
Cabinet

12 March 2024

Name of Cabinet Member:

Cabinet Member for Jobs, Regeneration and Climate Change - Councillor J O'Boyle

Director approving submission of the report:

Director of Property Services and Development

Ward(s) affected:

St. Michael's

Title: City Centre South – Appropriation of Land for Planning Purposes and Use of Section 203 of the Housing and Planning Act 2016

Is this a key decision?

No

Executive summary:

City Centre South (CCS) will deliver transformational improvements to Coventry city centre through the creation of a new residential led community providing new homes, jobs, commercial and leisure opportunities and high-quality public spaces.

In January 2022, as part of a wider report authorising the making of a Compulsory Purchase Order (CPO) to support scheme delivery, Cabinet approved the appropriation of the land needed for the development for planning purposes and the application of Section 203 of the Housing and Planning Act 2016 in order for certain third party rights over the land to be overridden and enabling anyone who suffers loss in terms of a reduction in value of their land to be able to claim statutory compensation.

Since Cabinet considered these matters in January 2022, the CCS scheme now has a Planning Consent (Ref: PL/2023/0002218/RVC) establishing current development parameters for the scheme and it is appropriate for the appropriation of the scheme land and application of Section 203 to be considered within this context.

Recommendations:

Cabinet is recommended to:

- 1) Resolve to appropriate for planning purposes the land owned by the Council within the proposed redevelopment site shown on the plan at Appendix 1 to the report pursuant to section 122 Local Government Act 1972 in order to facilitate the CCS scheme.
- 2) Authorise the Director of Property Services and Development, following consultation with the Director of Law and Governance, the Director of Finance and Resources and the Cabinet Member for Jobs, Regeneration and Climate Change, to settle claims for compensation under s204 Housing and Planning Act 2016 in respect of rights, interests or restrictions which are overridden and/or to reach agreement for the release of any such rights etc. by affected third parties
- 3) Delegate authority to the Director of Property Services and Development, following consultation with the Director of Law and Governance, the Director of Finance and Resources and the Cabinet Member for Jobs, Regeneration and Climate Change, to:
 - (a) Place statutory advertisements as required by section 122(2A) Local Government Act 1972 of the Council's intention to appropriate for planning purposes the open space land in the Council's freehold ownership shown on the plan at Appendix 2 to the report; and
 - (b) Consider any representations received in response to the statutory advertisements referred to in paragraph (a) above and to decide whether any such land should be appropriated for planning purposes and dispose of to facilitate the CCS scheme; and
 - (c) Take all necessary, incidental or ancillary steps for the carrying into effect any of the recommendations set out in this report.

List of Appendices included:

The following appendices are attached to the report:

Appendix 1: Land within the Council's freehold ownership proposed for appropriation for planning purposes excluding open space

Appendix 2: Open space land within the redevelopment site in respect of which public notice of intention to appropriate for planning purposes is proposed to be given

Appendix 3: Land within the Council's freehold ownership previously appropriated for planning purposes pursuant to a Cabinet decision dated 11 January 2022 (excluding open space)

Appendix 4: Open space land within the redevelopment site previously appropriated for planning purposes following a statutory advertisement process undertaken during 2022

Background papers:

Copy of The Council of the City of Coventry (City Centre South, Coventry) Compulsory Purchase Order 2022 (<https://www.coventry.gov.uk/viewcpo>)

Statement of Case for the CPO (<https://www.coventry.gov.uk/viewcpo>)

Other useful documents

Report to Cabinet 11th January 2022 “City Centre South Land Acquisition and Compulsory Purchase Order”

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: City Centre South – Appropriation of land for Planning purposes and use of Section 203 of the Housing and Planning Act 2016

