
Name or Organisation: Police & Crime Commissioner for West Midlands

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

Paragraph Policy

4. 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.

5. 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 H10, the PCCWM made the following representation to the Regulation 18 consultation:

*"The PCCWM **supports** the rewording of Policy H10: Student Accommodation to ensure that for HMO proposed conversions, these will be assessed in line with the HMO DPD (upon which the PCCWM has made representations and wishes to appear at the forthcoming Examination)."*

However, the PCCWM considers that specific reference should be made in Policy H7 to the need to considers that there should be clear standards against which such applications are considered. These standards should include adequate provisions to design out crime.

The policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained."

The Consultation Statement does not acknowledge this representation, nor is it reflected in the policy itself. However, whilst the PCCWM favours the principle of a policy which supports Student Accommodation, nevertheless he considers that further consideration should be given to his recommendations in the interests of

reducing crime and the fear of crime accordingly, as set out in the justification in the representation of the PCCWM regarding Policy H13.

6. 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 considers that the policy should make reference to consultation with Design Out Crime Officers (DOCO) at the pre-application and planning application stage, the need for all proposals to meet Secured by Design principles and the need for a management plan to ensure crime prevention measures are maintained.

Policy H10 should therefore be amended by the inclusion of a clause such as:

'All proposals will be expected to demonstrate how the relevant 'Secured by Design' principles have been met including the outcome of consultation with Design Out Crime Officers (DOCO) at the pre-application stage and preparation of a management plan to demonstrate how the crime prevention measures will be maintained.'

7. 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

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

8. 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)

☒

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.

9. 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 H10.

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.