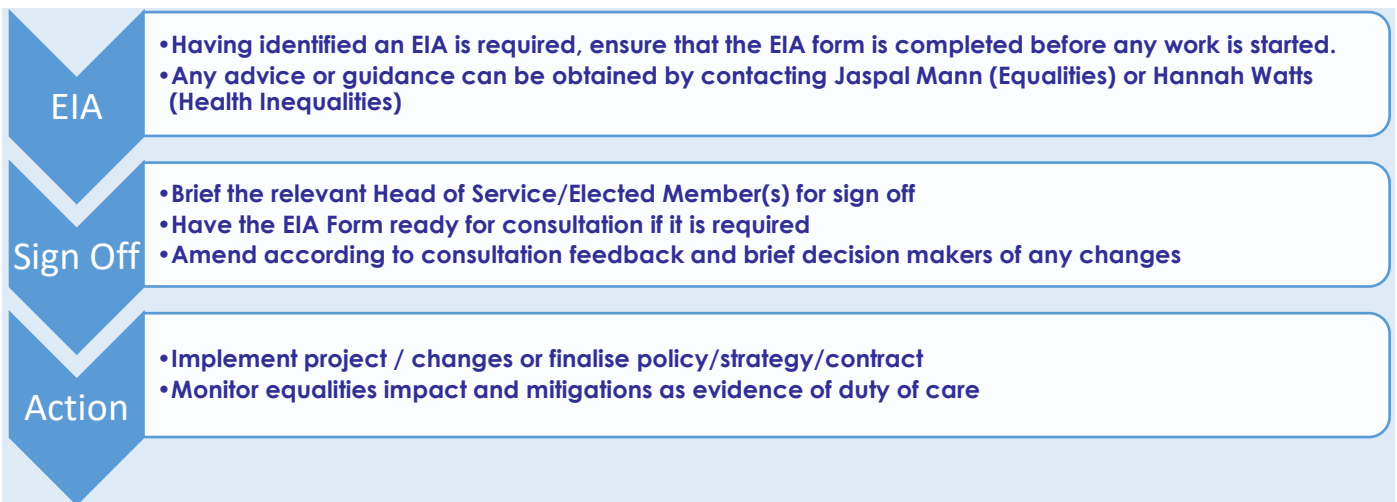


EQUALITY IMPACT ASSESSMENT (EIA)



EIA Author	Name	Faye Griffiths
	Title	Engagement Manager
	Date of completion	04/03/2022
Head of Service	Name	Adam Hunt
	Title	Strategic Lead - Property and Development
Cabinet Member	Name	Cllr Jim O'Boyle
	Portfolio	Jobs, Regeneration and Climate Change



SECTION 1 – Context & Background

1.1 What is the area of work for the EIA?

The EIA is being undertaken to inform decision making regarding the making of a Compulsory Purchase Order (CPO) (including the appropriation of land for Planning purposes, applications for relevant Highways Orders and the extinguishment of Rights of Way and Rights of Statutory Undertakers) by the Council to support the delivery of the Council's key regeneration project for the city, City Centre South (CCS).

A CPO will authorise the Council to acquire the land and create new rights in order to bring forward the CCS site for a comprehensive mixed-use development of up to 1300 new homes, new commercial premises and leisure facilities and new public spaces.

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1.2 In summary, what is the background to the planned change? Why is this change being considered?

The CCS scheme will transform (through demolition of existing buildings and new development) seven hectares of the city centre. The existing site where the CCS scheme will come forward is currently home to c.150 existing businesses and property interests. The Council is negotiating with these businesses and property owners to acquire their interest by agreement but a CPO is considered very likely to be still required in order to ensure all land required for the scheme is brought into the Council's control as well as all new rights that the Council needs in order to see the scheme implemented.

The CCS scheme received a resolution to grant outline Planning Consent in April 2021. Once further relevant Reserved Matters Planning Consents are obtained and funding secured, the scheme will be able to proceed (this is likely to be from 2023 onwards).

1.3 Who has primary responsibility for delivery?

On the Council side, the Property and Development Service.

