS
ACACIA AVENUE	STM
IRVING ROAD	STM
EDALE WAY	UPS
SIDMOUTH CLOSE	UPS
BYWATER CLOSE	WAI
HEXWORTHY AVENUE	WAI
BAXTER CLOSE	WES
DUKE STREET	WHO
DIAL HOUSE LANE	WOO
UNICORN LANE	WOO
WOODCRAFT CLOSE	WOO
TYBALT CLOSE	BIN

Footway Improvement Schemes

ROAD NAME	WARD
ROSAVILLE CRESCENT	BAB
GEORGE MARSTON ROAD	BIN
STONEY ROAD	CHE
ODDICOMBE CROFT	EAR
FOLESHILL ROAD	FOL
FAIRBANKS CLOSE	HEN
LUCIAN CLOSE	HEN
YELVERTON ROAD	HOL
BARSTON CLOSE	LON
GRANGEMOUTH ROAD	RAD
CLIPSTONE ROAD	SHE
RINGWAY QUEENS	STM
ALPINE RISE	WAI
CURRIERS CLOSE	WES
FALKLAND CLOSE	WES

WELLESBOURNE ROAD	WOO
WHITNASH GROVE	WYK
PARKHILL DRIVE	WOO
EASTERN GREEN ROAD	WOO
RADFORD ROAD	RAD
BROAD LANE	EAR/WOO/WES
BERRY STREET	STM
KING WILLIAM STREET	STM
HOLBROOK LANE	RAD/FOL
WALSGRAVE ROAD	STM/LWS/UPS
BARRAS LANE	SHE
WIDDRINGTON ROAD	RAD
WILLENHALL LANE	BIN
BOUNDON ROAD	SHE
BENNETTS ROAD SOUTH	BAB

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Public report Cabinet

Cabinet

17 March 2026

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J' O'Boyle

Director approving submission of the report:

Director for Regeneration and Economy

Ward(s) affected:

All

Title: Coventry Climate Adaptation & Resilience Plan (2026 – 2030)

Is this a key decision?

Yes

Executive summary:

The impact of more extreme weather is being experienced both in the UK and globally, with the last year recorded as the hottest on record, and more frequent incidents of flooding and stronger storms. In Coventry we can expect to face further significant changes in the weather over the coming years with an increasing incidence of extreme weather events. The Met Office projections show that the region will face warmer wetter winters and hotter drier summers with declining levels of annual rainfall leading to lower levels of water availability. This has the potential to impact on our residents, businesses, services, infrastructure and natural environment. Some of the key risks the report highlights relate to food security, flooding of key infrastructure, homes and businesses and impacts of reduced water supplies, alongside public health risks due to high temperatures and poor air quality.

The Council have worked with consultants and partner organisations to develop an Adaptation and Resilience Plan for Coventry to better understand key risks and vulnerabilities. An action plan has been developed in response to this, and whilst the Council has a key role to play in its implementation, a citywide partnership approach has been taken, which include actions for partner organisations. Not all climate risks can be mitigated; in some areas we need to adapt to changes already happening to increase preparedness and impact. This report sets out the findings of this Plan, which is proposed to be adopted to support future policy development, and business, service and resilience planning and delivery.

Recommendations:

Cabinet is recommended to:

1. Approve the adoption of the Coventry Climate Adaptation and Resilience Plan set out in Appendix 1 of this report, to ensure that this is a key consideration as part of Council policy development, service delivery and business continuity planning.
2. Endorse that the Council continues to work in collaboration with partners (through the city's Climate Change Board), wider stakeholders, businesses and communities to support delivery of the Climate Adaptation and Resilience Action Plan. This includes seeking solutions and the necessary resources to address the identified risks from the increasing incidence from extreme weather events for the health and wellbeing of the population, the environment and the local economy.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1 – Coventry's Adaptation and Resilience Plan Executive Summary

Appendix 2 – Equalities Impact Assessment

Background papers:

None

Other useful documents:

UK Climate Risk Independent Assessment (CCRA3-1A) Technical Report
Introduction June 2021

[Technical report \(CCRA3-1A\) - UK Climate Risk](#)

A Summary of Climate Change Impacts in the West Midlands Combined Authority
Area Nov 2022

[A Summary of Climate Change Impacts in the West Midlands Combined Authority
Area](#)

WMCA Climate Risk and Vulnerability Assessments (CRVAs) Nov 2022

[Microsoft Power BI](#)

Mapping Climate Risk and Vulnerability in the West Midlands Nov 2024

[WM-CRVA methodology_guidancedoc_v1.0.pdf](#)

Coventry Climate Change Adaptation Report Round 4 (ARP4) Dec 2024

<https://www.gov.uk/government/publications/climate-adaption-reporting-fourth-round-local-authority>

Climate Change Adaptation Report Round 4 (ARP4) Dec 2024
[Climate Change Adaptation Report Round 4 – Coventry City Council](#)

Local Authority Climate Service Portal 2024
[Local Authority | The Met Office climate data portal](#)

Just in Case: narrowing the UK civil food resilience gap February 2025
[The report - Food Security](#)

Climate Change Committee Progress in Adapting to Climate Change April 2025
[Progress in adapting to climate change – 2025 report to Parliament](#)

Duties and Powers for Local Authorities in the UK to Adapt to Climate Change CAG Consultants Report to the Climate Change Committee Nov 2025
<file:///C:/Users/CVBRE408/OneDrive%20-%20Coventry%20City%20Council/Adaptation%20to%20Climate%20Change/National%20Policy%20Documents/Duties-and-Powers-of-Local-Authorities-for-Climate-Change-Adaptation.pdf>

Climate adaptation strategy for Transport Dec 2025
[Climate adaptation strategy for transport - GOV.UK](#)

The World Economic Forum Global Risks Report 2026 January 2026
https://reports.weforum.org/docs/WEF_Global_Risks_Report_2026.pdf

Cabinet Report December 2024: [Agenda item - Climate Change Strategy 2024 - 2030 - Coventry City Council](#)
[Climate Change Strategy – Coventry City Council](#) and [Climate Change Action Plan – Coventry City Council](#)

Has it or will it be considered by Scrutiny?

No

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

No

Will this report go to Council?

No

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Report Title: Coventry Climate Adaptation and Resilience Plan

1.0 Background & Context

- 1.1 The World Economic Forum Global Risks Report 2026 identifies extreme weather events to be the greatest long term (10 years) risk to the Global Economy and the 4th most significant in the short term (2 years). The UK Climate Change Committee's latest report to Government concerning adaptation and resilience has been very critical of the lack of progress and is stressing the need for more action on the ground. One of the five pathways in Coventry's Climate Change Strategy is to address adaptation and resilience to the increasing incidence of extreme weather events and one of the principal actions was to develop an action plan to address the key risks to the City. This Plan is the result of the work carried out by over 15 organisations which all have a key role to play in addressing the very adaptation and resilience issues which impact upon the City
- 1.2 The recommended approach was to adopt the latter for the following reasons:
- a) The Climate Change Strategy recommendation which was developed in association with the independent Climate Change Board was for the development and implementation of a strategy and action plan. This is intended to address the risks presented to Coventry from the increasing incidence of extreme weather events and improve preparedness.
 - b) The complex nature of the causes and effects of extreme weather events and how they impact upon the city and the role various organisations and agencies have to play in addressing such risks requires a strongly collaborative partnership approach;
 - c) It provides a single strong message to potential funding bodies showing a well thought through, thoroughly researched collaborative effort with commitments to shared actions;
 - d) The Plan identifies opportunities for the more efficient pooling of resources and expertise (much of which does not exist within the Council) and the commitment to action, the measurement of performance and outcomes as well as collective accountability to the population we serve through the Council with a level of independent oversight
- 1.3 Over fifteen Coventry-based organisations involved in the Climate Change Board's Adaptation & Resilience Pathway Group (chaired by the Environment Agency) carried out a detailed risk assessment for those risks which may be applicable for the City as a whole. This was undertaken using the Government's third national climate risk assessment set of indicators (<https://www.ukclimaterisk.org/wp-content/uploads/2021/06/Technical-Report-The-Third-Climate-Change-Risk-Assessment.pdf>).

- 1.4 The team looked at the Government's Technical Report covering 61 climate change risk factors (CCRA3) and considered those most applicable to Coventry. The Team assessed the level of vulnerability for each issue that the City was exposed to (whether it was the area, number of people or number of businesses likely to be affected) the level of sensitivity to the issue i.e. how it could affect the population including some groups in the population who may have conditions worsened by a factor (e.g. prevalence of respiratory illnesses etc) these and the level of adaptation and resilience we have already in place in relation to the nature of the risk and our ability to adapt to the risk to reduce its impact upon the City and its people. Each risk factor could have a vulnerability score from 0 to 6 with the higher the score reflecting the more vulnerable a location would be.

Vulnerability Score = Exposure + Sensitivity – Adaptive Capacity

- 1.5 In addition to identifying risks across the city as a whole, the team worked with the Met Office and the Universities in mapping out risks geospatially down to the neighbourhood level (local super output areas) where possible. The level of detail in relation to the varying environmental parameters such as risk of flooding, groundwater level etc is variable and working with the Met Office, DEFRA, the WMCA and Universities a more detailed picture to inform very local interventions will develop over time. A [Climate Risk and Vulnerability Assessment Tool](#) (CRVA) for the region is now available, the database is under constant development.
- 1.6 The following key risks are identified and a level of priority assigned according to the level of vulnerability and importance. The darker coloured sections are High Priority and the lighter coloured are a Medium Priority:

Ref	Identified Risk	Score
H9	Risks to food safety and food security	5
I1	Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures	4
I2	Risks to infrastructure services from river, surface water and groundwater flooding	4
I8	Risks to public water supplies from reduced water availability	4
H1	Risks to health and wellbeing from high temperatures	3
H3	Risks to people, communities and buildings from flooding	3
H7	Risks to health and wellbeing from changes in air quality	3
H10	Risks to water quality and household water supplies	3
H12	Risks to the delivery of health and social care	3
H13	Risks to education and prison services	3
B1	Risks to businesses from flooding	3
B5	Risks to business from reduced employee productivity due to infrastructure disruption and higher temperatures in working environments	2
H5	Risks to building fabric	2
H6	Risks and opportunities from summer and winter household energy demand	2

H8	Risks to health from vector-borne disease	2
I4	Risks to bridges and pipelines from flooding and erosion	2
I5	Risks to transport networks from slope and embankment failure	2
I10	Risks to energy from high and low temperatures, high winds, lightning	2
I12	Risks to transport from high and low temperatures, high winds, lightning	2
I13	Risks to digital from high and low temperatures, high winds, lightning	2
N4	Risk to soils from changing climatic conditions, including seasonal aridity and wetness.	2
N11	Risks to freshwater species and habitats from changing climatic conditions and extreme events...	2
N12	Risks to freshwater species and habitats from pests, pathogens and invasive species	2
N18	Risks from climate change to landscape character	2

- 1.7 A series of over 120 specific actions have been identified by the Climate Change Board's Adaptation & Resilience Pathway Group and these are detailed in the Adaptation and Resilience Plan along with key milestones, lead personnel, resources, partner organisations (including the Strategic Energy Partnership) and target dates for delivery etc.
- 1.8 The greatest identified risk relates to food security for the population, with prices subject to volatility from global markets that are increasingly impacted by climate change and conflict. This could hit hardest for those experiencing food poverty and put more demand on food banks. To help mitigate this risk we need to develop local infrastructure and networks to support communities to have access to local fresh produce and a greater level of independence from the insecurity of global food markets and the prospect of increasing food prices.. The Council is working with partners to develop a series of initiatives to open up more land for food growing and support communities and resident with training, along with community cooking activities to help develop food growing and culinary skills for healthy eating in the city.
- 1.9 The impacts of extreme weather events on infrastructure (e.g. electricity grid including substations, gas supply, water mains, fibres and cable, telecoms etc) poses a significant risk and the extent of progress in identifying and addressing those risks requires considerably more work across all of the major infrastructure providers. This will require detailed audits and action plans down to the level of facilities on the ground. There are opportunities for collective effort and some useful lessons to be learned from national pilots elsewhere in the country to be used in Coventry. A case will be made by the Sustainability Team and partners to providers with a cost benefit analysis for the relevant bodies for securing investment and funding. These assets will need to use the latest technologies physical barriers and safeguards to protect this vital service infrastructure.

