

Appendix 3b – Consultation Responses

I am Inspector 20634 Maria Perrin of the West Midlands Police, currently stationed at Coventry Central Police Station. I am the neighbourhood sector Inspector responsible for St Michaels ward.

The PSPO's are an important part of this framework that gives partners the ability to challenge behaviour that is not necessarily covered by other laws.

The City Centre PSPO that is due for renewal has a very important element for police and can provide an additional tactical power to arrest a person in breach of the order.

The changes suggested are relevant to the anti-social behaviour experienced in the city, including aggressive begging, the use of amplification equipment used by individuals in some cases to cause harassment, alarm and distress to others. Enforcement of e-bikes remains vital to ensuring the safety of visitors into the City and effective use of the PSPO will help tackle a key issue raised by communities in Coventry.

West Midlands Police see the value to community safety within this PSPO renewal and fully support this process.

Thank you

My name is (Redacted) and I own Battery Connection which is a business based close to the Precinct Fountain. I have been based here for 29 years.

My business depends on the City Centre being somewhere people choose to visit and they will not do so if the City Centre is not an inviting, enjoyable place to visit. I need to be able to have a normal discussion with my customers without the need for either of us to shout over the various buskers or preachers loud speakers.

Over the years I have definitely noticed a difference in the City Centre. Whilst the pandemic had an effect on all Cities there are aspects of Coventry City Centre that need addressing.

Any proposal to bring in measures or controls don't mean very much if there are not enough officers to enforce it. I have been very disappointed with the frequency and visibility of officers in the City Centre. This needs to be addressed.

Since Birmingham City Centre brought in their amplification ban there has been a marked change in Coventry. There is no doubt there has been an influx of singers, preachers and others that rely on amplification & can be heard up to 50M-60M away.

The lack of officers enforcing and people putting up their own volumes to counter others mean there have been many times I have struggled to hear customers, and it has been damaging to my business & annoying to everyone.

At weekends the area around the fountain is very busy with various religious groups that all seem to have their own gazebos, desks & loudspeakers set up. This makes the area very

crowded and causes some people to avoid the area because they don't want to be bothered by the groups or they find it hard to get past as the walkway is obstructed.

If I wanted to set up a gazebo or desk next to my business, I would quickly be stopped or charged a significant sum. These groups appear to do just what they want totally unchallenged.

As mentioned, I feel it needs to be stressed that any proposed measures need to have sufficient officers to ensure the rules are kept, but I do support the new proposals to ban amplification and temporary structures such as gazebos in the City Centre.



Councillor John McNicholas,
Cabinet Member for Community Safety and Cohesion
Coventry City Council,
Council House,
Earl Street,
Coventry,
CV1 5RR.

Dear Councillor McNicholas,

Public Space Protection Order - City Centre 2026

I am writing on behalf of Coventry Trade Union Council (CTUC) regarding the current round of consultation on the renewal of the Public Spaces Protection Order (PSPO) for the City Centre.

I am aware that the City Council are inviting comments on the PSPO City Centre via its community consultation survey.

However, at the recent CTUC delegate's meeting it was agreed that a letter would be sent to you expressing our concern about two aspects of the changes proposed in the PSPO for the city centre.

This is related to the new rule restricting the use of loudspeakers, microphones, megaphones and other amplification equipment and the new rule restricting temporary structures such as gazebos, stalls, canopies and display stands. CTUC understands these will only be permitted if written permission has been given by the Council.

The trades council believes it fully understood and sympathises with the reasons for these change. In particular, members recognised that some use of public address equipment causes discomfort and annoyance. Shop workers and others have explained that the incessant use of such equipment for prolonged periods of time proves both an irritant and a nuisance. It affects working conditions and discourages people to visit the city centre.

However, organisations like our own and other trade union and campaigning organisations make use of such equipment and stalls on an occasional basis to promote democratic activities and education. This includes issues related to civil liberties and community concerns.