1.4 Who are the main stakeholders? Who will be affected?

21st Century Society Access Development Group Aviva Bus operators Businesses and landowners being Compulsory Purchased City Centre residents Coventry and Warwickshire LEP Coventry BID Coventry Chamber of Commerce Coventry Society Coventry University Disability Equality Action Partnership Elected Members Federation of Small Businesses Local Media	Local Members of Parliament Local People Lower Precinct Shopping Centre Methodist Hall Landlords Nearby businesses Planning Authority Retail Market Traders Royal London Asset Management Shearer Property Group Shopmobility Statutory Undertakers Student Accommodation Transport for West Midlands West Midlands Combined Authority West Orchards Shopping Centre
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SECTION 2 – Consideration of Impact

2.1 In order to assess your area of work for relevance to the Equality Act 2010 and the Public Sector Equality Duty, please answer the following questions:

Does this area of work have due regard to the need to: -

- (a) Eliminate discrimination, harassment, victimisation and any other conflict that is prohibited by the Equality Act 2010
- (b) Advance equality of opportunity between two persons who share a relevant protected characteristic and those who do not
- (c) Foster good relations between persons who share a relevant protected characteristic and those who do not

Yes (x) No ()

If No please explain your reasons reason/s below:

2.2 Baseline data and information (sources and dates if applicable and relevant to the area of work/changes outlined in the EIA only. This data is needed to help decision makers understand more clearly the purpose of the EIA, so it needs to be simple and specific to the EIA being considered)

[Cabinet Report – January 2017](#)

The report sought approval to appoint SPG following a formal tender process, accept funding from West Midlands Combined Authority and to approve the principle that a Compulsory Purchase Order may be required (i.e. first resolution to grant). These recommendations were approved with no equalities issues raised.

[Public Consultation 26 June – 17 July 2020](#)

Ahead of the scheme's Outline Planning Application Submission, Shearer Property Regen carried out a public consultation exercise which focused on the vision and themes of the proposed scheme. Due to the COVID -19 pandemic and related restrictions, the consultation was primarily digital, with paper copies of information sent where requested. There were a number of webinars

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for stakeholders and local people. A webinar and question and answer session also took place for traders who may be affected by the scheme.

There were 282 responses to the consultation survey with 62% of these supporting the vision for City Centre South and 88% wanting to see improved pedestrian links and public spaces in the city centre.

Responses relating to equalities issues included:

- Maintain walkable scale and navigable layout
- City Centre South should be accessible for vulnerable groups
- A desire for increased leisure and recreation activities, with an emphasis on delivering a variety of leisure facilities to serve the diverse demographics within the city
- Housing should support the local population, with a proportion for affordable housing
- Ensure access for those with mobility issues
- Culture can bring communities together and keen to see the scheme promote this
- Would like to see facilities for step-free access in the city centre

[Outline Planning Application – Resolution to Grant Consent April 2021](#)

Planning Committee resolved to grant planning permission in April 2021 (Decision Notice Granted on the 27th January 2022) and noted the following equalities implications:

The Development Principles Document secures positive accessibility principles, including the mandatory principle to mitigate existing steep gradients on Hertford Street.

A condition will be imposed to require the Shopmobility facility in Barracks Car Park to be replaced to a suitable location within the city centre prior to the demolition of this building to ensure that the Shopmobility service is not disrupted. A further condition requires details of disabled car parking spaces to replace the five spaces lost by the works to be submitted to and approved by the local planning authority prior to commencement of any works to demolish the bridge link between Coventry Market and the buildings on Market Way.

The applicant notes that any works to be undertaken to Coventry Market will be phased to ensure that there is continuous pedestrian and servicing access into Coventry Market. This and phasing of the wider development will also be secured by condition.

The Council's Property Team are liaising separately with existing businesses within the CCS site to ensure that they are fully supported through the transition period.

[Equalities and Communication survey – May 2021](#)

An equalities and communication survey was sent to approx. 130 businesses and property owners who may be impacted by the City Centre South Scheme. Due to a low response initially, this was sent to businesses on two separate occasions. In total, thirteen businesses responded

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and gave us information about their demographics and any specific needs they had regarding how we communicate with them. This includes two businesses who require information in a second language and seven businesses who require written information in a larger font. Within the survey, a question was asked regarding whether customers of the business are predominantly from a particular group or community, so that we could measure impact on customers and not just the businesses affected. Two businesses responded that they are and this is included in the information below.