- 1.10 The changes in climate have significant effects upon wildlife and biodiversity in the city. There will need to be changes in the way habitats and land are managed, with a focus on conservation management and creation of nature corridors to support nature recovery. Working in partnership with local communities, more areas of green space will be created from current areas of neglected or vacant land along with tree planting in urban areas. All of these measures will also help with water conservation, reducing the risk of flooding e.g. rain gardens and swales and cooling down neighbourhoods especially during periods of extreme heat.
- 1.11 Some examples of the 100 plus specific actions to illustrate the range of activities the Plan covers include:
- Local Plan Policies to drive future developments so that measures are taken to conserve water and minimise impact of extreme weather events such as energy efficient cooling and heating using latest green technologies.
 - Development of Landed Kitchens and community food growing areas and activities to support food distribution in times of crisis with Food Network
 - Raising public awareness and supporting development of neighbourhood resilience groups in areas at risk from extreme weather events with projects at neighbourhood level
 - Engaging providers in auditing risks to infrastructure and interventions to address them particularly in relation to heat and flood
 - Providing support and guidance to businesses in developing risk assessments and plans for business premises and workforce to minimise impacts upon the local economy.
 - Research and enforcement activity relating to housing conditions and promotion of retrofit grants to private landlords to reduce risks relating to heat, damp, condensation and mould and use of battery storage to assist those at risk of fuel poverty.
 - Development of sustainable urban drainage schemes, rain gardens and areas of green space across the city particularly in the deprived neighbourhoods where access is poor to help reduce risk of flooding, assisting water conservation and cooling for areas in the city.
- 1.12 In addition to the Risk Assessment, Strategy and Action Plan, Coventry was invited by DEFRA to contribute to the Government's development of the Fourth National Adaptation Plan. DEFRA initiated the further Adaptation and Resilience Reporting process ARP4 which previously involved the major utility and infrastructure service providers such as the water companies, National Grid, Port Authorities, utilities etc (as part of the Climate Change Act 2008) which is now extended to some Pilot local authorities

<https://www.gov.uk/government/publications/climate-adaption-reporting-fourth-round-local-authority>

- 1.13 Coventry also supported the WMCA and the University of Birmingham in the development of the West Midlands Climate Risk and Vulnerability Assessment tool for the region which includes vulnerability assessment data down to Local Super Output Area (LSOA)
<https://app.powerbi.com/view?r=eyJrIjojODQ3MmNmYigtMTAwMS00OTU5LTk4MzktNDE0ZDA4Y2E2MzE3IiwidCI6IjA4NTIiYjQ1LWYxYWU0NGUwYS05ZWZhLWU2ZDY2YmJiNjcyZiJ9>
- 1.14 Coventry's climate adaptation and resilience planning process was independently assessed as a Level 3 performing organisation which is identified as 'Efficient Management' and set a target to rise to Level 4 in the next year, which is at the level of delivering 'Breakthrough Projects'.

2.0 Options considered and recommended proposal

2.1 The following options have been considered by the City Council:

a) Do nothing and continue with existing areas of activity some of which relate to statutory obligations e.g. addressing some flood risks and any matters which arise on an ad hoc basis; Doing nothing would expose the City to all of the real risks identified by the Risk Assessment which would have adverse impacts upon public health, the delivery of essential services, business activity, tourism and the economy. **This option is not recommended.** Or

b) Develop a City Council Action Plan which relates to all the services and activities managed by the City Council;

A Plan developed by the City Council alone would not be able to address the complex adaptation and resilience issues that climate change presents. There is a strong need for a collaborative ongoing effort sharing evidence, pooling expertise and resources co designing approaches and where relevant working in partnership on the Ground to address issues in an environment experiencing some dramatic changes. **This option is not recommended,** or

c) Develop a partnership approach involving a number of key stakeholders in addition to the City Council whose activities and services can impact upon the City as a whole.

The effects of extreme weather events affects everyone both individual and organisations and can have serious consequences for a very large number of public, private and voluntary providers of goods and services across the City.

The complex nature of these issues and the need for pooling resources and expertise in order to address them suits the development of City Strategy and

Plan which facilitates collaboration and collective action when necessary. **This is the recommended approach.**

2.2 The recommended approach was to adopt the latter for the following reasons:

- a) The Climate Change Strategy recommendation which was developed in association with the independent Climate Change Board was for the development and implementation of a strategy and action plan. This is intended to address the risks presented to Coventry from the increasing incidence of extreme weather events and improve preparedness;
- b) The complex nature of the causes and effects of extreme weather events and how they impact upon the city and the role various organisations and agencies have to play in addressing such risks, requires a strongly collaborative partnership approach;
- c) It provides a single strong message to potential funding bodies showing a well thought through, thoroughly researched collaborative effort with commitments to shared actions;
- d) The Plan identifies opportunities for the more efficient pooling of resources and expertise (much of which does not exist within the Council) and the commitment to action, the measurement of performance and outcomes as well as collective accountability to the population we serve through the Council with a level of independent oversight.

3.0 Results of consultation undertaken

- 3.1 The public consultation regarding Climate Adaptation and Resilience was carried out as part of the process in developing the Climate Change Strategy. It was established to be the least understood of the five pathways for delivering on sustainability. The Climate Adaptation and Resilience Plan provides a detailed assessment of the risks associated with extreme weather events and their potential impact upon the community and the economy. Through continued engagement, this information will help increase understanding of vulnerability and actions that can be taken to reduce impacts amongst residents and businesses.
- 3.2 A series of focus groups have been held in the key at risk neighbourhoods in Hillfields, Foleshill, Longford and Radford with a view to supporting the establishment of local resilience groups at the neighbourhood level. That has been done in conjunction with WMCA and local universities. A pilot neighbourhood will be selected to move towards this goal.
- 3.3 The Council commissioned CAG Consultants, Slingshot Solutions and Sustainability West Midlands to work as a team in supporting the 'Independent Climate Change Board's' 'Adaptation & Resilience Pathway Group' chaired by the Environment Agency. The task of the Consultancy Team was to work with the Pathway Group obtaining the necessary data and information for

undertaking a comprehensive risk assessment with information available. This informed the identification of the key vulnerabilities to the population, the local economy, environment & infrastructure as well as the delivery of essential services.

- 3.4 A focused event was organised followed by workshops and meetings to engage senior representatives from those organisations with interests in adaptation and resilience. Representatives who had access to resources and expertise to support the development of a Strategy and Implementation Plan for the City contributed in identifying priorities and opportunities for collaboration, including looking at how each of their organisations can contribute to enhancing the City's adaptation and resilience in addressing the identified risks from extreme weather events. The Risk Assessment, Strategy and Plan are the products of that process.

4.0 Timetable for implementing this decision

- 4.1 The Adaptation and Resilience Plan will be implemented with immediate effect. It details over one hundred identified actions, with suggested milestones etc, lead personnel, partner organisations and where known resources.
- 4.2 A number of the actions are also aspirational and resources will need to be found to make them a reality. Already some bids have or are to be submitted for funding from the EU, regional and national government and other external sources for specific actions within the Plan.
- 4.3 Progress on the delivery of the Adaptation and Resilience Plan will be reviewed by the Council and its partners on an annual basis and will be subject to major review in 2030.

5.0 Comments from Director of Finance and Resources and Director of Law and Governance

5.1 Financial Implications

A number of actions within this Plan are to be funded through existing routes for funding for projects on the ground arising through the land use planning processes e.g. Section 106 or Biodiversity Net Gain or allocations from central government e.g. flood management. Several actions within this Plan are also aspirational and bids for funding in partnership with others will also be sought from other sources e.g. National Lottery. Forthcoming funding changes expected from central government and the role of local authorities in addressing Adaptation and Resilience is being assessed by the Government's Climate Change Committee and changes in the Environment Agency and the new proposed regulatory/enforcement body to replace OFWAT with its new functions may also create opportunities for funding through allowing more investment from the Water Companies for water conservation measures.

One of the most pressing needs for supporting the delivery of the Plan will be to secure funding is for a specialist post for co-ordinating the activities of the

multi-agency Partnership in implementing the Plan. This will be a matter to be initially broached with a number of key stakeholders with interests in adaptation and resilience across the City to establish whether the cost of the post could be shared across the Partnership.

5.2 Legal Implications

- 5.2.1 The Climate Change Act 2008 establishes a framework for tackling climate change. It sets legally binding targets for reducing greenhouse gas emissions, including a net-zero target by 2050. The Act also includes provisions for carbon budgeting, risk assessments, and adaptation programs.
- 5.2.2 The Climate Change Act 2008 also outlines responsibilities for local authorities, primarily focusing on reducing greenhouse gas emissions and adapting to climate change. While not mandated to achieve specific targets, local authorities have powers and influence in areas like transport, energy, waste management, and planning, which contribute to national carbon reduction goals. They are also expected to address climate change risks and impacts within their area.
- 5.2.3 The recommendations proposed in this report are consistent with the Council's duties set out in 5.2.1 – 5.2.2 above.
- 5.2.4 Whilst the legislative tools vary, the urgency is consistent and broad discretionary powers such as the General Power of Competence enables councils to go beyond minimums to protect their communities with some specific duties for flood risk and emergency planning and a de facto duty created by national planning policy. (See CAG's report for the Government's Climate Change Committee 'Duties and Powers for Local Authorities in the UK to Adapt to Climate Change') <https://www.ukclimaterisk.org/wp-content/uploads/2025/07/Duties-and-Powers-of-Local-Authorities-for-Climate-Change-Adaptation.pdf>)
- 5.2.5 The UK Climate Change Committee recommends that local authorities embed climate adaptation and resilience into all core services, spatial planning and risk management strategies.

6.0 Other Implications

6.1 How will this contribute to the One Coventry Plan?

In addition to meeting one of the three priorities in addressing the causes and consequences of climate change this plan also recognises the need for a just transition and that the most vulnerable members of society are those most at risk from the effects of extreme weather events as a consequence of climate change. In addition the impact of such events on local businesses can be significant and need to be addressed in order to safeguard jobs and protect the local economy. The Adaptation & Resilience Strategy and Plan therefore contributes to all of the One Coventry Plan's key priority areas.

6.2 How are risks being managed?

A very detailed risk assessment has been developed as part of the Plan, and the Strategy and Implementation Plan details how they will be managed. Working as a collaborative partnership will also help to increase the City Council's chances in securing and pooling resources where necessary to increase the prospects for successful delivery and mitigate risks.

6.3 What are the impacts upon the organisation?

Faced with an increasing risk of extreme weather events in the years to come this work could help to reduce the negative impacts upon the City's assets and infrastructure and also to help protect the health and wellbeing of the workforce and the population it serves. The successful delivery of actions in the Plan should assist the continuity in the delivery of public services as well as reducing disruption to businesses, damages and losses.