Coventry has a long tradition of supporting democratic expression and our fear is that this long established right will be curtailed or even prevented. We are sure this is not the City Council's intention.

Therefore, we resolved to request the City Council revises the proposed new rules to exclude occasional and time limited political activities in the interests of local democracy.

While recognising the importance of creating a comfortable and pleasant city centre, we are calling upon the City Council to take account of democratic activities and civil liberty related events which rarely, if ever, create the kind of environment the PSPO aims to prevent.

We would welcome your support on this matter and look forward to the City Council taking such activity into account when considering and passing its PSPO in 2026.

Thanking you in anticipation.

Yours sincerely.

In solidarity

Phil Street - Secretary- Coventry Trade Union Council

Coventry BID support the PSPO for Renewal

Coventry BID supports the renewal of the Public Spaces Protection Order (PSPO) for Coventry City Centre.

We work closely with businesses across the city centre, and anti-social behaviour continues to be one of their biggest concerns. While education and engagement are always the first approach, they do not work in every situation. There are times when officers need the legal powers to deal with people whose behaviour continues to cause problems for businesses, staff, visitors and other members of the public.

The PSPO gives officers the ability to deal with issues such as aggressive begging, dangerous cycling and the misuse of e-bikes and e-scooters, unauthorised structures and behaviour that causes harassment, alarm or distress. Without these powers, it is much harder to deal with repeat offenders and protect the city centre.

The BID supports the Council's approach of using education and engagement first, with enforcement only when it is necessary. Having these powers available gives officers another option when other methods have not been successful.

We believe renewing the PSPO will help keep Coventry city centre a safer and more welcoming place for businesses, workers, residents and visitors.

Kind Regards

Joanne Glover

Chief Executive

Coventry BID Limited
Holt Court (Rear) First Floor
16 Warwick Row
Coventry CV1 1EJ

Good afternoon,

I am writing in relation to the open consultation on renewing and updating the Coventry City Centre Public Spaces Protection Order (PSPO).

Guide Dogs welcomes steps to tackle illegal and antisocial e-scooter riding, including pavement riding. E-scooters operate silently, making it impossible for a person with sight loss to identify and avoid them.

A collision between an e-scooter rider and a pedestrian has the potential to cause serious injury to both parties. Even a near miss with an e-scooter can rob a person with sight loss of the confidence to go out independently.

Because e-scooters are unregulated, the models on our streets can be extremely powerful and fast. This is a particular concern in areas where pedestrians and e-scooter riders share space. We welcome steps to police and prevent antisocial e-scooter riding, including steps to reduce potential collisions. While it is positive to ensure that e-scooter riders dismount in the City Centre, the use of privately owned e-scooters on public land remains illegal and we would encourage Coventry City Council to work closely with West Midlands Police and call for stronger police enforcement against antisocial e-scooter riding.

Kindest regards

Jessica Luke

Policy and Campaigns Manager (Midlands and East)
Guide Dogs

This is a response from Hillfields Church Coventry to the consultation by Coventry City Council for the renewal and amendments to the Public Spaces Protection Order (PSPO) covering Coventry city centre.

Hillfields Church Coventry has served the people of Coventry for over 150 years. We are based in the Hillfields area close to the city centre with church buildings in Lower Ford Street (since 1857) and in Waterloo Street. We are actively involved in spreading the good news of Jesus Christ and in serving people of all faiths and of none.

We have an interest in the proposed revisions to the PSPO in the city centre because we have people who participate in city centre outreach. Sometimes this involves giving out leaflets and having conversations, sometimes street preaching too, sometimes the distribution of New Testaments (for example, when welcoming new students to the city). We do not do any fundraising in the city centre and we do not sign people up for anything involving fundraising.

We agree with the apparent intentions of the proposed PSPO which are to improve the experience of everyone who uses or works within the city centre. As a church, we certainly represent far more people visiting the city centre for shopping or recreation or work than visiting to engage in outreach. However, we believe that some of the proposed restrictions are unnecessary and will have a detrimental rather than a beneficial effect.