1. Context (or background)

- 1.1. On 11th January 2022, Cabinet approved the making of the Compulsory Purchase Order (CPO) for the City Centre South (CCS) scheme as well as approving the appropriation of the relevant land for Planning purposes and the application of Section 203 of the Housing and Planning Act 2016 in relation to third party rights. The land shown on Appendix 3 to this report was appropriated for planning purposes pursuant to the Cabinet decision taken on 11 January 2022. The land shown on Appendix 4 to this report fell into the category of “open space” and was accordingly first subject to a statutory advertisement process pursuant to Section 122(2A) Local Government Act 1972. No representations were received in response to the statutory advertisements. Consequently, the land was appropriated for planning purposes pursuant to the delegated decision of the Director of Property Services and Development, following consultation with the Director of Law and Governance, the Chief Operating Officer and the Cabinet Member for Jobs, Regeneration and Climate Change taken on 10 May 2023.
- 1.2. Following a Public Inquiry in January 2023, the CPO was confirmed by the Secretary of State on 18 April 2023.
- 1.3. Since Cabinet considered these matters in January 2022, the CCS scheme has progressed significantly with the Hill Group becoming funding and development partners for the scheme and a S73 Planning Consent (Ref: PL/2023/0002218/RVC) establishing key development parameters for the scheme, including up to 1575 new homes. As the Planning Consent establishes the proposed development parameters for the CCS scheme, it is timely for Cabinet to reconfirm the appropriation of scheme land within this updated context.

2. Options considered and recommended proposal

- 2.1. Option 1. To not update the decision regarding the appropriation of scheme land for Planning purposes
- 2.2. The appropriation of land in the context of the current Planning Consent is a technical matter to enable the scheme’s delivery and not doing so would present risk to the delivery of the scheme. This option is therefore not recommended.
- 2.3. Option 2. To approve the Recommendations set out above
- 2.4. Private third-party rights, interests and restrictive covenants
- 2.5. To the extent any rights to light, or other private rights, interests or restrictions on use of land, are interfered with or breached as a consequence of the development of the Scheme, appropriate mechanisms for overriding those rights and compensating those affected would be available as described below.

- 2.6. Given the complexity of the title to the redevelopment site, which has been assembled by the Council over a number of years from a number of different parties and is surrounded by built development, it is possible that there are third party rights and interests which burden the site, and which could restrict its development for the Scheme. The types of third-party rights potentially affected by the proposed redevelopment include rights of access and rights of way, potential unknown rights reserved in ancient deeds, rights to air and light (including prescriptive rights) and any restrictive covenants which may benefit neighbouring land. Those potential adverse private rights which have been identified are listed in Table 2 in the Schedule to the CPO (available as a Background Paper to this report), although the extent to which any individual rights will be affected by the CCS scheme and / or remain enforceable cannot be ascertained at this stage.
- 2.7. As explained below, subject to satisfaction of certain other conditions, private rights may be overridden in the case of (a) land which is acquired compulsorily or by agreement for the purposes of the CCS scheme; and (b) land which is already in the Council's ownership which has been appropriated "for planning purposes".
- 2.8. It is intended that all the land interests with the redevelopment site will either be acquired by agreement or compulsorily under planning powers (if not currently owned by the Council) or appropriated for planning purposes (if currently in the Council's ownership).
- 2.9. As explained below, there are special requirements which must be complied with in respect of any proposed appropriation of open space land before any decision on this land can be reached.
- 2.10. The following paragraphs 2.11 to 2.14 set out the powers available to the Council for the acquisition and appropriation of land for planning purposes together with the consequential powers to override existing third-party rights and restrictions over such land and the availability of compensation to affected parties.
- 2.11. Power to acquire land for planning purposes
- 2.12. The expression "planning purposes" is defined in s246(1) of the T&CPA 1990 as including land which has either been acquired under s226 or s227 of the T&CPA 1990 or has been appropriated for purposes for which land could be acquired under those sections.
- 2.13. The Council has power to acquire land under s226 (compulsorily) or s227 (by agreement):
- if the authority thinks that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land, or
 - which is required for a purpose which it is necessary to achieve in the interests of the proper planning of an area in which the land is situated.
- 2.14. Where land is proposed to be acquired to facilitate development, redevelopment or improvement in line with the above, the authority must also think that that the development etc. is likely to contribute to the promotion or improvement of the

economic, social and/or environmental well-being of its area. The considerable well-being benefits of the CCS scheme proceeding are set out in further detail in the Statement of Case which was submitted to the Secretary of State in support of the CPO (available as a Background Paper to this report). It is clear that the Council has power to acquire land by agreement for the scheme under s227 of the T&CPA 1990 as evidenced by the confirmed CPO.