6.4 Equalities / EIA?

The attached Equality Impact Assessment (Appendix 2) demonstrates that the Adaptation and Resilience Plan will have no negative impacts on people and in many cases will seek to address inequality and mitigate the impacts of climate change on communities most vulnerable to future climate impacts.

The Strategy and Action Plan is primarily focused on engaging and supporting those who are most vulnerable in society and providing the necessary support to mitigate the effects of such incidents on local residents and businesses and to enhance resilience in those vulnerable locations wherever possible.

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

The need to address adaptation and resilience is one of the five key pathways identified in the Climate Change Strategy and the production of the Risk Assessment, Strategy and Plan is one of the key actions identified in the Climate Change Strategy. The increasing incidence of extreme weather events is presenting a growing risk to the City its infrastructure, the environment and of particular concern the risks to the population in terms of health and wellbeing and also costs to businesses and the economy and economic stability.

6.6 Implications for partner organisations?

The Climate Change Board's Adaptation and Resilience Pathway Group recognises the importance of this issue not only to the City but also to the resilience of the organisations which have been involved in this work. There is an ongoing commitment to working in partnership for addressing the issues of concern and mitigating the impact of events when they occur. There is also a particular focus on safeguarding the most vulnerable members of the

population wherever possible and addressing the needs for those most at risk of extreme weather events.

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Coventry Climate Adaptation and Resilience Plan

Executive Summary, March 2026

DRAFT (to be updated with designed version)

Foreword from Cllr Jim O'Boyle, Cabinet Member for Jobs, Regeneration and Climate Change

Who would have thought that Coventry would have a tornado, yet last year we did. Fortunately, it was short-lived and did not cause too much damage, but what if they became more frequent? How can we be better prepared and more resilient to such threats? Already we're seeing more frequent extreme weather events around the world. Some with devastating consequences, loss of life, destruction of property including significant impacts to our global economy.

What is even more concerning than extreme climatic events are the gradual growing trends over time. Of particular concern are the increasing temperatures we are experiencing especially in the summer months.

More locally, this plan identifies the more extreme weather events and changing weather patterns that can impact on our communities and economy, including more than 20,000 properties at risk of flooding. Last year Coventry experienced rising temperatures with the hottest summer on record (June to August) with some significant risks to public health for those with known conditions and impacts on our city's infrastructure and water supply.

As the Cabinet member responsible for addressing issues relating to climate change, I see how important it is that we understand the future risks to the city and find ways of adapting to the changes in weather we are now experiencing. This is why 'Climate Adaptation and Resilience' is a key pathway in our city's Climate Change Strategy. We need to plan ahead and work with our communities and businesses to and become more resilient in the face of weather conditions which are becoming less predictable and more extreme. We have a duty to protect our city as best as we can and the Council recognises it requires a collaborative effort working with agencies across the city alongside, businesses and communities, particularly those most vulnerable to risks. It is also vitally important that local residents and businesses are aware of the risks and to develop plans to protect themselves, their families, homes and communities from the effects the increasing incidence that extreme weather events may have.

I am very grateful to all of our partners who are working with us and who have contributed to this shared goal of adapting to climate change and making our city more resilient to the threat that extreme weather events pose.

(Photo to be inserted)

Adapting to a changing world and being resilient to change

There is no denying that over recent years the world is experiencing an increasing incidence of extreme weather events with devastating effects on communities and the economy. We have witnessed floods from rivers and storm surges, forest fires, droughts, heatwaves, high winds, cold snaps, hurricanes and tornadoes. These pose a significant threat to our health and wellbeing, economy, and property.

The Met Office predictions for the West Midlands as with the rest of the UK are that overall we can expect to experience warmer wetter winters and hotter drier summers with a reduction in our water supply overall as our annual rainfall drops.

Farmers across the UK are already changing the way they farm the land and the crops they grow. Who would have thought that twenty years ago the UK would today be competing with France as a significant wine producer. Severe cold spells are still likely to occur but less often. The State of the UK Climate Report indicates a 16% reduction in the number of days where temperatures go below 0 °C in the last decade. This will have an effect on our fruit crops for instance which require a minimum number of frost days for flowers and later fruit to develop, also frost days significantly help to control pests on our crops. One of our biggest concerns is how the changes in our global and local climate will affect agriculture and food security in the future.

The costs of climate change

A recent assessment commissioned by the West Midlands Combined Authority (WMCA) indicates that the annual economic costs to the region of these increasingly extreme weather events could rise from £350 - £638m by 2030 and from £1.5bn - £2.9bn by 2050 (*Economic Impact Assessment of Climate Change on the Economy of the West Midlands Combined Authority Region, WMCA Aug 2024*).

<https://www.wmca.org.uk/media/zw5dfb2k/economic-impacts-assessment-executive-summary.pdf>

The WMCA estimated the cost of three historic extreme weather events, Storm Doris, dating back to Feb 2017, the heatwave in July and August 2022 and the flash flooding in August 2023. These incidents resulted in the temporary closure of road and rail connections, disruptions in power supply, damage to property, loss of business, unfortunately also injury and death, with an estimated price tag in excess of £21m. Four deaths were reported as a consequence of the storm and the number

of reports of injuries to the West Midlands Ambulance Service (WMAS) increased threefold during this period in comparison to the regional average.

Event	Date	Cost
Storm Doris	Feb 2017	£7,045,030
Heatwaves	July/Aug 2022	£11,805,340
Flash flooding	Aug 2023	£2,791,130
Total		£21,641,500

What does all this mean for Coventry?

Some people are more at risk to the effects of extreme weather events because of where they live and their exposure to adverse conditions. They may live close to a river with a greater risk of flooding. People with pre-existing health conditions may be more vulnerable to the effects of extreme weather, particularly in more heavily trafficked areas with great levels of pollution, less green space and poor air quality. Many homes won't have air conditioning. Households already living in fuel poverty are unlikely to be able to afford the installation and running costs of cooling systems. Everyone will be vulnerable to food price spikes when supply is affected. This may well result in more people entering into food poverty.

No matter what we do to reduce carbon emissions in the longer term we are going to face some significant changes to our weather in the coming years. There are two key things we have to do to protect ourselves for the future and that is to

- **Adapt to the changes, and**
- **be more resilient so we are more able to recover quickly should an event occur.**

There are two courses of action which we will have to take. One is to understand the changes we are facing accept that they are happening and to **adapt** to them. For example, when planting new street trees, we need to use species that can cope with higher temperatures and lower water levels especially in the summer months. Another example is if someone lives in an area where there is a known risk of flooding and is planning on rewiring their house to put practical measures in place such as locating the ground floor electricity cabling plugs and sockets are at a higher level above the possible flood levels, using plaster that contains a waterproofing agent and salt inhibitor and use flotation air bricks to prevent basements from flooding etc. Here we are adapting to the changes and by doing so can also become more **resilient** by preparing, planning ahead for change and know what to do, when and how to do it. In this instance such measures would make it easier for a family to move back into a house after it has been flooded., so when events happen we can minimise the damage and recover more easily.

If we establish ways to give people early warnings about the risk of extreme weather events (e.g. flooding , heat waves, high winds and storms etc) and the times in which

they have to respond they are likely to be better prepared when the time comes. Households could develop their own personal plans as a precautionary measure to best protect their family and possessions so that they are more able to adapt and be resilient when the time comes.

Some of the best examples of resilience can be found in developing countries where whole communities come up with ways to adapt to changes. Communities involved in forward planning are better prepared for an event when it occurs and rally round far more effectively as a community in times of need. Engaged communities have a vital role to play in protecting and minimising damage when faced with extreme weather events

Understanding the challenge and rising to it

Climate Adaptation and Resilience is a key pathway in the city's Climate Change Strategy. Coventry's independent Climate Change Board has established an up an 'Adaptation and Resilience Pathway Group' to develop an Adaptation and Resilience Plan for the city. The Group includes representatives from the Environment Agency, Severn Trent, University of Warwick, Coventry Solihull Warwickshire Resilience team. The Council appointed CAG consultants to lead on development of the city's Adaptation and Resilience Plan, working with the pathway group and other key stakeholders across the city. The plan identifies risks under different climate scenarios, which have been assessed and plans developed to try and address them.

Methodology for assessing the risks to Coventry

The development of the Adaptation and Resilience Plan is based on the UK's 3rd Climate Change Risk Assessment (CCRA3¹) approach, where 61 specific climate risks and opportunities were identified as applying to the UK and seeing of those which are of the most importance to address for Coventry. Of those risks the Pathway Group looked at the 34 categories of risk that related to Coventry, and of these assessed which posed a high or medium risk.

In order to assess our **vulnerability** to these risks we had to identify the nature of the hazard and where, and factors such as whether people living in some locations more vulnerable than others as a result of extreme weather scenarios. This included heavy rainfall leading to flooding, heatwaves causing excessive indoor air temperatures or adversely affecting outdoor air quality and risk of fires, damage from high winds, effects of severe cold weather and its effects upon the elderly and those in fuel poverty etc.

Using data and projections from the Environment Agency, Met Office and our own teams of specialists we identified our **exposure** to the risk e.g. the extent and likely duration of flooding and how many households and businesses are likely to be

¹ <https://www.ukclimaterisk.org/publications/technical-report-ccra3-ia/>

affected and how often over time. We assessed the level of **sensitivity** to the risks e.g. certain vulnerable groups with health conditions may be particularly at risk and will need to be protected, or specific locations may be sensitive to drought and prone to fires. We then reviewed our ability to **adapt** to the likely changes, the more we are able to adapt the less vulnerable we are likely to be. All of these things were taken into account when assessing our vulnerability to a risk with a final combined score for each risk factor being on a scale from 0 to 6 with a final score of 0 being a negligible risk to six a serious risk.

Vulnerability = Exposure + Sensitivity – Our capacity to adapt

Nothing is certain, we have lots of data from current trends and projections to help inform us what the future is likely to look like. We can look at a range of different scenarios based upon the levels of greenhouse gases we have in the atmosphere. The higher the concentration level the more extreme the weather incidents are likely to be.