We have no feedback to offer on the changes intended to avoid criminalising homeless people.

We have no feedback to offer on the proposed changes in respect of bikes, skateboards and scooters.

We do not use voice or music amplification and we can see the benefits of the proposed restrictions to amplification so far as it does not restrict freedom of speech.

We believe that spreading the ideas and message of Christianity is a great blessing to the people of our city. We think that these activities should face less restriction than commercial activities or charity fundraising or begging or performing / busking. We would want this lesser restriction to include the free spreading of religious or political ideas that we disagree with. We believe that the promotion of free speech, by the Council, will lead to a happier and healthier society. We have commented further in our appendix, below.

We believe that the proposed restriction on structures is excessive and overly bureaucratic. We believe that outreach using suitable small structures (such as a table or preaching board or sketching board) can create an enhanced experience for the public for the following reasons. Having a structure tends to make the group more readily recognised, allowing people who are interested to be drawn towards us. Having a structure encourages a group to give more thought to where they stand (avoiding inconvenience to others) rather than wandering around. Having a structure enhances accountability, as the group are likely to be identifiable. If a size limit is necessary, then we would be content with a footprint of 1.5 metres by 1.2 metres. We have made additional comments in our appendix, below.

We believe that some of the wording in the proposed PSPO is ambiguous, leading to uncertainty about its intended meaning. This should be corrected in such a way as to encourage these positive activities in our city centre. We have explained the difficulty in our appendix, below.

If you have any questions about this matter, please feel free to contact us

Yours sincerely,

Hillfields Church Coventry

Appendix

The Council's proposed text includes as follows.

A. Engaging in any conduct that amounts to aggressive, pressuring, or harassing requests for money or donations

No person shall engage in behaviour within the Restricted Area that causes, or is likely to

cause, harassment, alarm, or distress to any other person. Without limiting the above, such behaviour includes but is not limited to the following examples:

- (i) Persistent following of a person after a refusal of a request
- (ii) Intentionally obstructing a person's path
- (iii) Using threatening, abusive, offensive or intimidating language or behaviour
- (iv) Accosting a person in a manner that impedes their movement
- (v) Continuing to make a request for money or goods after being clearly asked to stop

Exemption:

For the avoidance of doubt, this prohibition does not apply to merely sitting, standing, or being present in the Restricted Area, nor to passively request assistance, where no harmful behaviour occurs.

This Section A of the proposed text seems confused and/or misleading in that the title refers to fundraising or commercial activity or begging whereas the text seems like it could be applied much more widely. It is also drafted poorly leading to ambiguity. For example, if I step towards someone and pleasantly offer them a leaflet, could I be accused of "obstructing a person's path" or "impeding their movement"? **We would be happy if it were made clear that the scope is limited to commercial or fundraising activities or begging.**

The Council's proposed text includes as follows.

C. Temporary structures

Within the area shown as the City Centre Restricted Area on the enclosed map, a person must not, unless authorised by Coventry City Council, erect, place or maintain any temporary structure unless authorised by Coventry City Council.

For the purposes of this prohibition, a temporary structure includes but is not limited to:

- (i) gazebos
 - (ii) canopies
 - (iii) stalls
 - (iv) display stands
 - (v) or any similar structure designed to facilitate trading, promotion or gathering.
- Any person directed by an authorised officer to remove a temporary structure must comply with that request. Failure to comply will leave them liable to enforcement.

Exemption:

This prohibition does not apply where written authorisation has been granted by Coventry

City Council. Authorisation may include (but is not limited to):

- (i) organised events
- (ii) authorised markets
- (iii) council-approved promotional activity
- (iv) permitted demonstrations or gatherings
- (v) activities authorised by the local authority.