2.15 Power to appropriate land for planning purposes

- 2.16 The land in the Council's ownership within the redevelopment site predominantly comprises tired and out-dated buildings that are in use for retail, food and drink and other commercial purposes, together with a small number of community uses, car parking and public roads and walkways and open space. It also includes, a ramp connecting the grade two listed Coventry Market roof top car park with the Market Way car park and a grade two listed mural. The land shown on Appendix 1 which is proposed for appropriation includes all the land in the Council's ownership which is to be redeveloped with the exception of the open space land (which is referred to be below). It includes the subsoil of the public highway land within the land shown on Appendix 1 only to the extent that it is proposed that the highway be stopped up.
- 2.17 The land proposed for appropriation for planning purposes shown on Appendix 1 was acquired by the Council from various parties over a number of years dating back to 1898, but with the majority of the land having been acquired by the Council in the 1930s and 1960s. So far as can be ascertained, the various parcels of land were originally acquired for a range of statutory purposes including general land holding powers, street works and redevelopment. At the date of the 11 January 2022 Cabinet report, the statutory powers under which all the land is currently could not be fully identified. However, none of the land was known to be held for housing, school or other purposes to which special or additional powers of appropriation would apply. (As noted, the open space land to which special provisions apply is excluded from the land shown on Appendix 1, as are areas of land which will continue to form part of the public highway.)
- 2.18 Following the Cabinet's decision on 11 January 2022, the land shown on the plan at Appendix 3 is held by the Council for planning purposes. The effect of the appropriation decision recommended in this report would be to re-affirm the appropriation for planning purposes in respect of the current redevelopment proposals in respect of the land shown shaded grey on the plan at Appendix 1. Practice and case law indicate that there is nothing to prevent a local authority "re-appropriating" its land for a different planning purpose. It is considered that the general power of appropriation under s122 LGA 1972 applies to the Council land within the redevelopment site shown on Appendix 1.
- 2.19 In relation to the power to appropriate land under s122 of the LGA 1972 there are two basic statutory requirements:
- the land is no longer required for the purpose for which it is held immediately before the appropriation; and
 - the Council would (in principle) have power to acquire land by agreement for the "new" purpose.

- 2.20 In respect of the first of the above requirements, the Council must give specific consideration to the question of whether the land proposed for appropriation (as shown in Appendix 1 to the report) continues to be required for its existing purposes and in doing so, it must consider the comparative needs in the public interest for the existing use and the proposed new use. If the Council is satisfied that there is a greater need in the local public interest for the scheme as opposed to the current uses of the land that condition would be satisfied.
- 2.21 In respect of the second requirement, as explained above, it is clear that the Council would (if it did not already own the land) have power to acquire the land shown in Appendix 1 for planning purposes by agreement under s227 of the T&CPA 1990 in order to facilitate the CCS scheme. Both requirements are considered to be satisfied with respect to the Council's interests in that part of the site shown on the plan at Appendix 1.
- 2.22 In addition to the specific requirements of section 122, case law indicates that where third parties are known to have rights which may be affected by the appropriation, a local authority should not use its powers unless it has good reason to believe that the interference with their rights is necessary. The Human Rights implications of the proposals are referred to in section 6.4 below.
- 2.23 Power to override easements and other rights
- 2.24 Section 203 of the H&PA 2016 authorises development even if it involves infringing certain third-party rights, subject to payment of compensation. The kinds of rights that can be overridden under s203 comprise:
- a "relevant right or interest" i.e., "any easement, liberty, privilege, right or advantage annexed to land and adversely affecting other land (including any natural right to support)"; and
 - a restriction as to the user of land arising by virtue of a contract.
- 2.25 The first category above would include easements and other rights which burden the development site and benefit other land. The second category would include restrictive covenants.
- 2.26 In the case of a site of the size and complexity of that needed for the CCS scheme which has been in various ownerships and developed over a number of years it is possible that such third-party rights may exist, albeit that there may be doubts as to the enforceability of certain ancient rights and covenants.
- 2.27 Certain third-party rights cannot be overridden under s203, in particular "protected rights" of statutory undertakers and electronic communication code operators. In addition, rights and interests which benefit the Crown and its land, or rights enjoyed by the public, could not be overridden under s203.
- 2.28 The application of section 203 is dependent on satisfaction of certain conditions (the amendments made to the conditions by the Environment Act 2021 are not relevant for present purposes and are not referred to below.) The four conditions for the application of s203 as they apply to the Council are, in summary:

- 2.29 Planning permission: there must be planning permission for the building or maintenance works and/or the use that causes the interference with or breach of the third-party rights.
- 2.30 Subject land: the building or maintenance works and/or the use that causes the infringement/breach must be undertaken on land that at any time:
- before 13 July 2016 was acquired or has been appropriated by the Council for planning purposes (as defined in s246 T&CPA 1990);
 - on or after 13 July 2016 has been:
 - appropriated by the Council for planning purposes or
 - acquired by the Council for a purpose for which a power to acquire land compulsorily exists.
- 2.31 Compulsory acquisition: the Council could (in theory) have acquired the land compulsorily for the purposes of the building or maintenance work and/or use. The explanatory notes to the H&PA 2016 refer to this requirement as involving the need for the authority to have an appropriate compulsory purchase enabling power.
- 2.32 Purpose of acquisition or appropriation: the purpose of the building or maintenance work and/or use must be related to the purpose for which the land was acquired or appropriated.
- 2.33 Provided the four criteria for the application of s203 are met, it is irrelevant who carries out the development.
- 2.34 Consequently, if land needed for the CCS scheme is acquired under planning powers and the Council resolves to appropriate the land already in its ownership for planning purposes all the conditions for the application of s203 will be satisfied:
- a) planning permission – planning permission for the CCS scheme has been granted;
 - b) subject land – the development would be undertaken on land acquired by the Council after 13 July 2016 or appropriated by it for planning purposes;
 - c) compulsory purchase enabling power – the Council has the power to acquire land compulsorily for the scheme (under s226 T&CPA 1990); and
 - d) purpose of acquisition or appropriation – it is clear that the CCS scheme development is related to the purposes for which land for that scheme is proposed to be acquired or appropriated as recommended in this report.
- 2.35 Appropriation of Open Space Land Held by the Council
- 2.36 In relation to land identified as potential open space (Appendix 2 to the report), the requirements of s122(2A) of the LGA 1972 and s233(4) T&CPA 1990 apply. Those provisions require notice to be given of any intended appropriation of open space land in two consecutive weeks of a local newspaper and any representations must be

considered before any decision is reached. It is proposed that officers be given delegated authority to advertise the Council's intention to appropriate the open space land it owns within the redevelopment site for planning purposes and to dispose of it and to consider any objections before deciding whether or not to appropriate and dispose of this land.

2.37 Compensation for affected third parties

2.38 Where s203 applies, when development is carried out, any person who suffers loss in terms of a reduction in the value of their land on account of an infringement of their rights would be entitled to claim statutory compensation under s204 of the H&PA 2016 from the person who carries out the development. If the developer does not pay the compensation, the Council must do so, but has a statutory right to recover any payment from the developer.

2.39 Compensation under s204 is calculated on the same basis as compensation payable under s7 and s10 of the Compulsory Purchase Act 1965. It is generally based on the reduction in the value of the claimant's land (rather than any "ransom value") and is sometimes calculated on a "before and after" assessment of what their land was worth before and after the infringement.

2.40 At this stage it is not possible to assess whether any valid claims under s204 will be made or the extent of any liability for compensation, but a reasonable allowance has been included within the overall budget to cover this potential liability.