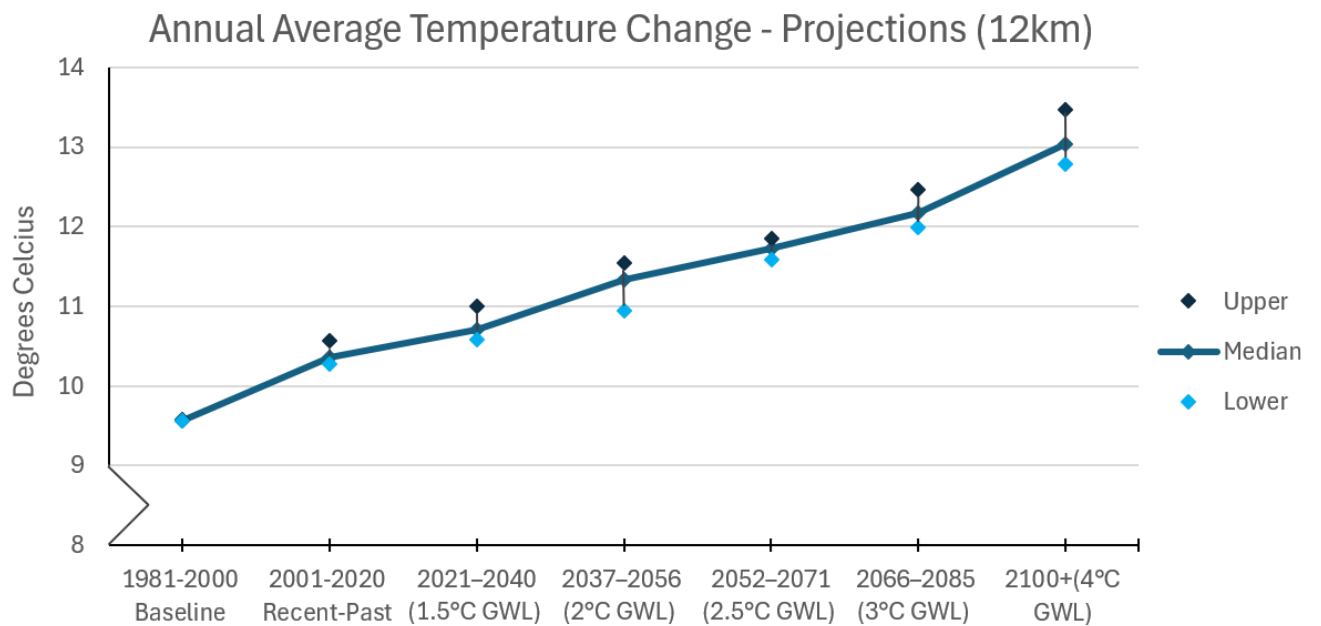
If we can reduce the levels of emissions proposed at the UN Climate Change Conference in Paris in 2015 the world would be able to keep the average global temperature increase to 1.5°C by the end of the century. If we are not able to do so then we are likely to experience even more extreme weather. The French Government, for example, is planning all of its future activities and services for a world with a 4 °C temperature rise by the end of the century. It is worth noting that Coventry, being in the heart of the UK, is likely to experience higher overall average temperature increases than the rest of the country. One can safely assume that it is likely to be more of a challenge to those delivering services to the citizens of Coventry than in other parts of the country.

The study looked at a number of temperature rise scenarios using a combination of 12 different Met Office models and the likely weather changes by 2050 and the end of the century (2100 AD) some of those key measures are detailed below illustrating the range of potential outcomes in relation to the Global Warming Levels (GWL's).

Climate scenarios for Coventry

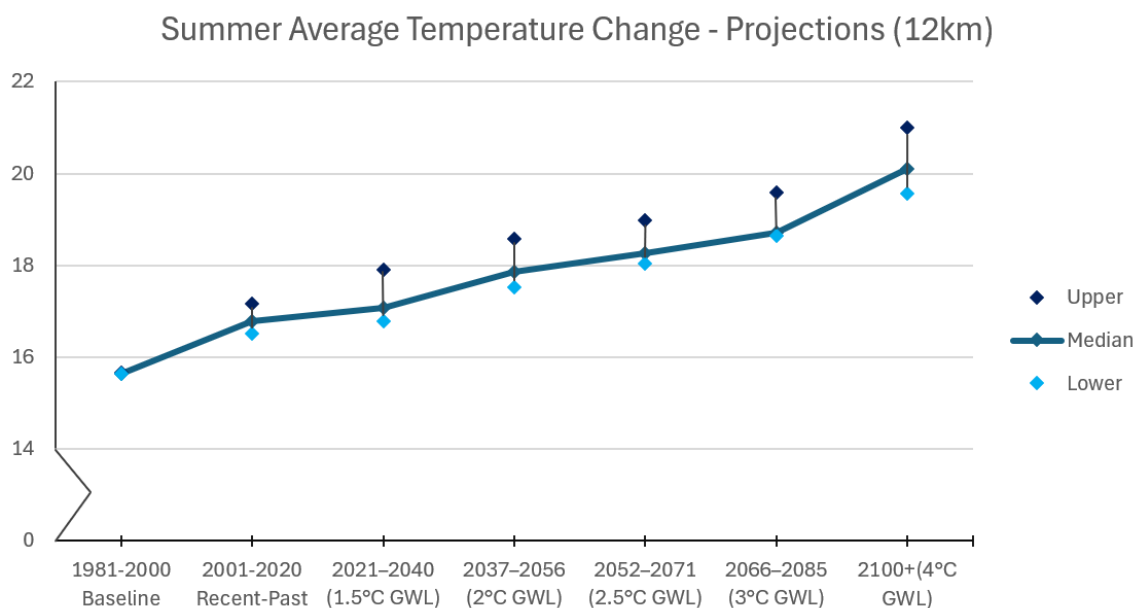
The following graphs illustrate the results from the analysis of the 12 Met Office models and the projected changes in temperature and rainfall scenarios from the present to the end of the century:

Overall temperature rises

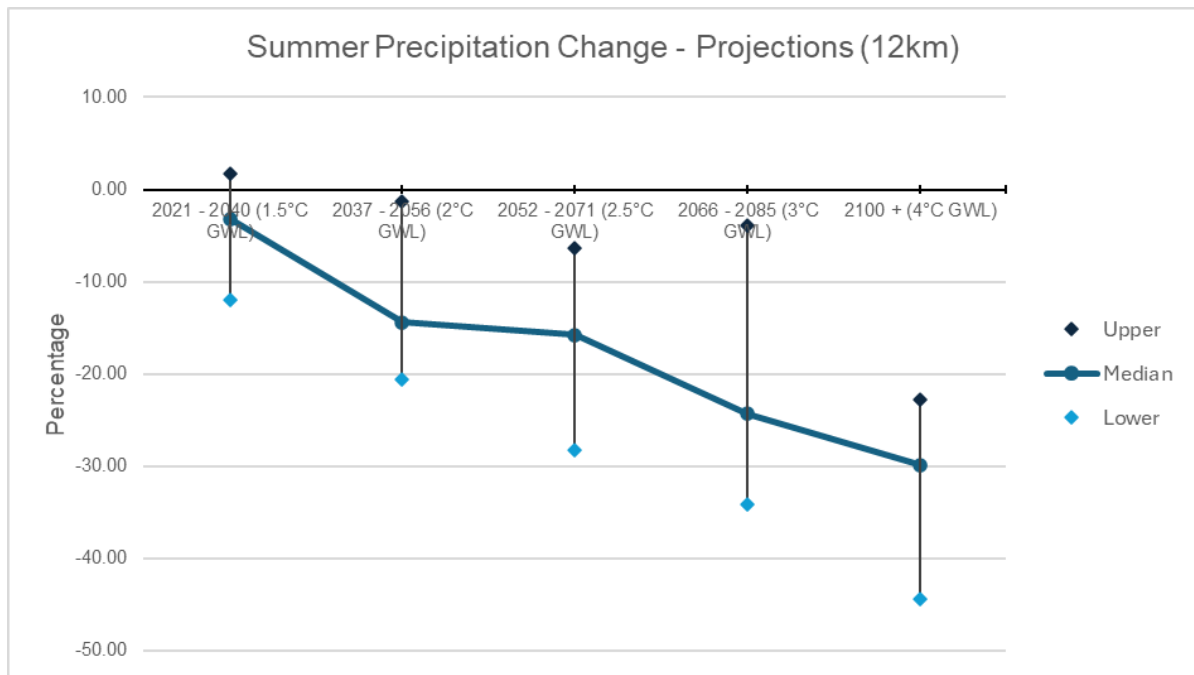


A significant rise in rainfall in Coventry over the course of the 21st century approaching at least a 3°C rise based upon current projections.

Hotter Drier Summers

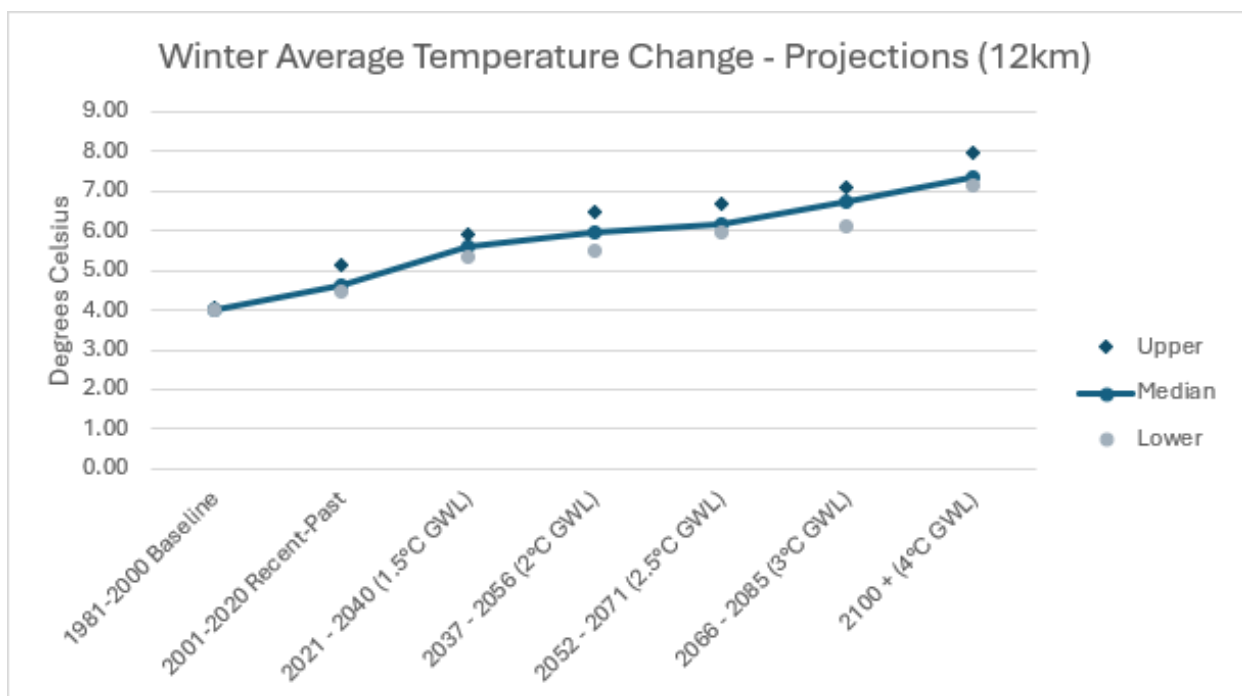


The average summer temperature up to the year 2000 was under 16°C there is a steady rise over the century rising by 4°C by the end of the century with an average summer temperature of 20°C