This Section C of the proposed text seems excessively restrictive in banning all structures (or unnecessarily bureaucratic if repeated applications must be made and processed). No account is taken of the benefits of having a small structure (see main text, above). Your Equality Impact Assessment refers to "outsized tables that can obstruct pedestrians, wheelchair users and similar". It also refers to "The removal of items such as gazebos and large tables...". There is no justification given for the prohibition of small tables, preaching boards or sketching boards.

These have been used extensively, across the UK, over many years without causing a detriment to the safe enjoyment of city centres. **If there is a need to exclude larger structures then it should be limited to structures with a footprint larger than 1.5 metres x 1.2 metres.**

D. Buskers and Street Performers

Any person is prohibited from performing contrary to the 'Coventry City Centre Code of Conduct for Performers' (see Appendix 2).

It should be made clear that our outreach (with no products for sale and no fundraising) are not considered to be “performing”.

The Council's Equality Impact Assessment records “NI” for No Impact under religion. If our concerns are addressed then this would seem correct. If our concerns are not addressed there will be a detrimental impact on the small minority of people who are active in sharing their Christian faith in the city centre.

END

Coventry City Centre PSPO - Proposed Renewal and Changes 2026

Response from the Campaign for Freedom in Everyday Life

The Campaign for Freedom in Everyday Life (formerly the Manifesto Club) has worked for over a decade on PSPOs and other anti-social behaviour powers, with a particular concern for their effect on ordinary public life:

campaigners, street performers, people who beg, and religious and political groups.

We have one point of support and four of concern.

1. We welcome the refocusing of the begging provision onto aggressive behaviour.

Limiting the restriction to conduct that is genuinely aggressive or pressurising - following someone after a refusal, obstructing their path, persisting after being asked to stop - and expressly exempting people who are

merely sitting, standing or passively asking for help, is the right approach. Placing that exemption on the face of the order, rather than leaving it to enforcement discretion, is good practice, and we welcome it. This

is also consistent with the statutory guidance and the Act itself, under which a restriction may only address activities that have a detrimental effect on quality of life and are both persistent and unreasonable, a test that

a quiet request for money does not meet.

We would raise one drafting point. The second part of this provision, behaviour "likely to cause harassment, alarm or distress" with "offensive... language" given as an example, is considerably wider than aggressive

begging, and risks catching speech that merely offends a listener. This could mean that it is illegal for a homeless person to swear, or the fact that they have offended someone means that they can no longer engage in

non-intrusive begging. We would encourage the Council to anchor the provision to genuine aggression and intimidation, and to drop "offensive" as a threshold, which is vague and has proved difficult to enforce fairly

wherever it has been adopted.

2. We strongly oppose the requirement of Council authorisation for amplification.

As drafted, no one may use a loudspeaker, microphone or megaphone in the city centre unless the Council has given written authorisation, and the categories listed for authorisation are all Council-organised or

Council-approved activity (organised events, authorised performances, council-approved promotional activity). There is no exemption for a lone campaigner, street preacher or trade unionist who wishes to address the

public. The practical effect is that the Council decides who may be heard in Coventry city centre.

That is a serious interference with free expression, and it is not what this power is for (indeed, the legislation requires

consideration of convention rights for free expression before drafting of any PSPO).

We have seen this order play out in Leicester, whose city-centre PSPO contains an almost identical requirement of prior authorisation for amplification and stalls. In practice, campaigners found they were unable to

obtain permission, dozens of religious groups were issued warning notices, and the order operated as an effective ban on political and religious speech in the centre. We wrote to the Mayor of Leicester to say that the

order was drawn so widely as to restrict ordinary democratic campaigning, and campaigners there are now considering a legal challenge on human rights grounds. Coventry should not adopt the same model. If there is

a genuine problem with excessive volume, it should be met with a targeted noise-nuisance provision, not a prior-permission regime covering all amplified speech.