2.3 On the basis of evidence, has the potential impact of the area of work been judged to be positive (+), neutral (=) or negative (-) (+&-) Positive and negative impacts for each of the protected groups below and in what way?

Please outline any impact on the Council workforce in question 2.8 – not below

Protected Characteristic	Impact type +, =, - or +&-	Nature of impact <i>(A brief description of impact as more detailed mitigation to be included in 2.7)</i>
Age 0-18	+	<p>There aren't any people within this age group who are directly impacted by the CPO process.</p> <p>The City Centre South scheme will offer jobs and training opportunities, including for those age 16-18 years. These will include construction apprenticeships and employment opportunities in retail and leisure.</p> <p>The scheme will include leisure facilities, for example a cinema, cafes and restaurants, giving social opportunities for young people.</p> <p>Improved green space and places to socialise will give parents and carers space for younger children to enjoy.</p>
Age 19-64	-	<p>Most of the business occupiers or their staff which may be affected by a CPO are within this age range and there is potential for these individuals to be negatively impacted due to business loss or relocation, depending on their own circumstances. For those individuals subject to a CPO we will:</p> <ul style="list-style-type: none"> • Communicate clearly and effectively. We have asked all potentially affected businesses to complete an equalities and communication survey so that we know where alternate approaches to communication are needed • Work with the business to establish their preferred next steps and how we can support them with this • Offer business support and relocation where possible

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		<ul style="list-style-type: none"> • Pay legal and surveyor fees • Signpost those who need any employment or career support to the Council's "Job Shop" service or DWP services <p>We know there is a need for additional housing in the city as the population has and continues to grow, particularly for those aged 19-64. New housing provision within the scheme will offer a mix of much needed high-quality housing.</p> <p>In January 2021 there was a 6% unemployment rate for those of working age. The CCS scheme will offer over 1,000 new jobs as well as 620 new construction jobs.</p>
Age 65+	+	<p>None of the respondents to the Businesses Equalities and Communication survey were within this age range.</p> <p>The scheme area currently has a poor quality environment, restricted pedestrian flow and confusing and poor signage, which has a negative impact on older people. The incidences of disability including physical mobility and sight impairments increases with age and there is a need for walkable, uncluttered and safe public realm where hazards are removed. The new scheme will include at grade access, meaning older people do not have to struggle with gradients, improved and more accessible public realm. Seating styles will cater for a range of needs, including some with arms and backrests to support this age group.</p> <p>The scheme will include positive accessibility principles, including the mandatory principle to mitigate existing steep gradients on Hertford Street.</p> <p>There will be a courtyard area for rest and relaxation and space for community use. The community use space can support opportunities to get involved in social activities, which may have positive health impacts and reduce loneliness in this group. The availability of accessible health facilities will also positively impact this age range.</p> <p>Access to essential services including chemists may be disrupted during construction</p>
Disability	+	<p>None of the respondents to the Businesses Equalities and Communication survey considered themselves to be disabled. However one business responded that their customers were predominantly disabled or have mobility issues. Seven respondents requested information in large font and this has been arranged.</p> <p>A condition of approval of the Outline Planning Application requires that the Shopmobility facility in Barracks Car Park to be replaced to a</p>

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		<p>suitable location within the city centre prior to the demolition of this building to ensure that the Shopmobility service is not disrupted.</p> <p>The new scheme will have a positive impact on disabled people by offering tactile paving at crossing points, sloped pavements as well as stairs for wheelchair and mobility scooter accessibility, at grade access and an uncluttered public realm. All aspects of the scheme will meet the required accessibility standard and will be legally compliant</p> <p>The courtyard for rest and relaxation and health facilities will also benefit this group, as well as the opportunities to be involved in community activities and events.</p> <p>The developer will work with local disability groups as designs progress to ensure that the scheme is accessible.</p> <p>Access to essential services including chemists may be disrupted during construction.</p> <p>A further condition requires details of disabled car parking spaces to replace the five spaces lost by the works to be submitted to and approved by the local planning authority prior to commencement of any works to demolish the bridge link between Coventry Market and the buildings on Market Way.</p>
Gender reassignment	=	<p>There are no specific impacts on this group, however the community spaces do offer opportunities for inclusivity events.</p> <p>One respondent of the Businesses Equalities and Communication survey indicated that the the gender they identify with is not the same as they were assigned at birth.</p> <p>One of the businesses affected is considered to be a safe space for the trans community.</p>
Marriage and Civil Partnership	=	<p>There are no specific impacts on this group</p>
Pregnancy and maternity	+	<p>The new scheme will have a positive impact on pregnant women in terms of better accessibility in the city centre. A new city centre health facility could be used by this group and better seating and public realm will also be beneficial, whether it's to rest or to use as a space to feed or sit with babies and young children.</p>
Race (Including: colour, nationality, citizenship ethnic or national origins)	=	<p>Respondees of the business Equalities and Communication survey describe their ethnic background as:</p> <p>Asian/Asian British Indian – 4 respondees Asian/Asian British other – 1 respondee Asian/ Asian British – Chinese – 1 respondee</p>