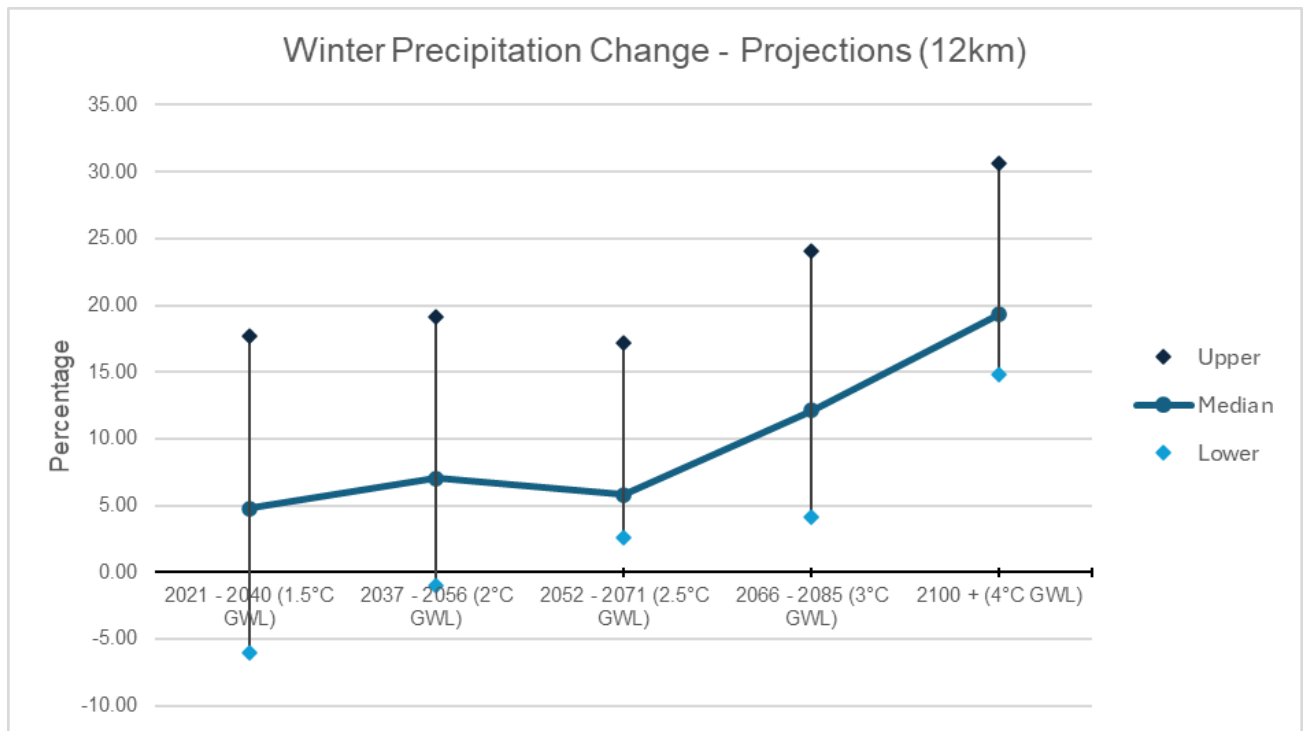


Summer rainfall dropping by over 15 % from current levels with a more rapid decrease from 2079 onwards where rainfall declines by as much as 30% of 2020 levels

Warmer Wetter Winters



A steady rise in average winter temperatures in Coventry over the course of the 21st century approaching at least a 3°C rise based upon current projections



A significant rise in rainfall in Coventry over the course of the 21st century approaching a 5 % increase with a rapid rise from 2070 to as much as 20% based upon current projections.

The data in the models developed by the Met Office Hadley Centre are at a level of detail that relates to the Ordnance Survey's 12km grid across the UK to help inform measures for adaptation and resilience to climate change at the local level.

<https://www.metoffice.gov.uk/research/approach/collaboration/ukcp>

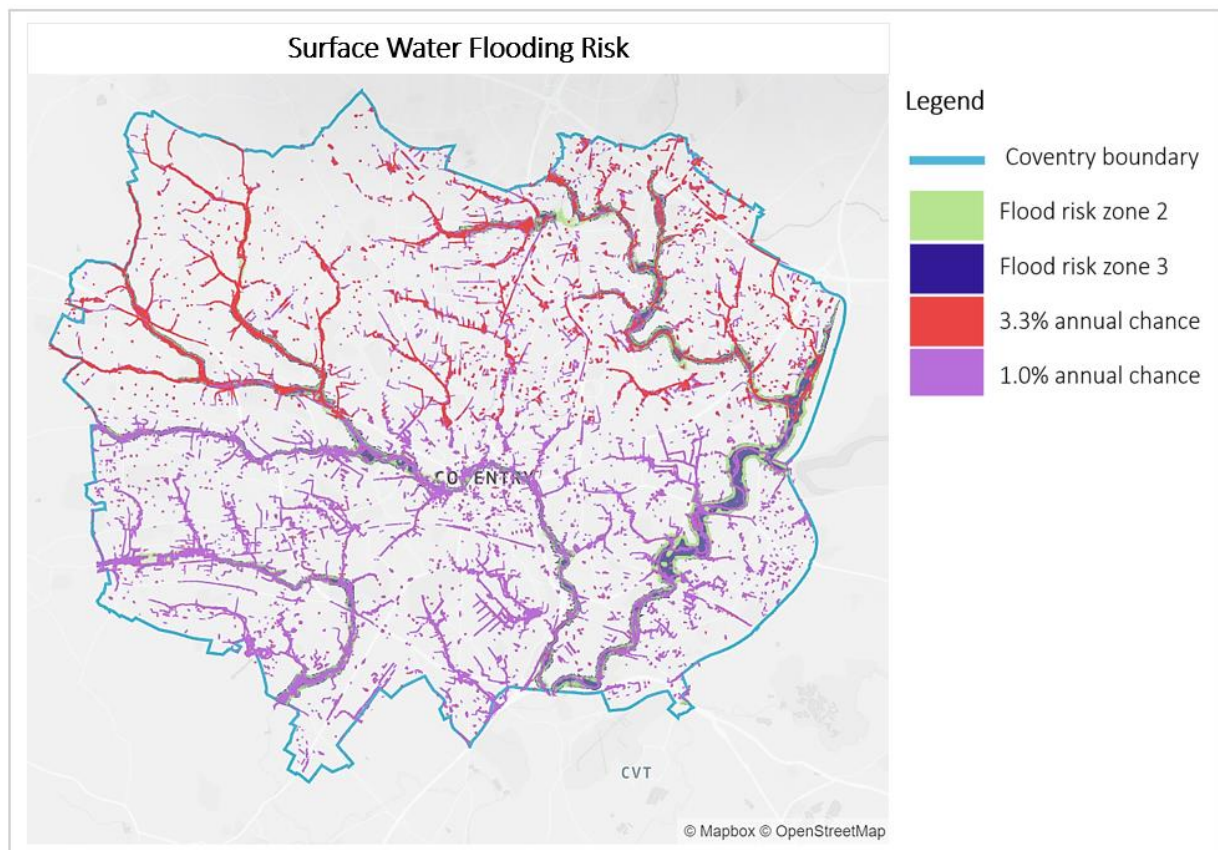
The Group also mapped out geospatial climate data at a higher level of resolution for flood risk and where possible heat. The WMCA have commissioned a more detailed analysis from the University of Birmingham to help with identifying heat islands across the region to build upon the work we have carried out so far.

Risks of flooding

The Environment Agency has three categories of flood risk these are based upon the likely probability of an event happening. Zone 1 which is the largest area of land which could realistically flood under extreme circumstances this is where there is less than 1 in a 1000 year (less than 0.1%) annual chance of a river flood. Flood Zone 2 is where there is between 1 in 100 to 1 in a 1000 year (0.1% to 1.0%) annual chance of flooding. Flood Zone 3 is where there is a high probability of flooding of an area with a 1 in 30 to 1 in 100 year chance (3.3% or higher) of a flood. The floodplain usually relates to that area of land where there is likely to be greater than a 1 in 30 year chance of it being flooded (3.3% or higher). For this reason, special mitigation measures would have to be put in place in order to let any land in this area

to be developed and in many instances there would be a presumption against development.

The latest data from the Environment Agency obtained earlier this year has identified an increased risk of flooding from rivers swelling their banks (Fluvial flooding) the key risk areas for river flooding are Sherbourne, Wyken, St Michaels, Binley & Willenhall or surface water drainage not being able to cope with heavy levels of rainfall (Pluvial flooding) with an increasing incidence of the latter.



Some areas are more prone to flooding whether because people live near a river or in locations that are densely built up where the drains cannot cope with very heavy rainfall and surface water run off from streets and buildings and other hard paved surfaces. Warmer wetter winters are likely to increase the risk of flooding and rainfall in the summer months will also be more severe with an increasing incidence of heavy thunderstorms between long periods of minimal rainfall or drought. Surface run off in the summer months is more likely to increase when the rain falls on the hard dry ground resulting in an increased risk of flooding.

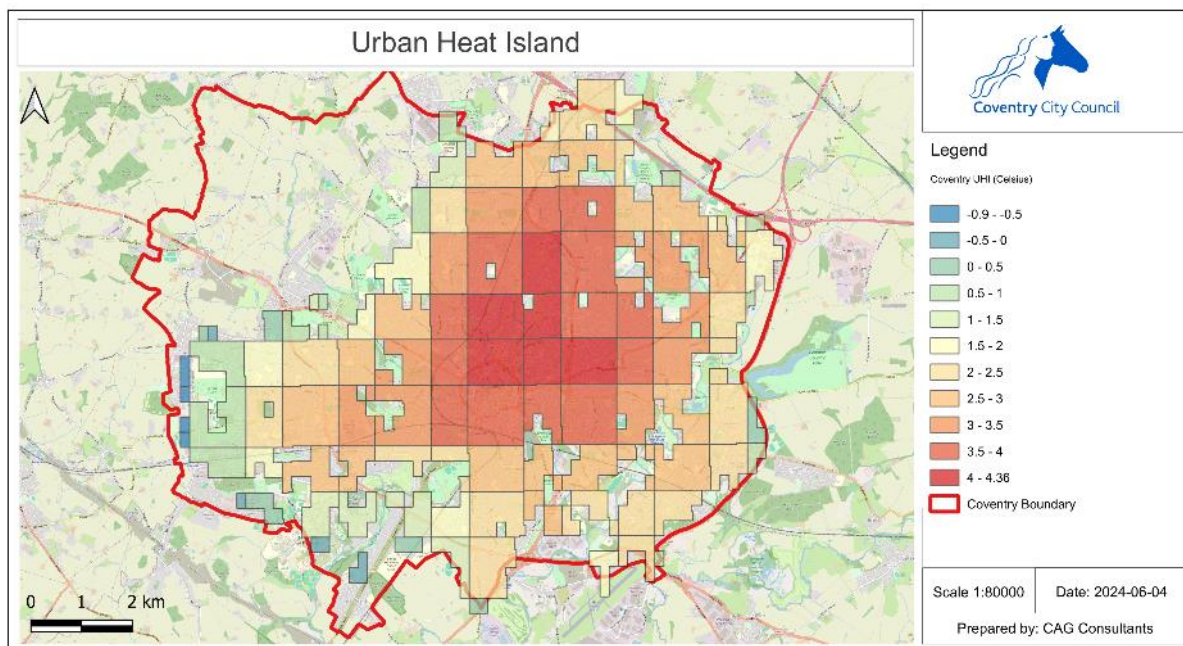
These areas of flood risk are mapped out for the City and areas on which to focus are identified with a new flood risk management plan²

²

<https://www.coventry.gov.uk/downloads/file/19379/coventry-local-flood-risk-management-strategy.pdf>

Extreme heat is affecting our health & wellbeing

The temperatures in cities can fluctuate between different locations by as much as 5°C. The difference between the built up areas in the city centre, often referred to as the 'Urban Heat Islands' and the green areas in the suburbs are noticeably cooler. Parks, gardens, trees, green spaces etc have a vital role to play to help cool urban areas and improve air quality. Coventry has a real need to improve access to green spaces for people, particularly those communities living in the most green-deprived parts of the city to increase resilience during the high temperature periods.



The heat map shows some significant differences in temperature across Coventry depending upon where you live. The more built up an area is the more heat is absorbed whereas green spaces help to reflect the radiation from the sun providing shade which has a cooling effect.

People may be more vulnerable because of their age such as young infants and the elderly and others because that have particular health conditions. Heat and solar radiation can adversely affect air quality to such a degree that it can seriously adversely affect people with circulatory and respiratory diseases such as COPD, asthma and emphysema.

Over the summer of 2023 the UK Health Security Agency estimated there to have been more than 2,000 deaths associated with five separate periods of elevated temperatures with people over the age of 85 yrs being particularly susceptible. Five of the top ten hottest summers on record in the UK have occurred since the year 2,000. The NHS's own '4th Health & Climate Adaptation Report'

<https://www.england.nhs.uk/long-read/4th-health-and-climate-adaptation-report/>

projects that heat-related deaths could well increase six-fold by 2050 if we fail to adapt or reduce carbon emissions by the levels required.