3. We strongly oppose the requirement of Council authorisation for stalls and temporary structures.

The same objection applies, and here it is most acute, because the low-key street stall is the basic equipment of democratic campaigning: the table provides a place to put a petition, literature or a banner. One

Leicester campaigner said that campaigning without a stall would be like "campaigning with one hand tied behind my back". The provision as drafted catches "any similar structure designed to facilitate trading,

promotion or gathering", which plainly includes campaign tables, and the only route to lawful use is Council authorisation. Even the exemption for "permitted demonstrations or gatherings" still requires them to be

permitted. Requiring prior permission means that only those the Council has approved may campaign in the city centre, and it hands officers discretion over which causes appear on the streets, which includes the

possibility for bias given that some of these causes may be critical of the Council itself. Leicester shows what this means in practice. A pensioner there was fined £100 for putting up an "unauthorised" campaign table against council cuts; she refused to pay, and she had so much public support that the Council was forced to back down and decline to prosecute. This is the predictable result of an authorisation regime, and it carries real legal risk: using a PSPO to require permission for tables, flags and banners engages the rights to free expression and assembly under Articles 10 and 11 of the European Convention on Human Rights.

4. We object to the legal enforcement of the buskers' performance code.

We object to making the buskers' performance code a legal obligation. Good will between buskers and the council is better maintained with informal codes, which suggest reasonable modes of performance, but

without the threats of sanctions and criminal records or fines. The current wording means that in theory a busker would be guilty of an offence if they played a set for 95 minutes, or if their music could be heard 51

meters away. The elements in the busking code are better acting as guides for thoughtful conduct rather than as criminal lines in the sand.

In addition, the draft prohibits performing contrary to the Council's Code of Conduct for Performers. That code still requires every busker to "undertake a risk assessment of your performance to ensure it does not

encourage the spread of coronavirus." This is a leftover from the pandemic and is now plainly out of date. The effect is that a street performer who has not carried out a coronavirus risk assessment of their act would be

committing a criminal offence, liable to a fixed penalty notice. That is an absurd result, and it shows the danger of creating a criminal prohibition by cross-reference to a separate document that has not been kept current.

5. We oppose the power to require cyclists and skateboarders to dismount on an officer's judgment.

The draft requires anyone cycling, skateboarding or riding a manual scooter to dismount if an authorised officer asks them to, where the officer judges that continuing "would cause a danger to the public or cause

harassment, alarm or distress", with failure to comply exposing them to enforcement. This makes a criminal matter turn entirely on the on-the-spot judgment of a single officer, against no defined standard and with no independent check. Someone riding carefully and considerately, which the same clause requires of them, could still be ordered to stop simply because an officer forms the view that they might cause alarm, and they commit an offence if they disagree. This places too much discretion in one person's hands, and it invites arbitrary and inconsistent enforcement. If cycling is genuinely causing danger in particular areas, the order

should identify those areas and that conduct precisely, rather than leaving it to officers to decide case by case.

A constructive alternative to amplification/table stalls elements.

We would urge the Council not to adopt an outright authorisation model, but to treat public campaigning as a free-speech right subject only to genuine limits of obstruction, safety and noise nuisance. We have published detailed guidance for councils on how to do this: allowing stalls, leafleting, banners and campaign tables as of right, without prior application or fee, provided they do not block pedestrian flow and keep noise reasonable; no fees for political or religious stalls; and no vetting of the content of literature.

A number of councils already take this approach - Birmingham, for example, states that protests, vigils and political campaigning do not need the Local Authority's permission. The guidance is here, and we would be glad to discuss it with the Council: <https://freedomineverydaylife.org/guidance-for-councils-how-to-keep-your-publicsquares-open/>

We would welcome the opportunity to discuss any of these points.

Yours faithfully,

Josie Appleton

Director, Campaign for Freedom in Everyday Life

Created by: **Clarke, Andrew**

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Details 27/07/2026, I Spoke to Stephen Brown from the Musicians Union in response to his email. On behalf of the MU, SB understands that there can be some annoyance from buskers, particularly uncooperative ones. The MU has a code of practice for Buskers that many of their professional buskers sign up to. SB is concerned primarily with the amplification ban as it has restricted busking in many other locations where a PSPO is in place. SB was pleased to hear that we are looking into an approvals scheme and has some suggestions that he would like us to consider. I have advised that we are certainly looking into this and are actively seeking to allow continued busking, just balancing it with it's impacts, so we would be very grateful to hear any suggestions that he may have. SB will submit these via email and I have provided my direct email address and asked him to email both me and the CS address.