3. Results of consultation undertaken

3.1 The CCS scheme has been the subject of a number of different public consultation processes throughout its evolution. More recently these include:

(a) public consultation undertaken between 2020 and 2022 ahead of, and as part of, the determination of the 2022 outline planning permission for the CCS scheme (reference OUT/2020/2876)

(b) publicity undertaken in 2022 regarding the making and confirmation of the CPO including statutory notices served on those directly affected by the CPO together with press and site notices

(c) public consultation undertaken between 2022 and 2023 ahead of, and as part of determining, the application made pursuant to section 73 of the Town and Country Planning Act 1990 to amend conditions attached to planning permission OUT/2020/2876 (resulting in the grant of a fresh hybrid planning permission for the CCS scheme under reference S73/2022/2876)

(d) public consultation undertaken as part of the most recent application pursuant to section 73 of the 1990 Act to amend conditions attached to planning permission S73/2022/2876 together with proposals for the detailed design of Phase 1 of the scheme. This most recent consultation on the CCS scheme has included a consultation event in the Coventry Telegraph which was widely publicised via postal invitations, social media and posters in the City centre. The most recent exhibition of

the CCS Phase 1 proposals took place on Wednesday 29 March and Saturday 01 April 2023 and was attended by 448 people with 93 respondents providing feedback on the emerging CCS Phase 1 RMA design. The main topics raised during public consultation related to the principle of redeveloping the area and the designs shown. The majority of consultation respondents felt positively about the concept for the proposals and were supportive of the redevelopment of the site. Supportive comments were also made about the proposed landscaping approach and new green spaces as well as the site layout.

- 3.2 There has been, and will be, further engagement in relation to the Scheme refinements as part of the evolution of the scheme in planning terms, including the reserved matters applications.

4. Timetable for implementing this decision

- 4.1. If the Recommendations that are the subject of this report are approved, then they will be implemented straightaway.

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

5.1. Financial Implications

5.1.1 Land that is appropriated could give rise to compensation if a person suffers a loss as a result of the process set out in paragraphs 2.37 - 2.40 above. Any compensation due is calculated on the same basis as compensation payable under the Compulsory Purchase Act 1965 and an allowance for these costs has been built into the Land Acquisitions budget of the existing WMCA capital grant. The element of this grant associated with Land Assembly is capped at £28m. This spend was added to the Capital programme following appointment of Shearer Property Group as developer in 2016.

5.1.2 To date, the Council has acquired assets to the value of £12.8m by way of negotiation and private treaty, funded by the £28m grant referred to in 5.1.1. Deloitte, the Council's CPO advisors, has estimated that the cost of acquiring the remainder of the land and property interests, including any relocation or compensation costs such as those associated with the recommendations of this report will be around £9.5m, giving a total estimated cost of land acquisition of £22.3m.

5.2. Legal Implications

5.2.1 The Council has power under section 122 of the Local Government Act 1972 (LGA 1972) to appropriate land belonging to the Council that is no longer required for the purpose for which it was held immediately before the appropriation (section 122(1)), provided that the new purpose is one for which the Council would be authorised to acquire land by agreement.

5.2.2 In respect of land which is acquired by the Council by agreement for the purposes of the Scheme, the Council has power under section 227 of the Town and Country Planning Act 1990 for equivalent purposes to those referred to above in connection with section 226 of the 1990 Act and subject to the same proviso regarding well-being objectives.

5.2.3 Other relevant statutory provisions, including ss 203 and 204 of the Housing and Planning Act (authorising certain private third-party rights to be overridden) and the powers to appropriate land for planning purposes, are referred to in the body of this report.

5.2.4 The Council must act in accordance with the rights under the European Convention on Human Rights, and this includes Article 1 of the First Protocol (right to peaceful enjoyment of possessions) and Article 8 (right to respect for private life, family and home). The Council must strike a fair balance between the public interest and the individual's rights and consider whether the interference is "proportionate". In view of the factors described in this report it is considered that it is necessary to appropriate the land for planning purposes and that there is a compelling case in the public interest to support the decision to do so.

5.2.5 Appropriation will allow the Council to commence development works, notwithstanding the interference with the rights of third parties affected by the development. Therefore, if appropriation has not taken place when the Council commences works it would potentially be infringing those affected parties' rights to light. The remedy for such an infringement is an injunction. It is an equitable remedy and is within the court's discretion to grant. The court can award damages where it considers this an adequate remedy. If the adjoining owners choose to institute proceedings for an actionable injury the court might also grant an injunction pending the court's decision on whether there has been an infringement of their rights or not. The consequences of this for the Council will be to set back commencement of the development and delivery of the scheme.