Heat also has social effects as well as placing strains on public services. A study³ of 16,000 different scientific papers revealed that as temperature increases with heatwaves in cities, so does the incidence of crime people become more irritable and aggressive a ten degree increase in temperature increases the risk of violence by 9%.

Drought and issues of reduced Water Supply

As well as the issue of increased heat during summer, reduced rainfall and an increased likelihood of periods of drought will impact on water supply. Due to the growing pressures on our water supply, the Environment Agency is not able to grant new abstraction licences from businesses during the summer when supply is particularly low. Water is being diverted from other sources in order to protect rivers and maintain flows and overall supply. Severn Trent is managing higher levels of water demand in the city as our population grows and currently pumps out 2.3 billion litres of treated water per day, which equates to 95 million litres per hour.

During periods of dry weather and drought there is an increased risk of fires. Cities in the UK are facing a growing threat from an emerging phenomenon called 'firewaves' where the absence of rainfall for a period of ten consecutive days or more can result in fires starting in multiple areas of vegetation placing pressure on emergency services.. In 2022 the West Midlands Fire Service was called to 4,011 fires in the region, a 71% increase from the previous year. The third week of July that year temperatures exceeded 40°C.

Storms and High Winds

The relationship between storms and high winds to climate change is complex. There is not a clear connection between climate change and wind speed, but there is an increasing incidence in the number of storms (particularly in winter) and the severity of the wind gusts and more extreme weather events often associated with warming climate and periods of high rainfall. For every 1 °C temperature rise the moisture content of the air rises by 7%. On the 10th October 2024 an area in Finham was hit by a small tornado causing significant damage to a localised area with the loss of trees and structural damage to roofs and fencing.

Prioritisation of Risks

³ Temperature, Crime and Violence: A systematic Review and Meta-Analysis. Hayon Michelle Choi, Seulkeee Heo, Damien Foo, Yimeng Song, Rory Stewart et al. Environmental Health Perspectives Vol 132, Issue 10, Oct 2024

The Pathway Group assessed the exposure and sensitivity for each of those 40 areas of concern out of the 61 risks detailed in the 'Third UK Climate Change Risk Assessment' (CCRA3) document⁴ were identified as being relevant to Coventry. Each of these 40 potential risks for Coventry was subjected to an assessment by the Pathway Group members from a series of workshops, interviews and meetings. The members of the Group with the support of CAG, Sustainability West Midlands and Slingshot Solutions were required to review risks and identify the level of resources, skills and abilities, organisational and management capacity to address each of the identified potential risks from which they calculated a vulnerability score for each. From this larger list, 24 were considered as either a high or medium priority for action, with some details for those risks that need further consideration over the coming years.

The Pathway Group considered one or more actions to address each of the high and medium priority risks. Some risks need a number of specific practical actions, whilst others may require further research.

The following 11 risks were considered to be of a high priority:

High priority climate change risks for Coventry

Risk and Opportunity Descriptor	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
H 9 - Risks to food safety and food security	3	3	1	5
I 1 - Risks to infrastructure networks (water, energy, transport, ICT) from cascading failures.	3	2	1	4
I 2 – Risks to infrastructure services from river, surface water and groundwater flooding.	3	3	2	4
I 8 - Risks to public water supplies from reduced water availability	3	3	2	4
H 1 - Risks to health and wellbeing from high temperatures	1	3	1	3
H 3 - Risks to people, communities and buildings from flooding	2	3	2	3

⁴ <https://www.ukclimaterisk.org/publications/technical-report-ccra3-ia/>

H 7 - Risks to health and wellbeing from changes in air quality	3	2	2	3
H 10 - Risks to water quality and household water supplies	2	3	2	3
H 12 - Risks to health and social care delivery	2	2	1	3
H 13 - Risks to education and prison services	2	2	1	3
B 1 - Risks to businesses from flooding	2	3	2	3

And the following 13 risks were considered a medium priority

Medium priority climate change risks for Coventry

Risk Theme	Risk and Opportunity Descriptor	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Business and Industry	B 5 - Risks to business from reduced employee productivity due to infrastructure disruption and higher temperatures in working environments	3	1	2	2
	H 5 - Risks to building fabric	2	2	2	2
Health, Communities and the Built Environment	H 6 - Risks and opportunities from summer and winter household energy demand	2	1	1	2
	H 8 - Risks to health from vector-borne disease	0	2	0	2
	I 4 - Risks to bridges and pipelines from flooding and erosion	3	2	3	2
Infrastructure	I 5 - Risks to transport networks from slope and embankment failure	2	1	1	2

Risk Theme	Risk and Opportunity Descriptor	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Natural Environment and Assets	I 10 - Risks to energy from high and low temperatures, high winds, lightning	2	1	1	2
	I 12 - Risks to transport from high and low temperatures, high winds, lightning	2	1	1	2
	I 13 – Risks to IT from high and low temperatures, high winds, lightning	2	1	1	2
	N 4 - Risk to soils from changing climatic conditions, including seasonal aridity and wetness.	2	1	1	2
	N 11 - Risks to freshwater species and habitats from changing climatic conditions and extreme events, including higher water temperatures, flooding, water scarcity and phenological shifts.	2	2	2	2
	N 12 - Risks to freshwater species and habitats from pests, pathogens and invasive species	1	2	1	2
	N 18 - Risks and opportunities from climate change to landscape character	2	2	2	2

Challenging the way the Council and its partners work.

In addition to tackling the specific risks detailed above, a number of universal actions were also identified for the partnership to address in the future, which organisations may need to work more collaboratively on in order to be more effective at addressing future trends. These covered data gathering, data sharing and use of Geographical Information Systems. The development of information dashboards with the agencies involved to share management information and monitor progress in delivering outcomes will be particularly useful. The need for training and raising awareness across the City working with businesses and communities in helping them to adapt to the changes in weather they are facing will be vitally important in the future.

One of the most significant universal actions is to work with representatives in local communities in an effort to help neighbourhoods to become more resilient in the face

of extreme weather so that communities and the organisations which serve them can better prepare and protect their neighbourhood their homes, friends and family and to have the ability to recover more quickly when events occur.

Independent Assessment of the Pathway Group

This was assisted by the WMCA, which funded 'Climate Sense', a national specialist adaptation and resilience consultancy to assess all the local authorities in the Combined Authority area and their ability to address adaptation and resilience issues for their own organisations, protecting the services they provide and working with partners to safeguard the City and its people.

Coventry has received an initial favourable assessment from Climate Sense and is in the process of receiving a further more detailed assessment. At present the city is demonstrating efficient management and is on target to start the delivery of breakthrough projects such as extension of wetlands with a major rewilding project at Brandon Wood and future SUDs proposals all of which will help to reduce exposure to riaks.

Practical actions to adapt to Climate Change

Over 90 specific actions are proposed by the Council and its partners which address the 24 key High and medium risk areas of concern to the City. These are summarised in this document under key types of activity and intended outcomes, the full action plan can be found in detail in the main Strategy and Action Plan document⁵.

Understanding and minimising risks for the delivery of public services and promoting health

There are many organisations delivering front line services for the public in the private, voluntary and public sector and it is critical that they **understand the risks** and how they may affect the public, especially those people who may be particularly vulnerable to their effects. This will also involve **reviewing contracts for the delivery of services** to ensure that risks from extreme weather events are addressed.

We will need to audit our facilities and ways of working to **prevent disruption to service delivery**, to be able to cope and



provide support, no matter what the circumstances may be when experiencing extreme weather events.

We will also need to obtain better quality information about such events at the local level to map out the details to **assist forward planning. This will improve the quality of service delivery** as well as **prevent any adverse effects** of climate events on the public. One such area that the WMCA is working with the Council on with the support of Birmingham University is the development of the **Climate Risk & Vulnerability Assessment (CRVA) Mapping Tool** which is being developed for use by all the local authorities as a planning and management tool. We have insufficient data on the effects of heat at the very local level, this is needed so that we are better able to identify where the heat islands exist (i.e. locations of hot spots) across the city. An improved level of detail concerning heat islands resulting from the work of the Met Office and that of the University of Birmingham for the Climate Risk should help with targeting of locations landscaping and urban design resulting in significant improvements to the living conditions for the population of the City.

There are real risks of significant cost implications to service providers in protecting property and infrastructure in the future whether that be maintenance and repair, capital improvements or higher insurance premiums as a consequence of enhanced risks. Providers of key services that are critical to the functioning of our city such as energy supply, telecommunications, transport, emergency services, water supply and digital data networks are to meet and **share their risk assessments, models and management plans**. To help **set priorities for action and explore connectivity** and managing those possible situations when extreme weather events can result in several service failures where one can affect the other in what are known as **cascading failures**. These sessions will help the organisations **to better predict and adapt to change** and where possible pool resources to make a real difference and **enhance the overall resilience of the City**.

Working with natural systems to cool the City down, reduce the risk of flooding and help to conserve water.

Much of the rain falling in the city like in many cities around the world lands on hard impervious surfaces. Often the rate of flow exceeds the levels that the local drainage network are able to cope with resulting in an increased rate of flow and an increased risk of localised surface water flooding.

The development of **Sustainable Urban Drainage Schemes** (SUD's) promote the use of natural features and localised vegetation with porous surfaces. The use of natural vegetation slows the rates of flow reducing the risk of flooding often providing a natural filtration system that helps to remove pollutants from the water.

With the projected growth in the city's population and the likely increasing demand for water, the city will need to promote water conservation methods in new

developments. We will be encouraging developers and investors to adopt best practices and to innovate in addressing the challenges that changes in our weather patterns will present and some Policies in the Local Plan will help to address this.

In addition to Sustainable Urban Drainage Schemes (SuDS) we will be advocating new approaches to **promote water conservation** such as the use of water efficient showers and taps, low-flush toilets and the introduction of **grey water systems** where waste water from showers and sinks is re-used for flushing toilets or watering gardens. In countries like Australia where water is more scarce, grey water systems are in common usage but not in the UK as yet. Property owners will be encouraged to adopt low cost measures such as the use of water butts to **collect rainwater** from downpipes for use in watering gardens etc and the use of **more efficient irrigation methods** such as trickle hoses will be encouraged for watering plants.

Severn Trent Water is working with partners and making significant investments for **minimising leaks, replacing pipes**, improvements to storm overflows across the City network and increasing capacity for water supply with a recent £78m upgrade of **the treatment works at Finham** including a 4million litre mega tank.

The City Council with its partners will continue to progress its ambitious **Urban Forestry Strategy to plant over 360,000 trees by 2031** with 20% of the City having a canopy cover. Improved standards for tree maintenance will be used and plants especially street trees that are better adapted to the hotter drier summers will be selected for use.

Large areas of concrete surfacing store the heat from the sun creating what are often referred to as heat islands sometimes creating temperatures that are as much as 4 to 5 °C higher than cooler spaces nearby. Green plants on the other hand, reflect much of the incoming solar radiation, as well as often providing shade. All of which helps to reduce the surface temperatures that people are exposed to. In cities like London we can find lots of examples of the use of **turf roofs and living walls** where growing plants on buildings help to cool the buildings down and also help to clean the air of pollutants. The City's planning policy team will encourage the integration of such features in new development and refurbishments where possible.

