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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.

The PCCWM made the following representation to the Regulation 18 consultation:

*"The PCCWM requests that Policy HE2 'Conservation and Heritage Assets' be amended to include a bullet point to address the significant problem of Heritage crime. Theft of lead flashing, cast-iron down pipes and other historic artifacts is a significant problem, particularly in Conservation Areas and for Listed Buildings. The PCCWM recommends the introduction of policy wording which would allow for a pragmatic approach to the replacement of historic and traditional materials stolen. Rather than seeking 'like for like' replacement, use of 'alternative' products available on the market, such as those produced by Yeoman Rainguard and other suppliers in the market should be encouraged. Replacement of stolen goods effectively by 'replica' products which visually match items stolen would prevent repeat theft and mean that the building owner was not vulnerable to this crime again.*

The Consultation Statement does not acknowledge this representation, and it is extremely disappointing that the requested amendment has not been incorporated into the policy. For the reasons set out in his original representation, the PCCWM considers that further consideration should be given to his recommendations in the interests of reducing heritage crime and the fear of crime. The PCCWM therefore **OBJECTS** to the omission of the requested bullet point.

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.

For the reasons set out in his original representation, the PCCWM considers that Policy HE2 should be amended to include the following bullet point:

**“Favourable consideration will be given to the use of approved ‘alternative’ materials to replace building materials and artefacts stolen to reduce crime and the fear of crime”**

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

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

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**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.

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 HE2.

***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.***