



Information Governance Team

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Dear Sir/Madam

**Environmental Information Regulations 2004 (EIR)
Request ID: FOI494252111**

Thank you for your request for information relating to A Net Zero Routemap for Coventry/Climate Change Board.

You have requested the following information:

Coventry City Council's Climate Change Strategy 2023-2030 'A Green Future for a Changing City (attached) mentions a Net Zero Routemap for Coventry commissioned by the Council using public funds and drafted by Andy Gouldson (p. 22 - includes a picture of the front page of the strategy).

At the launch of the draft climate strategy (15 Feb), I asked CCC's Head of Sustainability Bret Willers if he could share the Routemap, to which he responded yes.

Since then, I have formally requested the document from Bret and Andy Gouldson (beginning 16 Feb), a request which has been seconded by my elected representative Cllrs Bally Singh and Jayne Innes (Whoberley Ward).

Bret replied to me on Friday 17 Feb 2023 saying that Our ICT team are asking for a 'word version' of the document so we can download onto the website into a form that enables visually impaired to access the document. There are a couple of minor typos that we will need to put right so hope to have it up on the website next week.

I still haven't received a copy of the Routemap nor can I see it published anywhere on the CCC website.

I am now, therefore, writing to you under the Environmental Information Regulations (2014) to request the following information from you:

- ALL versions of the Routemap, including the one mentioned that has a couple of minor typos

The final version of the route map is available on the Council website as per Regulation 6(1)(b) and can be accessed on the following link:

<https://www.coventry.gov.uk/downloads/download/7469/net-zero-carbon-route-map-for-coventry>

In the development of the Routemap, the earlier version, as referenced in your request, was very much a draft and was never intended as a final document, more for information to illustrate the area of content, format and style which required errors to be amended and data to be updated. This included small spelling/accessibility errors but also required updates to the release of new up to date government data including the BEIS data for 2020, changes in housing number allocations for the City within the Regional Target set by Government and a change in the target date to reflect the Government's target of net zero by 2050, which the City Council has agreed to be the target date and not that of 2041 as proposed by WMCA.

The penultimate version from Professor Andy Gouldson required some minor grammatical alterations and included the introduction of a glossary as attached. Please note, originally Andy Gouldson set a target date of 2041 which is the WMCA target, but we have not adopted a target date apart from the national 2050 one.

- Any other reports on the implementation of the Routemap and/or Climate Change Strategy - for example impact or risk assessments

The Routemap is an analysis of the city's impact on carbon emissions which has helped to inform the Low Emissions section of the draft Climate Change Strategy, it has identified a number of priority areas for action. Using the Routemap and responses from the public consultation the City Council will be identifying specific actions relating to the areas of activity defined in the Strategy. It is these individual actions once defined in sufficient detail which will have their individual impact and risk assessments carried out.

- Any relevant raw data or analyses that could be used to verify the analysis provided in the Routemap and/or Strategy, or that could be used to perform an independent assessment/strategy/routemap.

Raw data and analysis were conducted independently by Andy Gouldson and not directly by the Council, therefore this data is not stored by the Council. The Methodology Report used by Andy Gouldson is available on the Council website as per Regulation 6(1)(b) and can be accessed on the following link:

<https://www.coventry.gov.uk/downloads/download/7469/net-zero-carbon-route-map-for-coventry>

I am also pleased to see, following an earlier information request, that the Terms of Reference, notes and agendas for the Coventry Climate Board have been published. However, there are some

documents missing. Please could you send:

- The notes for 20 June 2022 meeting

We confirm the information is available on the Council website as per Regulation 6(1)(b) and can be accessed on the following link:

<https://www.coventry.gov.uk/downloads/download/7267/coventry-s-climate-change-board-meeting-notes-and-agendas>

- All the attached, supporting or mentioned documents, including presentations, that are referred to in the notes that have not been published alongside the notes. (E.g. Eon Presentation – see slides 14 September - including but not restricted to this instance).

Meeting notes and agendas are published on the following web address:

<https://www.coventry.gov.uk/downloads/download/7267/coventry-s-climate-change-board-meeting-notes-and-agendas>

Please note that not all presentations and supporting documents can be published due to potential of commercially sensitive information and the partner agency requesting it not be circulated outside of the Board meetings. It is our view that the information is exempt from disclosure under Regulation 12(5)(e) – Commercially Sensitive Information. Regulation 12(5)(e) exempts information from disclosure where disclosure of that information would, or would be likely to, prejudice the commercial interests of any person (an individual, a company, the public authority itself or any other legal entity).