We need to increase access to green and blue space in the city. **Creating and improving the quality of green spaces** in the most green-deprived and built-up areas is a priority, which would help to improve air quality, create a cooling effect, reduce flood risk and promote well-being by connecting residents to nature. Some areas of green space especially near rivers can be allowed to flood as a store for excess water slowing the rates of flow and diverting flood waters away from local housing and development. There is a proposal for the transfer of water through a new pipeline from Minworth to the Coventry Canal at Atherstone where the water will then pass through the Coventry, Oxford and Grand Union Canal transferring 115million litres of water from the Midlands to meet demands in the South East. This may also be of benefit to Coventry during periods of water shortage.

The Council is actively addressing this through 'Green for All', receiving just under £1m through the Nature Towns and Cities programme to develop a new green and blue plan for the city to put nature at the heart of placemaking. This will involve identifying opportunities to improve spaces and create new ones, engaging communities and delivering training over the next 2.5 years. The Council is working with a number of partners on this ambitious project, including Warwickshire Wildlife Trust, John Muir Trust, National Trust, Coventry University, University of Warwick, Garden Organic, Historic Coventry Trust and Grapevine.

The Coventry Grows Project is helping to identify and transform new areas of greenspace supporting community organisations to use Council land for amenity, wildlife conservation and food growing. The project has been funded by E.ON, with support from Garden Organic and Grapevine working in some of the least green parts of the city. This contributes to reducing the risk of flooding by slowing the rate of flow of water, promote natural water filtration as well as helping to cool the city.

PICTURE OF LOCAL RESIDENTS GARDENING ON AN AREA OF ADOPTED GREENSPACE

The Council is soon to launch a community growing sites policy, which will enable residents and community groups to lease unused Council land for gardening, which could include food growing, wildlife gardening and planting of fruit trees. This will help to address the issue of food security and rising food prices. We will also be seeking funding and resources also will include providing support for the **development of social enterprises** relating to food growing and cookery skills **making food available to benefit families** living in disadvantaged communities. The City will also find ways of addressing the fundamental issues of security of supply food distribution and supply for in times of emergency or crisis working with the Food Network in applying the 7 steps to narrowing the UK civil food resilience gap outlined in the 'Just in Case' Report⁶ to the National Preparedness Commission but applied to the local context.

Learning from the City's multi agency work to address fuel poverty the experiences of identifying warm refuges for vulnerable people to go to in the cold winter months aims to do likewise in identifying cool spaces '**cooling centres**' for people to go to in the hot summer months.

In addition to keeping cool in summer and despite the predicted rise in temperature in the winter months there are still risks from the effects of cold and the rising humidity levels in the winter months are likely to have an adverse affect on indoor living conditions with increased damp and mould. The increased volatility, such as sharp cold snaps interspersed with mild, wet, and stormy periods, can cause even more damage and health risks than consistent, predictable winters. Furthermore, the

⁶ https://nationalpreparednesscommission.uk/wp-content/uploads/2025/02/NPC-Just-in-Case-Executive-Summary_PDF-Download.pdf

financial costs associated with repairing damage and adapting to a wetter, more unstable climate will likely lead to lower overall living standards for many.

The City Council is working with Eon its strategic energy partner on a improving the energy efficiency to improve comfort levels in homes through a series of practical energy efficiency retrofit programmes for those less energy efficient households. The Strategic Energy Partnership is also addressing ways of reducing bills for those in fuel poverty using methods of storing electricity from off peak periods to use at other times when needed. The increased volatility, such as sharp cold snaps interspersed with mild, wet, and stormy periods, can cause even more damage and health risks than consistent, predictable winters. Furthermore, the financial costs associated with repairing damage and adapting to a wetter, more unstable climate will likely lead to lower overall living standards for many. With support from the University of Birmingham's indoor air quality specialists the retrofit teams are monitoring how different energy efficiency measures affect living conditions before and after retrofit to make sure the best approaches are adapted for use for each of the specific housing types which improve living conditions the most and reduce the risk of damp and mould etc.

Raising awareness and working with communities to make practical tangible differences at the local level.

Using our approach to engaging residents and local business in neighbourhood improvements, the Team aims to work with colleagues in WMCA and in neighbouring Authorities to promote and assist the development of Neighbourhood resilience teams. Local residents will be encouraged to support one another in creating liveable spaces that protect those living in the vicinity from extreme weather events and to make where they live more resilient in the face of droughts and extreme temperatures. This work has started with some WMCA funded **'World Café community events targeting the four most vulnerable community areas notably Longford, Hillfields, Foleshill and Radford.**

A Flood Risk Management Strategy and Plan and a Surface Water Management Plan for Coventry are in place. There are plans to work with neighbourhood groups to raise awareness of risks and our ability to address them, and **promote best practice for households**, which can help to conserve water or reduce levels of surface water run off and flood risk.

One initiative of concern is the extensive laying of hard paving for car parking in front gardens using impermeable surfaces, which increases the risk of surface water flooding at the neighbourhood level. Working with organisations like the Royal Horticultural Society (RHS) and Garden Organic, we can establish **some demonstration front gardens** which can accommodate parking, whilst not detracting upon the streetscape or the appearance of the property. This can be done

through using surfaces that allow for vegetation and shade as well as the conservation of water to promote examples of best practice for local residents to see. Local Planning policy will be used to stimulate designs which help to reduce rates of flow and to conserve water such as rainwater harvesting.

We will work with medical practitioners in providing accessible information and advice to residents with certain clinical conditions and respiratory illnesses (such as Asthma and COPD). This will help to provide information about the levels of pollutants at any moment in time to let vulnerable residents know where and when it is safe to go out.

Schemes such as the **'Air Alert' App** used in Hampshire and West Sussex have proved very successful in providing advice and guidance and are well received by GPs and patients alike.

Providing training and advice to frontline staff who are providing care for people in need will help them to reduce the risk of exposure to extreme weather events. Staff and volunteers in community organisations, the emergency services, the Council and the NHS, all have an important role to play. With the right knowledge, confidence and skills they can really help vulnerable residents and families in the best and most cost-effective ways to keep cool and protect themselves and their homes from the effects of extreme weather.

The increasing risk of extreme weather events will place increasing pressure on finding solutions to complex problems that will require greater levels of **innovation and experimentation** for finding workable solutions over the years ahead.

The City Council and its partners will continue to lobby for greater recognition, legal powers and resources to enable and facilitate actions and influence future developments to better protect Coventry's citizens, businesses and the environment from the effects of extreme weather events.

These are some examples of just some of the actions which are proposed the challenge which lay ahead is the Partnership finding the resources and ways in which to make them happen.

[ADD LINK TO RISK ASSESSMENT, FULL STRATEGY & PLAN]

The following pages outline some of the things citizens can do to address the risks of extreme weather events on homes and neighbourhoods

Building awareness is critical to help citizens understand what is likely to happen so they can better prepare for it and also help to reduce their impact:

The Met Office Climate Change pages to are a valuable tool for people to see what changes in the weather you are likely to find in Coventry with different global

temperature rise scenarios. Remember the famous Paris Agreement recommended to nations to contain the temperature rise to 1.5°C overall to reduce the risk of more extreme weather patterns. <https://climatedataportal.metoffice.gov.uk/pages/lacs>

PREPARING FOR FLOODS

If residents live in a flood risk area they need to think about what actions need to be taken in the event of a flood. Residents can check if your home is one of the 6.3m properties in England at risk of flooding visit the Flood Hub website [Am I at Risk? | The Flood Hub](#).

It's important that residents have a plan for what to do if their home is about to be flooded, know what valued possessions are downstairs that need to be taken upstairs and what to do regarding safety e.g. turning off utilities, checking on neighbours etc. Refer to the Environment Agency Floodline <https://check-for-flooding.service.gov.uk/>

Tel: 0345 988 1188

Elevate valuables in basements and use waterproof containers.

Homes can be made more resilient if when rewiring consideration is given to location of electrical sockets and electricity cabling, fuseboxes, MCB Boards etc raising to higher levels in the basement and ground floor and using water resistant materials to prevent further damage and disruption when returning home.

Other practical measures include the use of rodent resistant backwater valves on sewage pipes to prevent sewage backing up into homes at times of flooding. This also has the added advantage of making it more difficult for rodents to gain entry to homes.

Residents can also replace old air bricks with flotation air bricks which close up with rising water levels to prevent water getting into basements.

It is recommended that when undertaking home energy efficiency improvements that cavity wall insulation installed is water repellent for those living in a flood risk area.

Residents should also avoid paving driveways with concrete slabs and tarmac, instead using porous materials such as gravel and permeable surfaces which allow the water to drain away.

Flood barriers should be installed for use in doorways at times of flooding.

A useful guide from the Flood Hub is the Property Flood Resilience Booklet <https://thefloodhub.co.uk/wp-content/uploads/2018/09/FT-Q-R38-R2-Property-Flood-Resilience-PFR-booklet.pdf>

DEALING WITH EXTREME HEAT

Younger children, older people and people with respiratory illnesses are particularly vulnerable to heatwaves.

It is recommended to plant trees to provide shade to homes and gardens. Residents should seek advice as to what trees to plant and at what distance from the home to not damage property foundations.

Grow plants which are more drought tolerant to reduce need for watering.

Reflective window film or blinds can be used to reflect heat away from the house.

It is advised to designate a cool room with fans and blackout curtains for those sweltering hot days and make sure to have jugs of cool tap water in the fridge to keep hydrated.

People should avoid the sun during the hottest hours 11am to 3pm and see that older relatives and children are feeling okay.

Useful guidance from the Government website 'Beat the heat: staying safe in hot weather guidance' gives lots of useful health and safety advice:

<https://www.gov.uk/government/publications/beat-the-heat-hot-weather-advice/beat-the-heat-staying-safe-in-hot-weather>

CONSERVE WATER

A person can use anywhere between 3,650 to over 20,000 litres of water a year just flushing the toilet. Make sure you have the more modern flushes which conserve water use toilet flushing systems which use less water 6 litres a flush.

It's recommended to use the shower more often than baths which hold up to 200 litres of water, whereas a shower uses 50 to 60 litres on average and a 4 minute efficient shower uses around 36 litres.

Fix leaking taps can waste up to 60 litres of water a week.

Fit water butts to downpipes which collect rainwater from roofs for watering plants.

Use trickle hoses (soakers) to water plants, especially vegetables, as they use much less water and are better for the soil and plants and don't require manual watering so save time. Use watering cans instead of regular garden hoses where possible.

Keep tap water cold in water bottles during the hot summer months

Use mulch on plants helps to keep the soil moist and reduces water loss in gardens.

Look up the Severn Trent website with lots of practical tips for saving water in the home <https://www.stwater.co.uk/wonderful-on-tap/save-water/>

<https://thefloodhub.co.uk/am-i-at-risk/>

COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Title of EIA		Coventry Climate Adaptation and Resilience Plan
EIA Author	Name	Bret Willers
	Position	Head of Sustainability & Climate Change
	Date of completion	20/02/2026
Head of Service	Name	Rhian Palmer
	Position	Strategic Lead – Green Futures
Cabinet Member	Name	Cllr Jim O’Boyle
	Portfolio	Jobs, Regeneration and Climate Change

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?

This Equality Impact Assessment relates to the development of the City’s first Adaptation and Resilience Plan

Following an extensive period of partnership activity to undertake a detailed risk assessment of all the potential risks of extreme weather events and changes to the climate and identify priorities for action which address the effects of extreme weather flooding, extreme heat, cold weather, high winds and water shortages. Much of this work has been mapped geospatially to address issues in those locations which are at greatest risk.