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		<p>Black/Black British African – 1 respondee White English, Welsh, Scottish, Northern Irish, British – 6 respondees</p> <p>Of these two respondees indicated that they would like correspondence in an alternative to English and this has been arranged.</p> <p>None of the businesses indicated that they provide goods or services to a specific shared background.</p> <p>As part of the equalities and communication survey, we have established those businesses that require communication in an additional language.</p>
Religion and belief	=	<p>Although very close to the affected area, there is no impact on the Central Methodist Hall other than slight potential disruption during the work. We will work closely with representatives of the church to ensure this is kept to a minimum and doesn't affect services,</p> <p>One business who responded to the Equalities and Communication Survey indicated that they offer Christian education, training and healthcare services.</p> <p>No specific impact, however, the community spaces may offer opportunities for inclusivity events and activities</p>
Sex	+	<p>Women often feel vulnerable accessing some parts of the scheme area currently. The scheme will open up the area and improve community safety. There will be a considered approach to lighting which will have a significant impact on orientation, security and visual quality. This will impact crime and the fear of crime.</p>
Sexual orientation	-	<p>The community spaces may offer opportunities for inclusivity events and activities.</p> <p>One of the affected businesses has customers predominantly from the LGBTQ+ community. We will work with the business and other representatives of this community to ensure that their requirements for a safe space to socialise are met.</p>

2.4 Health inequalities (HI) are unjust differences in health and wellbeing between different groups of people which arise because of the conditions in which we are born, grow, live,

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<p>work and age. These conditions influence our opportunities for good health, and result in stark differences in how long we live and how many years we live in good health.</p> <p>Many issues can have an impact: income, unemployment, work conditions, education and skills, our living situation, individual characteristics and experiences, such as age, gender, disability and ethnicity</p> <p>A wide range of services can make a difference to reducing health inequalities. Whether you work with children and young people, design roads or infrastructure, support people into employment or deal with welfare benefits – policy decisions and strategies can help to reduce health inequalities</p> <p>Please answer the questions below to help identify if the area of work will have any impact on health inequalities, positive or negative.</p> <p>If you need assistance in completing this section please contact: Hannah Watts (hannah.watts@coventry.gov.uk) in Public Health for more information. More details and worked examples can be found at ...</p>	
Question	Issues to consider
<p>2.4a What HIs exist in relation to your work / plan / strategy</p>	<ul style="list-style-type: none"> ● Explore existing data sources on the distribution of health across different population groups (<i>examples of where to find data to be included in support materials</i>) ● Consider protected characteristics and different dimensions of HI such as socio-economic status or geographical deprivation
	<ul style="list-style-type: none"> ● Socio economic status and deprivation ● Vulnerable groups (e.g. homeless and rough sleepers) and geographical location ● Disability and access to services
<p>2.4b How might your work affect HI (positively or negatively).</p> <p>How might your work address the needs of different groups that share protected characteristics</p>	<p>Consider and answer below:</p> <ul style="list-style-type: none"> ● Think about whether outcomes vary across groups and who benefits the most and least, for example, the outcome for a woman on a low income may be different to the outcome for a woman a high income ● Consider what the unintended consequences of your work might be

Response:

- Increased access to affordable housing for those with lower incomes
- Effects on mental and physical health resulting from new employment opportunities, but also potential end of business/business relocation
- Changes to social capital. Effects are likely to be beneficial but dependent on the quality and timing of measures introduced to encourage social cohesion and build social capital, particularly for older people, younger people and people with disabilities
- During construction – access to essential services such as banks and chemists for older people and people with disabilities
- Impact of noise disruption during construction for those that live in the area, particularly homeworkers
- Loss of perceived safe spaces for homeless and rough sleepers during demolition and construction
- Steps for Change – support service for homeless people is located in the affected area

2.5 Next steps - What specific actions will you take to address the equality impacts and health inequalities identified above?