It is the Council's position that the third-party providers and its own commercial interests would be prejudiced and/or would be likely to be prejudiced by the disclosure of the requested information.

Once the information is disclosed this means that it will be in the public domain, and it could not only be used by the requester but also any other providers in a similar market.

Arguments in favour of disclosure.

- Promote accountability and transparency for the Council's decisions and in its spending of public money.
- Assist the public to understand and challenge our decisions.
- Inform the public of the activities carried out on their behalf, allowing for more user involvement and collaborative decision making.
- Enable the public to better scrutinise the public monies spent

Arguments against disclosure.

- There is a public interest in allowing public authorities to withhold information which if disclosed, would reduce providers' ability to compete in a commercial environment.
- The successful providers operate in a competitive market. If prejudicing the commercial interests of the successful providers in the market would distort competition in that market, this would not be in the public interest.

- Disclosure of information may cause unwarranted reputational damage or loss of confidence in the Council.
- Revealing information such as a pricing mechanism can be detrimental to a provider's commercial interest. If an organisation has knowledge of a provider's business model, it can exploit this for its own commercial interest. This would also have a detrimental impact on the Council on other contracts and procurements by distorting the market, for the reasons stated above.

Having considered the arguments for and against disclosure, the Council has decided that the public interest in this case is best served by maintaining the exemption under Regulation 12(5)(e) EIR and by not disclosing the information requested.

The decision to withhold the information requested is therefore upheld on the basis that Regulation 12(5)(e) in relation to commercially sensitive information has been applied correctly.

- **Notes for 11 January 2023 meeting**
- **Date and agenda for next meeting**

In regards to the meeting notes, we can advise that the documents referred to are unfinished working documents and are exempt under EIR Regulation 12(4)(d) – Unfinished documentation.

As with the other exceptions in the EIR, when regulation 12(4)(d) is engaged, the public authority must still carry out the public interest test in order to decide whether the information should be withheld. Under regulation 12(1)(b), the public authority can only withhold the information if, in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information.

Public Interest Argument

The Council does not dispute that information needs to be made available in the public domain in order to have a balanced and open debate. However, it has a duty to ensure that the information it releases is accurate, reliable, comprehensive, and above all, is complete. Releasing incomplete or partial data would not aid, but rather hinder the debate as the public would not have access to the full suite of information necessary to make a well informed and balanced decision.

It is the Council's opinion that it can only be in the public interest to release this information when it is completed and contains sufficient detail for members of the public to take a balanced and well-informed view on the impact of the plan.

In reviewing the decision to withhold this information we believe the public interest in withholding the information outweighs the public interest to disclose it and therefore made the decision to withhold this information.

The minutes for the last Board meeting will not be released until they have been presented to the next meeting of the Climate Change Board to be ratified as an accurate record by the members of the Board. Once ratified the minutes will be available at the following address:

<https://www.coventry.gov.uk/downloads/download/7267/coventry-s-climate-change-board-meeting-notes-and-agendas>

The next board meeting has been set for 20th April 2023. The agenda will be published on the link above.

Thank you. If some of these documents will take more time to source, please could I get the documents related to the Routemap first. If the supporting data for the Routemap will also take longer, please could you send the Routemap itself asap, and also the risk/impact assessment if also already existing.

Please could you also note that the original request for information - the Routemap at least - was on 16 Feb, so this should be considered the beginning of the 20 working days period for a response, so I would expect a response now by 13 Feb.

The supply of information in response to a FOI/EIR request does not confer an automatic right to re-use the information. You can use any information supplied for the purposes of private study and non-commercial research without requiring further permission. Similarly, information supplied can also be re-used for the purposes of news reporting. An exception to this is photographs. Please contact us if you wish to use the information for any other purpose.

For information, we publish a variety of information such as: [FOI/EIR Disclosure Log](#), [Publication Scheme](#), [Facts about Coventry](#) and [Open Data](#) that you may find of useful if you are looking for information in the future.

If you are unhappy with the handling of your request, you can ask us to review our response. Requests for reviews should be submitted within 40 days of the date of receipt of our response to your original request – email: infogov@coventry.gov.uk

If you are unhappy with the outcome of our review, you can write to the Information Commissioner, who can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or email icocasework@ico.org.uk.

Please remember to quote the reference number above in your response.

Yours faithfully

Information Governance