
Name or Organisation: Police & Crime Commissioner for West Midlands

1. To which part of the Local Plan Review does this representation relate?

Glossary

2. Do you consider the Local Plan Review is:

(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate.

3. Please give details of why you consider the Local Plan Review is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan Review or its compliance with the duty to co-operate, please also use this box to set out your comments.

Whilst the current glossary is not proposed to be amended, nevertheless the PCCWM considers that it needs to be updated to reflect his representations to policies AC1, AC4, AC5, AC6, DE1, DS3, H7, H10, H11, H13, HE3, HW1, IM1, R2, R5 and R6. In particular, the glossary fails to mention infrastructure / the emergency services and this omission should be rectified.

4. Please set out the modification(s) you consider necessary to make the Local Plan Review legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The PCCWM requests the inclusion of infrastructure / the emergency services in the glossary and suggests the following definition:

“Infrastructure: Generic term to describe structures or buildings, services and facilities which support residents, animals and nature residing in certain areas. This could be in terms of transport, for example walking, cycling paths and public transport infrastructure, in social infrastructure in the form of community or health facilities, measures to improve the emergency services or measures to improve and

encourage nature and climate change adaptation and mitigation in the form of green and blue infrastructure.”

Additionally, the PCCWM requests two new additions as follows:

Secured by Design

Secured by Design (SBD) is the official police security initiative that is owned by the UK Police Service with the specific aim of reducing crime and help people live more safely. The Police seeks to improve the physical security of buildings using products, such as doors, windows, locks and walling systems that meet SBD security requirements. In addition, the Police include proven crime prevention techniques and measures into the layout and landscaping of new developments, such as maximising natural surveillance and limiting excessive through movement.

Through SBD, the Police work closely with builders, developers, local authorities and registered housing associations to incorporate police crime prevention standards from initial concept and design through to construction and completion. West Midlands Police have specially trained Designing Out Crime Officers (DOCOs) who offer police designing out crime and Secured by Design advice free of charge.

Park Mark

The Safer Parking Scheme is a national standard for UK car parks that have low crime and measures in place to ensure the safety of people and vehicles. Each car park undergoes a rigorous assessment by specially trained police assessors and a Park Mark is awarded to each car park that achieves the challenging standards. A Park Mark is awarded to parking facilities that have met the requirements of a risk assessment conducted by the Police, meaning the operator has put in place measures that deter criminal activity and anti-social behaviour.

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues they identify for examination.

5. To which part of the Sustainability Appraisal (SA) report does this representation relate?

Paragraph

N/A

Please add any further comments relating to the SA report in the box below

6. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

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Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To address the Council's Responses and the Inspector's Matters, Issues and Questions, and to further assist the Inspector with regard the case made by PCCWM regarding the glossary.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.