The Plan proposes targeting those communities and activities most at risk as well as targeting particular vulnerable individuals with specific health conditions such as respiratory illnesses and also

Key Strategy and Plan covers::

- **Climate Adaptation & Resilience Strategy development** – creating a citywide strategy, climate risk assessment and geospatial risk mapping to guide priority actions. [\[coventry.gov.uk\]](https://coventry.gov.uk)

- **Local climate data and benchmarking** – participating in DEFRA’s ARP4 pilot and WMCA working group to compare Coventry with other UK cities and strengthen the evidence base. [coventry.gov.uk]
- **Citywide Climate Vulnerability Assessment** – identifying heat, rainfall, extreme wind, and flood risks; mapping exposure; and prioritising risks affecting residents (and particular vulnerable groups in the population), infrastructure, businesses and services.
- **Adaptation Implementation Plan** – delivering practical resilience actions such as community food hubs, water-saving campaigns, cooling centres, water-quality monitoring, tree planting and climate-adaptive infrastructure including specific measures to address the needs of those who are most vulnerable e.g. infants, elderly and disabled
- **Integrated, people-centred delivery approach** – ensuring actions are locality-sensitive, nature-based and delivered collaboratively across city partners particularly in areas at risk (i.e. which are notably primarily located in the City’s priority neighbourhoods).
- **Use of national best practice** – drawing on over 20 exemplars UK adaptation projects and leading local authority models to shape Coventry’s resilience planning

The outcomes from the work will help to protect the population from extreme weather events and also help to ensure continuity of service and resilience and to make the case for funding specific actions with the relevant bodies.

1.3 List organisations and people who are involved in this area of work

A very large number of organisations were involved in the development of the Plan many associated with the city’s Independent Climate Change Board and others...

CCC Services – climate change & sustainability, flood risk management, transport, highways, economic development, public health, parks, City Centre South regeneration, adult social care, adult education & skills, outdoor education

Environment Agency, CSW Resilience Team, Severn Trent, Canals and Rivers Trust, Citizen Housing, Warwickshire Wildlife Trust, Highways UK, Eon, National Grid, Cadent, City Fibre, NHS ICB & Hospital Trusts, Grapevine, WMCA, DEFRA, Met Office, Coventry University, University of Warwick, University of Birmingham, Forestry Commission, National Trust, Food Network, Garden Organic, Coventry College.

Also to be involved in the future will be Faith Groups, voluntary and community organisations with interests in the issues and also those living and working in those neighbourhoods most at risk (see CAVR)

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

Bret Willers – Head of Sustainability & Climate Change



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

Data Sources to consider are :

- Previous research - consultation or EIAs carried out
- Customer feedback - including complaints, comments, surveys
- Employee feedback - including surveys, workforce monitoring, trade unions
- Specialist feedback - including focus groups, technical experts, subject specialists
- Feedback from organisations - such as those representing target groups
- National and local statistics –
 - National guidance or legislative requirements
 - Census data
 - Audit information
 - JSNA
 - Public health profiles
 - LG inform
 - Census
 - Office for National Statistics
 - Facts about Coventry
 - Breakdown of Coventry by Protected Characteristic
 - Armed Forces Veteran Data

Where possible, when you are analysing the data please try and break the data down by protected characteristic and additional groups.

2.1 Baseline data and information to include data

Please include a summary of data analysis below, using both your own service level management information. Where possible, compare your data to local data using: Facts about Coventry; Census 2021; JSNA etc

The Climate Risk and Vulnerability Assessment (CRVA) map, developed by the West Midlands Combined Authority identifies which areas in Coventry are the most vulnerable to climate risks. The map takes into account three factors: climate hazards (consisting of nine climate related physical events and trends that may cause loss or damage), socioeconomic vulnerability (how susceptible people are to the effect of climate hazards) and exposure (the proportion of the population exposed to the climate hazards). The map shows that 46 out of Coventry's 195 Local

Super Output Areas (LSOAs) overall CRVA score places them in the highest climate risk and vulnerability category. This is 24% of LSOAs in the city.

The majority of these LSOAs are concentrated in the following wards: Longford, Foleshill, Radford, Upper Stoke, Lower Stoke and Sherbourne. Together, the population of these wards account for 37% of Coventry's population. The following shows the percentage of residents in these wards who are Asian/ Asian British, Black / African/ Caribbean/ Black British and mixed/ multiple ethnic groups:

Ward	Asian/ Asian British	Black African Caribbean, Black British	Mixed/ multiple ethnic groups
Foleshill	44.8%	12.2%	3.6%
Radford	23.2%	9.3%	3.6%
Longford	17.7%	9.3%	4.2%
Sherbourne	9.4%	6.9%	3.1%
Upper Stoke	21.7%	10%	3.4%
Lower Stoke	17.3%	13%	3.7%

Given the large proportion of Coventry's population that is ranked in the highest CRVA risk category, around 14,735 residents across the six named most vulnerable wards are above the age of 65 and likely to be more vulnerable to the effects of climate risks.

2.2 Please highlight which Marmot Principles this EIA supports

1. Give every child the best start in life
2. Enable all children, young people and adults to maximise their capabilities and have control over their lives
3. Ensure a healthy standard of living for all
4. Create fair employment and good work for all
5. Create and develop healthy and sustainable places and communities
6. Strengthen the role and impact of ill health prevention
7. Tackle racism, discrimination and their outcomes
8. Pursue environmental sustainability and health equity

SECTION 3 – Protected Groups and Additional Groups



3.1 Based on section 2, 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)

Please include considerations of health and digital inequality as part of your analysis below.

Protected Characteristic	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Age 0-18	P	Infants and early years can be particularly vulnerable to the effects of extreme heat as young people respond differently to heat than adults heating up faster, sweating less efficiently and more exposed to the risk of dehydration. Extreme weather events can also disrupt learning flooding in schools or the effects of heatwaves and risks of injury during periods of extreme cold. Younger people with respiratory illnesses are particularly vulnerable to damp condensation and mould which are key risks with an increase in warmer wetter winters. Extreme weather events have also been found to have affect on anxiety and mental health for young people. The Actions in the Plan if successful with reduce the risk of such incidents occurring. • Cooling centres, heatwave planning and tree-shade expansion reduce risk of heat-related illness, benefiting older people and young children who are more vulnerable to extreme temperatures. • Flood-resilient infrastructure and improved emergency responses provide better protection for households with children and older adults.
Age 19-64	P	Extreme weather events can have significant impacts on damage to property and cause serious disruption to homes and businesses with an economic impact for repair of damage or increased insurance premiums. People with respiratory illness, COPD or cardio vascular disease are also particularly vulnerable e.g. extreme heat and increasing levels of uv and its impacts upon pollutants and air quality or wetter warmer winters increasing the likelihood of damp and condensation with increasing levels of harmful mould spores affecting respiratory health. The Actions in the Plan if successful with reduce the risk of such incidents occurring.

		- Cooling centres, heatwave planning and tree-shade expansion reduce risk of heat-related illness, benefiting older people and young children who are more vulnerable to extreme temperatures. - Flood-resilient infrastructure and improved emergency responses provide better protection for households with children and older adults.
Age 65+	P	Older adults as with the above are more vulnerable to those conditions and also vulnerable to extreme temperatures whether hot or cold Heatwaves are likely to become increasingly common which when they occur are becoming increasingly likely to be more extreme in future years. The Actions in the Plan if successful with reduce the risk of such incidents occurring. - Cooling centres, heatwave planning and tree-shade expansion reduce risk of heat-related illness, benefiting older people and young children who are more vulnerable to extreme temperatures. - Flood-resilient infrastructure and improved emergency responses provide better protection for households - Training and advice for front line medical and domiciliary care workers to support people at risk.
Disability	P	People with disabilities are two to four times more likely to die or be injured during extreme weather events due to increased vulnerability, inaccessibility and exclusion during emergency situations key effects include dangerous inaccessible evacuations, disruptions to life-sustaining medical equipment, heightened risks from extreme heat or cold and limited access to critical information. - Infrastructure upgrades and nature-based improvements can enhance accessibility, particularly during extreme weather events. - Emergency planning and cooling/warm spaces improve safety for people with physical, sensory, learning or mental health impairments who may need additional support.
Gender reassignment	N	
Marriage and Civil Partnership	N	



Pregnancy and maternity	P	Extreme weather events can increase the risks of gestational complications, pregnancy loss, restricted foetal growth, low birthweight, preterm birth and delivery complications. Exposure to extreme heat increases the risk of pre-term births a leading cause of infant mortality and can also create complications for the mother. It is also important to note that the direct and indirect impacts caused by such events can have a synergistic and cascading impact upon pregnancy health. Better air quality, cooling centres and improved access to safe community spaces benefit pregnant women who are more sensitive to heat and pollution.
Race (Including: colour, nationality, citizenship ethnic or national origins)	P	The areas most effected by extreme weather events are Radford, Hillfields, Longford, Foleshill, Willenhall, Sherbourne, many of these areas are priority neighbourhoods. With the exception of the latter there are at least 30% of the population in those locations being from the Global majority communities
Religion and belief	N	
Sex	N	
Sexual orientation	N	

3.2 Based on section 2, complete the table below to show what the potential impact is for each of the additional groups.

Group	Impact type P, N, PN, NI	Nature of impact and any mitigations required
Care Experienced	N	
Armed Forces	N	
Social Economic Groups	P	Targeting the establishment of Neighbourhood Resilience Groups within the priority neighbourhoods to raise awarenessss and target community action at the household and neighbourhood community level

SECTION 4 –Next steps

Planned Action	Owner	Timescale
Oversee implementation of the Actions identified in the Action Plan	Bret Willers	2026-2030

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

The Individual Projects and Actions are reviewed on a regular basis with an annual review of progress in delivering the Plan

SECTION 5 – Impact on Council Staff

5.1 Will this area of work potentially have an impact on Council staff? Yes/No

If yes

Nature of impact and any mitigation required

Yes

Can help to address working conditions during periods of extreme weather e.g. with review of policies relating to working conditions indoors and out during periods of extreme heat to reduce exposure to adverse conditions and potential mitigation measures to protect the work force during such periods.

5.2 Please provide headcounts for the below.

If you think by completing this section's headcounts, employees will become identifiable please email equality@coventry.gov.uk for advice on data protection implications

Impact on Council staff - Sex

Female

Potentially all staff irrespective of gender or disability or potentially specific measures for those with specific health conditions which render them vulnerable e.g. extreme temperatures

Women especially lone parents may experience greater impacts from displacement or service disruption due to extreme weather improved resilience reduces the risk.

Male

Potentially all staff irrespective of gender or disability or potentially specific measures for those with specific health conditions which render them vulnerable e.g. extreme temperatures

Men often over-represented in outdoor/manual work and may benefit from heat-related & UV exposure risk reduction measures

Impact on Council staff - Disability

Disabled

Not disabled



Prefer not to state

Unknown

Impact on Council staff - Ethnicity

White

Black, Asian, Minority ethnic

Prefer not to state

Unknown

Impact on Council staff – Sexual orientation

Heterosexual

LGBT+

Prefer not to state

Unknown

Impact on Council staff – Age

16-24

25-34

35-44

45-54

55-64

65+

Impact on Council staff – Religion

Any other

Buddhist

Christian

Hindu

Jewish

Muslim

No religion

Sikh

Prefer not to state

Unknown

SECTION 6 – Completion Statement

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

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

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.

SECTION 7 - Approval



COVENTRY CITY COUNCIL - EQUALITY IMPACT ASSESSMENT (EIA) 2025

Name of Head of Service: Rhian Palmer	Date approved by Head of Service:
Name of Director: Andy Williams	Date sent to Director:
Name of Lead Elected Member: Cllr Jim O'Boyle	Date sent to Councillor:

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