**Re Consultation on the Proposed Renewal of the Public Spaces Protection (PSPO) –
Coventry City Centre**

Dear Sir/Madam,

Thank you for your letter of 29 June 2026 to The Christian Institute, inviting us to contribute towards your PSPO consultation. We are very pleased to be asked, given our concern about the potential impact of such matters on responsible street evangelism.

I believe you may be aware of The Christian Institute's [Street Preacher's Charter](#) which seeks to help both street preachers and the authorities to understand the complex laws surrounding free speech in the public square. The Foreword to the Charter was written by Lord Macdonald of River Glaven KC, former Director for Public Prosecutions, who is also currently conducting a review of public order legislation on behalf of the Home Secretary.

In order to familiarise ourselves with issues you face in central Coventry, we researched online videos and articles regarding conduct within your city centre. We also sought Open Air Mission's ("OAM") thoughts on the current situation. OAM are a responsible Christian evangelistic charity who have peacefully operated for six years in central Coventry. We have sympathy with your efforts to reduce noise levels and create order within the city centre. We would be grateful if you could consider the following constructive comments.

Part A – anti-social conduct relating to requests for money

This part states

"No person shall engage in behaviour within the Restricted Area that causes, or is likely to cause, harassment, alarm, or distress to any other person...such behaviour includes but is not limited to...(iii) Using threatening, abusive, offensive or intimidating language or behaviour".

[underlining added]

Whilst we assume that behaviour caught within part A relates solely to persons making monetary requests, it would be helpful to make this clear in the text of the prohibition (and not just in the title). For example, a [BBC article](#) on 17 June 2026 reported that Coventry council "wants to renew the order and make changes to tackle any behaviour that causes harassment, alarm or distress" [underlining added]. As the BBC have not picked up that Section A relates to monetary requests, it stands to reason that others may also fail to do so.

[Section 4A](#) of The Public Order Act 1986 states "A person is guilty of an offence if, with intent to cause a person harassment, alarm or distress, he (a) uses threatening, abusive or insulting words or behaviour, or disorderly behaviour...thereby causing that or another person harassment, alarm or distress". [Section 5](#), which is designed to be a less serious offence, states "A person is guilty of an offence if he (a) uses threatening or abusive words or behaviour, or

disorderly behaviour...within the hearing or sight of a person likely to be caused harassment, alarm or distress thereby". I mention this because both offences clearly have a robust threshold. It is not sufficient under either offence that the behaviour causes or is likely to cause harassment, alarm or distress. More is required, including intention. However, the proposed wording of part A requires nothing more than that the behaviour causes or is likely to cause harassment, alarm or distress. What follows is simply a list of behaviours which may constitute harassment, alarm or distress. A mere prohibition not to cause alarm, for example, is highly unlikely to be compliant with the free speech requirements of Article 10 ECHR.

More worryingly, if part A of the draft PSPO makes 'offensive' language (see limb (iii)) an offence, it sets the bar for offending even *lower* than Section 4A and 5 of the Public Order Act. That is concerning because both UK law and the judgments of the European Court of Human Rights are clear that there is no right merely not to be 'offended'. Consequently, if Section A of the PSPO was misapplied to *general* conduct and behaviour within Coventry city centre, people could incorrectly believe that they had a right not to be offended. This would not align with the law regarding freedom of expression.

Obviously, our concerns in these respects falls away if part A makes clear that the prohibition relates only to conduct making requests for money or donations.

