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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 notes the removal of Part 2 of Policy R2 given the City Centre Area Action Plan is adopted. However, he reiterates his representation to the Regulation 18 consultation that:

*"..it will be important to ensure that review of the AAP includes appropriate reference to the need to design out crime due to its specific importance within city centres and new developments. This should include the security of staff, the buildings and the sites themselves, which need to be taken into account from the outset of the design process. It is suggested for continuity that reference is added into Policy R2 to ensure that the Local Plan and the AAP are appropriately cross referenced."*

The PCCWM notes that there are no plans to designate primary or secondary retail frontages outside the city centre for the reasons given in paragraph 7.15 of the consultation draft and that a separate policy to limit the concentration of sui generis uses dominating shopping frontages in appropriate centres is no longer proposed as set out in the Consultation Statement.

The PCCWM **objects** and requires the strengthening of clause i. to read as follows:

- i. *Providing an attractive, **safe and secure environment for pedestrians, cyclists and motorists, including integration of ‘Secured by Design’ and ‘Park Mark’ principles.***

(Suggested changes in bold and underlined).

Furthermore, it also noted that clause I. continues to refer to the importance of ‘*Continuing to develop a vibrant and attractive nighttime economy.*’ In this respect, the PCCWM made the following representation to the Regulation 18 consultation:

*“The PCCWM acknowledges that there are benefits and disbenefits of a vibrant and mixed evening and night-time economy, confirming that this can introduce new activity and help valued cultural, recreational and social assets like pubs and music venues to be retained, but it can also have negative impacts on local residents and the local environment needs to be carefully managed.*

*The PCCWM considers it prudent to include a specific evening economy policy within the Coventry Local Plan as specific issues are not necessarily covered elsewhere in the Plan. In doing so, the aim is to reduce crime, the fear of crime, anti-social behaviour and potential disturbance to existing businesses and people. If crime, or the fear of crime is not addressed, people will not feel safe, are unlikely to use the entertainment/night-time facilities, with potential of an economic spiral of decline. Bars, restaurants and shops will close and be boarded up, resulting in less people being attracted to the area, leading to the closure of more premises and companies going out of business. Such a policy would deliver economic, social and environmental sustainability.”*

The representation continued to detail the issues for a policy to consider. However, the Consultation Statement does not acknowledge this representation and there is no discussion on why no specific evening economy policy is proposed, particularly in the current absence of any policy in the consultation draft to reduce crime or the fear of crime. The PCCWM therefore continues to **OBJECT** to the omission of a specific evening economy policy.

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.

Amend clause i. of Policy R2 to read as follows:

- i. *Providing an attractive, **safe and secure environment for pedestrians, cyclists and motorists, including integration of 'Secured by Design' and 'Park Mark' principles.***

(Suggested changes in bold and underlined).

Introduce a specific evening economy policy.

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 R2.

***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.***