
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 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.

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.

Whilst the PCCWM did not make any representations to the Regulation 18 consultation regarding this policy, nevertheless he considers that there is a case for specific policy reference to Gambling and Alternative Financial Services on the following lines:

“proposals for all pay day loan shops, pawnbrokers, and gambling uses will take full account of any issues concerning community safety, crime, and disorder and will, where necessary, seek advice from the police and other safety organisations.”

The Consultation Statement suggests, albeit in relation to Policy R2, that no justification has been made to justify such an addition to policy on the grounds that ‘In terms of gambling uses, the national picture shows a decline in high street establishments due to online presence.’ However, the PCCWM considers that the justification arises from crime and safety issues that can, and does, occur in relation to such uses. The PCCWM therefore recommends the inclusion of a specific policy reference to Gambling and Alternative Financial Services.

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.

Introduce a specific policy reference to Gambling and Alternative Financial Services.

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)?

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 R5.

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.