5.2.6 Further to the above and specifically with regards to 'special categories of land', a local authority can appropriate and thereafter dispose of land consisting or forming part of land considered 'open space' under section 122(2A) of the LGA 1972. 'Open space' is defined in section 336(1) of the TCPA 1990 as any land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.

5.2.7 However, before appropriating or disposing of open space land, a local authority must (in accordance with (Section 122(2A), LGA 1972):

- a) Advertise its intention to appropriate and thereafter dispose of open space land for two consecutive weeks in a newspaper circulating in the local area.
- b) Consider any representations to the proposed appropriation or disposals – such representations must be considered, but it does not mean that they will prevent the scheme from proceeding.

6. Other implications

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

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

6.1.1 The delivery of the proposal outlined in this report will help deliver a range of housing, economic development, regeneration and wellbeing objectives that will help to realise the Council's strategic ambitions for a more vibrant and economically prosperous city.

6.2. How is risk being managed?

6.2.1 The Council is being supported by an expert professional team to support the land assembly, CPO and Appropriation processes for CCS. This includes: Land Referencing Services (LRS), who are undertaking the necessary land referencing work to ensure a fully accurate position regarding property ownership; Deloitte, who are undertaking the role of CPO surveyors and are negotiating with key strategic property owners to secure their interest through negotiation; and Pinsent Masons, who are providing expert legal advice on all aspects of the CPO process.

6.3. What is the impact on the organisation?

6.3.1 N/A.

6.4. Equalities / EIA?

6.4.1 Section 149 of the Equality Act 2010 requires the Council in the exercise of its functions to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and other form of conduct prohibited under the act; and
- advance equality of opportunity and to foster good relations between persons who share a relevant protected characteristic (age, disability, gender re-assignment, pregnancy and maternity, race, religion and belief, sex, and sexual orientation) and persons who do not share it.

6.4.2 Having regard to the need to advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it involves having due regard in particular, to the need to:

- remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- take steps to meet the needs of the persons who share that characteristic that are different from the needs of persons who do not share it;
- encourage persons of the relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

6.4.3 An EqlA in relation to the land assembly and CPO elements of the Scheme was prepared and considered by Cabinet on 11th January 2022 and updated in March 2022. Equalities impacts were reviewed again at the time of grant of planning permission PL/2023/0002218/RVC (December 2023). The EqlA is an iterative and live document and is reviewed on a regular basis. No new impacts to those set out above have been identified.

6.5 Human Rights

6.5.1 Section 6 of the Human Rights Act 1998 prohibits a public authority from acting in a way which is incompatible with the rights and fundamental freedoms set out in specified provisions of the European Convention on Human Rights ("Convention Rights").

6.5.2 Convention Rights likely to be engaged as a result of the appropriation of land pursuant to section 122 of the Local Government Act 1972 and the resulting application of section 203 and 204 of the Housing and Planning Act 2016 include those under Article 6 (right to a fair and public hearing to determine a person's civil rights), Article 1 of the First Protocol (right to peaceful enjoyment of possessions) and Article 8 (right to respect for private and family life including a person's home. In addition, in effect, Article 14 prohibits discrimination, on any grounds, in the way public authorities secure enjoyment of the rights protected by the European Convention on Human Rights.

6.5.3 Any interference with a Convention Right must be necessary and proportionate. Overriding private rights must be justified by sufficiently compelling reasons in the public interest and must be a proportionate means of achieving the Council's objectives. As set out in this report, third parties whose rights may be overridden by s203 of the Housing and Planning Act 2016 include owners and tenants, including occupational tenants, of the CCS site and owners of neighbouring properties with the benefit of rights over the site.

6.5.4 It is considered that the principles of case law and the CPO Guidance in relation to the need to demonstrate a compelling case in the public interest which were required to justify the confirmation of the CPO satisfy the requirements of proportionality and fair balance in relation to interference with human rights. For the reasons set out in the Statement of Case for the CPO (available as a Background Paper to this report) it is considered that there is a compelling case for the appropriation of land required to facilitate the Scheme.

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

6.6.1 The overall development will be in accordance with the Council's planning policies for sustainable development.

6.7 Implications for partner organisations?

6.7.1 There are implications for the Council's development partner for the Scheme, SPRL, that will result from the Decisions that are the subject of this report.

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