
Name or Organisation: Police & Crime Commissioner for West Midlands

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

Paragraph Policy

2. Do you consider the Local Plan Review is:

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

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.

In relation to Policy DS3, the PCCWM made the following representation to the Regulation 18 consultation:

*"The PCCWM therefore **supports** the updating of the policy and specifically to refer to the priorities of crime reduction and reduction in the fear of crime, as referenced in the One Coventry Plan."*

However, the Consultation Statement does not acknowledge this representation. Although it is acknowledged that it is not necessarily an inclusive list of how the policy will measure the achievement of sustainable development, nevertheless it omits any reference to reducing crime or the fear of crime which is considered to be a key requirement towards the achievement of sustainable development.

The PCCWM therefore **OBJECTS** to the omission and requests the addition of further sub-paragraphs to Policy DS3 making reference to "**the creation of secure and safe living environments**" and "**measures to reduce crime and reduction in the fear of crime**".

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 addition of further sub-paragraphs to Policy DS3 making reference to **“the creation of secure and safe living environments”** and **“measures to reduce crime and reduction in the fear of crime”**.

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

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

(Continue on a separate sheet /expand box if necessary)

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 Policy DS3.

(Continue on a separate sheet /expand box if necessary)

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.