- We distributed an equalities and communications survey to each of the potentially impacted businesses. This told us the equalities demographics for each of the businesses and whether they had any specific accessibility needs when we communicate with them. We will continue to support these requests.

At the appropriate stage of the planning, development or construction process:

- The Council and the developer will consider social value and impact on local supply chain when procuring a contractor for construction, development or service. The Council and Developer will also consider a clause in the development agreement/contract to monitor for a workforce that is made up of a proportion of local people and for a workforce that reflects the ethnic profile of the city
- The Council and developer will work with the Disability Equality Action Partnership (DEAP), Access Development Group and other disability groups to ensure the scheme is accessible
- The Council and developer will work with the Central Methodist Hall to minimise disruption to religious services and other sensitive events.
- The Council and developer will work with representatives of the LGBTQ+ community (and relevant existing businesses in the red line area) in to ensure there is sufficient safe space to socialise in the city

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- The Council and developer will work with Steps for Change to ensure there is sufficient support for homeless people and rough sleepers. We will also ensure that the support services are aware of demolition timetables so they can support anyone who may be sleeping in affected areas
- The Council and developer will work with any essential services (banks, chemists, healthcare) that may be relocated or closed during demolition/construction to ensure that vulnerable groups are aware of changes and know how to access services during demolition/construction
- The Council and developer will work with partner organisations including the Job Shop, Chamber of Commerce and the Federation of Small Businesses to offer support for affected businesses. This will include opportunities to relocate businesses as well as support for those who no longer wish to run a business or whose business is unviable in a new location. Further information is available at www.coventry.gov.uk/ccsbusinessinfo
- The Council and developer will offer affected businesses the opportunity to pre-register for marketing information about new business space within the development area.

2.6 How will you monitor and evaluate the effect of this work?

- We will continue to communicate efficiently and clearly with those businesses impacted and ensure any equalities issues are responded to
- We will be advised and respond to feedback from representatives of protected characteristic Groups
- The developer will engage with accessibility consultants on the design of the scheme
- The Council and development and construction partners will implement effective equalities monitoring so that outcomes proposed can be verified and based on clear equalities evidence

2.8 Are there any potential impact(s) of this area of work on Council staff from protected groups? Please summarise:

No

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You should only include the following data if this area of work will potentially have an impact on Council staff. This can be obtained from: andy.hyland@coventry.gov.uk

Headcount:

Sex:

Female	
Male	

Age:

16-24	
25-34	
35-44	
45-54	
55-64	
65+	

Disability:

Disabled	
Not Disabled	
Prefer not to state	
Unknown	

Ethnicity:

White	
BAME	
Prefer not to state	
Unknown	

Sexual Orientation:

Heterosexual	
LGBT+	

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Prefer not to state	
Unknown	

Religion:

Any other	
Buddhist	
Christian	
Hindu	
Jewish	
Muslim	
No religion	
Sikh	
Prefer not to state	
Unknown	

2.9 Completion Statement. Put an X in the appropriate box

NOTE: (to be completed after the EIA is completed but, before the area of work commences)

As the appropriate Head of Service for this area, I confirm that in this EIA the potential equality impact is:

No impact has been identified for one or more equality groups

Positive impact has been identified for one or more equality groups

Negative impact has been identified for one or more equality groups

Both positive and negative impact has been identified for one or more equality groups

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Signed Head of Service: Adam Hunt (Strategic Lead – Property and Development)	Date: 04/03/2022
If applicable complete information below:	
Name of Lead Elected Member: Cllr O’Boyle (Cabinet Member for Jobs, Regeneration and Climate Change)	Date sent to Councillor: 07/03/2022
Name of Director: Richard Moon (Director of Property Services and Development)	Date sent to Director: 04/03/2022