Name or Organisation: Police & Crime Commissioner for West Midlands

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(1) Legally compliant (2) Sound Yes No (3) Complies with the Duty to co-operate Yes No 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	Paragraph Policy	R5			
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Review le soundness compliance You will ne compliant	out the modification(s) you consignally compliant and sound, in a matters you have identified with the Duty to Co-operate is in ed to say why each modification or sound. It will be helpful if you right of any policy or text. Please	respect o at 5 abov capable of i will make th are able to	f any legal compliance or e. (Please note that non- modification at examination). he Local Plan Review legally put forward your suggested
Introduce a	specific policy reference to Gamb	ling and Alte	ernative Financial Services.
7. To which բ	part of the Sustainability Apprais	al (SA) rep	ort does this representation
Paragraph	N/A		
Please add a	ny further comments relating to t	ne SA repo	rt in the box below
•	presentation is seeking a modifi y to participate in examination he		
	No , I do not wish to participate in nearing session(s)	V	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.

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.

9. If you wish to participate in the hearing session(s), please outline why you consider