Part C – Temporary structures

We concur with your wish to ensure the city centre is orderly and tidy by preventing the proliferation of larger items such as gazebos and stalls. However, a blanket ban could cause unintended consequences for legitimate activities carried out by charities or churches. We appreciate the need for consistency in approach and with this in mind, we wondered if you could avoid the pitfall of challenges over what you do and don't allow by setting a simple *de minimis* size limit. If set at the right level, it will permit legitimate small scale activity (where authorisation would not be required), but restrict anything over the limit.

Our preference would be that size limits are published within the PSPO, perhaps with a requirement that public liability insurance is held. But if this is unacceptable, we wondered if the council could hold a separate policy document indicating the measurements/criteria for when authorisation will not be unreasonably refused (subject to public liability insurance etc.)

OAM – which has been operating on the streets in towns and cities across the UK for 170 years - has operated peacefully in central Coventry without the use of amplification for many years. They do this by using a non-intrusive [display board](#) with a height of 1.95m and width of 1m. They also use a small folding table. OAM has public liability insurance and conduct risk assessments on their equipment. Given the longstanding nature and orderly conduct of OAM's activity, we would ask that consideration is given to their needs. The display board is vital to the work they

do and its footprint is no larger than a buskers musical case for collecting coins - something not debarred under the PSPO. Needing to get authorisation for such a small board/table in every town and city across the country would be a huge administrative burden for this charity.

Part D - Buskers and Street Performers

Clearly, street preachers are not buskers and we would not consider them to be Street Performers. Buskers and Street Performers are engaged in the arts and giving a creative performance. In contrast, street preachers are communicating information, and their activities fall under the protections in Articles 9 and 10 of the ECHR. Given this, it would be helpful if you could somehow make clear that street preachers are not considered to be street performers for the purposes of the code.

Once again, we very much appreciate being asked to contribute to this consultation.

Kind regards

Sam Webster

Solicitor Advocate | [The Christian Institute](#)



Coventry City Community Church

The Salvation Army, Coventry City Corps

Response to the Consultation on the Renewal of the Public Spaces Protection Order (PSPO)

20 July 2026

The Salvation Army welcomes the opportunity to respond to Coventry City Council's consultation on the proposed renewal of the Public Spaces Protection Order for Coventry city centre.

As both a Christian church and a registered charity, we support the Council's objective of maintaining a city centre that is safe, welcoming and accessible for everyone. We recognise the need for appropriate powers to address behaviour that causes harassment, alarm or distress and welcome the Council's stated intention that the renewed PSPO should be behaviour-based, proportionate, enforceable and legally robust.

Our comments relate specifically to those aspects of the proposed Order concerning amplification equipment and public activities within the city centre.

The Salvation Army has served Coventry for over one hundred and forty-eight years and has enjoyed the Freedom of the City since 14 October 1943. Alongside our extensive practical and pastoral work across the city, our Christian ministry has always included a modest public presence through occasional open-air meetings, collecting days and seasonal carol singing.

These activities are undertaken peacefully and respectfully. Their purpose is not to create nuisance but to make ourselves publicly available to members of the community through music, Christian witness, conversation and prayer for those who wish to engage.

We recognise that inappropriate or excessive use of amplification can become a public nuisance and support the Council's intention to address behaviour that has a detrimental impact on others.

We would, however, encourage the Council to ensure that:

- any authorisation process for amplification equipment is clear, proportionate and accessible to community, charitable and faith-based organisations;
- decisions continue to be based upon the impact of an activity rather than its viewpoint or purpose;
- the implementation of the Order maintains a clear distinction between behaviour causing harassment, alarm or distress and peaceful public engagement undertaken responsibly;
- the Council continues its positive practice of engagement and dialogue with organisations using the city centre for legitimate charitable, community and faith-based purposes.

The Salvation Army values its longstanding partnership with Coventry City Council and remains committed to working collaboratively to ensure that Coventry city centre is both welcoming and vibrant for all who live, work and visit the city.

We appreciate the opportunity to contribute to this consultation and would be pleased to engage further with Council officers should that be helpful during the implementation of the renewed PSPO.