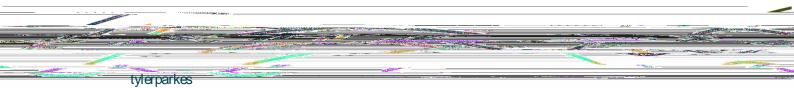


Planning and Architecture | advice | applications | drawings



This is intentionally blank.

CONTENTS

| 1. | Introduction | 4 | |
|----|---|--------|----|
| S | Scope of this statement | 4 | |
| 2. | Matter M: The natural and historic environment (BDP policy TP12) | 4 | |
| C | Question: b) Does the policy adequately reflect the Strategy for the Conservation | | |
| [| DQG (QMR\PHQW RI %LUPLQJKDP¶V +LVWRULF (QYLUR | RQPHQW | DQ |
| S | Strategy, and does it include adequate provisions in respect of Conservation Areas, | | |
| b | uildings at risk, post-war architecture, and crime reduction? | 4 | |
| R | Response | 4 | |
| R | Reasons | 6 | |
| | The Heritage Crime Research: the size of the problem (2012) | 6 | |
| | Consideration of site circumstances and heritage environment | 6 | |
| | Significance of materials/artefacts | 7 | |
| | Examples of practice in the PCCWM area | 7 | |
| 3. | Conclusion /Proposed changes to TP12 | 8 | |

Tyler

used where artefacts have been stolen to reduce repeat crime and the fear of crime. In so reducing crime, this will reduce the drain on police resources presently required to respond and investigate such matters.

- 2.3 The intention here is to avoid an unnecessary drain on police resources.
- 2.4 Instead of insisting in all cases on a like-for-like reinstatement of materials where they have been removed, consideration ought to be given to the use of alternative materials and /or artefacts which are less likely to be vulnerable to repeat theft.
- 2.5 BCC does not propose any Main Modifications to the wording of BDP policy TP12.
- 2.6 PCCWM considers the wording proposed by BCC in TP12 does not give sufficient flexibility for decision makers to allow consideration of crime prevention and the fear of crime in applications that relate to heritage assets and the historic environment. In consequence it is not in accordance with NPPF paragraph ³ H F R Q R P L F V R F L D O D Q G H Q Y L U R Q P H Q W D O J D L Q sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable V R O X W L R Q V [′]
- 2.7 It must surely be the case that crime reduction, avoidance of repeated crime, and protection measures are inherent elements of both economic and social sustainability which are of equal importance to any environmental aspects.
- 2.8 It is contended that this lack of flexibility within the policy:
 - Prevents consideration of the particular circumstances of the heritage environment, site context, and merits of the case. In particular whether repeat crime (such as theft of materials from a building) is highly likely.
 - Appears to ignore the potential damage to an historic asset that may result from repeated theft of existing and subsequent like-for-like replacement materials. For example metal theft (roof, gutters and down pipes) from historic churches.
 - Fails to recognise consideration ought to be given to the significance of that particular element of the building (to be re-instated in the event of theft) in terms of its contribution to the value of thent of 4B(en)3 of 4B(en)3 mstancesetal the existing

Reasons

The Heritage Crime Research: the size of the problem (2012).

2.9 (http://www.english-heritage.org.uk/content/imported-docs/f-

j/researchsummary.pdf) This research suggests that there are around 75,000 crimes affecting designated historic buildings and sites annually ±around 200 a day. Offences range from damage to listed buildings and other sites, theft of artefacts, theft of metal, antisocial behaviour and damage to conservation areas.

2.10 Other statistics arising from this research includes:

Damage to listed buildings

‡RI DOO OLVWHG EXLOGLQJV ZHUH SK\VLFDOO\ DIIHFThat is over 70,000 listed buildings.

‡)RU DERXW RI OLVWHG EXLOGLQJV WKH LPSDFW IURP substantial.

‡ 2XU PRVW SUHFLRXV EXLOGLQJV DUH WKH ZRUVW DIIHFV II* buildings were subject to heritage crime, compared with 18.3% of grade II buildings.

[‡] 7 KH ELJJHVW VLQJOH WKUHDW ZDV PHWDO WKHIW ZLWK I/II* and grade II buildings respectively affected by this current problem.

‡ /LVWHG FKXUFKHV DQG RWKHU UHOLJLRXV EXLOGLQJV D with about 3 in 8 (37.5%) being damaged by crime last year. Metal theft from religious buildings is a particular problem with 14.3% affected.

Damage to conservation areas

+ HULWDJH FULPH JHQHUDOO\ LV VWLOO D VLJQLILFDQW with an incidence rate of 14.9% last year, but is lower than for listed buildings.

‡ 0 H W D O W K H I W L V D F R Q V L G H U D E O \ O R Z H U W K U H D W W K D last year compared with 6.7% for grade I and II* listed buildings and 5.2% for grade II.

Consideration of site circumstances and heritage environment

2.11 There will be cases where to install the same material or artefact were it was stolen is likely to lead to repeat theft and the use of alternative materials

- 2.12 The use therefore of replacement material (along with the installation of VLJQDJH DURXQG WKH VLWH LQGLFDWLQJ WKH PDWHULDO K WKHIW YDOXH¶ RSWLRQ WKDW SURYHV YDOXHOHVV WR DQ\ suitable measure, or an important part of a range of measures, to deter crime.
- 2.13 The principle of this approach is accepted by English Heritage (the 3rd SDUD LQ 6HFWLRQ RI WKH GRFXPHQW μ(QJOLVK +HULWDJH 0HWDO IURP &KXUFK %XLOGLQJV¶ VWDWHV

³ (Y yddase is assessed on its merits, but we appreciate that there will be instances in which a change of material will be appropriate, especially when the area of roof is not visible from ground level. After a theft, the first priority must be to provide emergency cover whilst the permanent replacement is arranged. In some situations, a durable replacement such as terne-coated stainless steel, tiles or slates, rather than lead, might be the most prudent ZD \ WR UHSDLU WKH EXLOGLQJ'

Significance of materials/artefacts

- 2.14 In addition there may be cases where although desirable to have a like for like replacement of materials or artefacts, after theft, consideration ought to be given to the significance and contribution that the particular element of the building or artifact makes to the historic quality of the asset.
- 2.15 This aspect is touched upon in the now closed consultation undertaken by (QJOLVK + HULWDJH µ+LVWRULF (QYLURQPHQW * RRG 3UDFWL 'HFLVLRQ WDNLQJ LQ WKH KLuWattioR draftFJuly 20Y4) URQPHQW % & RQV (www.english-heritage.org.uk/publications/guidelines-andstandards/consultations/). Para 6-8 covers this aspect to some extent, SDUWLFXODUO\ SDUD ZKLFK VWDWHV ³7R DFFRUG ZLWK WK need to undertake an assessment of significance to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected. Local planning authorities will need to be careful only to ask the applicant for what is genuinely needed to satisfy the policy requirement .

Examples of practice in the PCCWM area.

2.16 Due to the age of many heritage sites, their security measures are particularly poor and they are historically difficult to retro-fit modern security measures.

Tyler

the Birmingham area, and would be consistent with the other policies in the plan, in particular PG3.