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Our Ref SP/ADC/14.003
Your Ref A/82/12/

24th March 2014

Mr. P. Cleveland
Planning Department
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Sir

**Re: Planning application A/82/12/
Land to east of Roundstone Lane, Angmering, BN16 4AL
Residential development comprising 139 no. dwellings including 30%
affordable with access, landscaping, open space & associated works**

I write on behalf of Sussex Police, in connection with the above planning application which is currently being considered.

As part of a new initiative, Sussex Police have recently secured dedicated resources to consider strategic growth across the County and implications for policing over the coming years. As part of this initiative, Sussex Police will be actively engaging with local planning authorities on the impact of this growth in terms of infrastructure provision, both through the development management process and proposed local planning policies. This approach has been adopted by other police forces nationally and the commitment to engaging in the local planning process is identified through recent decisions, as detailed below. Please therefore note that this response, and future consultation responses from Sussex Police, will give comment on broader issues than our well established 'Secured by Design' advice provided separately by our Crime Prevention Design Advisors.

Summary

The development of 139 dwellings at land to the east of Roundstone Lane represents an increase in the population of Angmering. Policing is a population based service and this proposed uplift in population would inevitably place demands on existing policing services. The proposed development has therefore been assessed having regard to the implications of the development upon the infrastructure requirements of Sussex Police

and the impact the scheme will have upon the day to day policing of the area. In order to effectively provide the current level of policing to the increased population, developer contributions towards the provision of infrastructure will be required.

The impact on operational requirements has been discussed with the Local District Commander, and Neighborhood Policing Team, and is set out as an assessment against the tests in Regulation 122 below. The following financial contribution has been identified as the necessary and proportionate contribution needed in order to mitigate the impact of this development on the infrastructure of Sussex Police. This infrastructure is critical to the delivery of effective policing and securing safe and sustainable communities.

Sussex Police is therefore seeking a financial contribution of **£ 43, 191.47** (equivalent of £310.73 per dwelling) towards the provision, maintenance and operation of Sussex Police infrastructure to be used in the policing of the local area.

Based upon the priorities set out within the Sussex Police Operational Delivery Plan 2013, and having regard to the amount and types of crime likely to be generated by this development, this contribution would be used towards the following projects:

Automatic Number Plate Recognition Cameras

ANPR Cameras are an increasingly important tool in the prevention and detection of crime, in particular serious offences such as burglary and violent crime. Sussex Police data shows that in the last year, there were 1991 incidents of violent crime and 703 incidents of burglary in the Arun District, which accounts for 37% of all incidents recorded. The increase in population within this District will lead to a likely increase in these crime types, potentially with 438 more incidents of burglary and violent crime alone per year. This therefore necessitates the provision of ANPR cameras to prevent and detect the increase in these crimes.

Given the location of the site on the periphery of the more urban south coast and with easy access to the main A259 and the A280, which connects to the major east west transport route of the A27, it is considered appropriate to seek to install ANPR cameras in close proximity to the proposed site to provide security and an important detection tool for the site and surrounding area. Sussex Police has identified the successful use of ANPR in preventing and detecting crime in peripheral locations such as this, in identifying potential issues and allowing for a quick response to areas that can otherwise be isolated. This is fundamental in areas such as Angmering, as the parish is located directly between police bases at Littlehampton and Worthing on the edge of the Arun District, meaning there is a longer response time for incidents in this locality.

It has also been found that criminals are increasingly targeting new or in progress developments with particular emphasis on the theft of building materials (especially metals) and items such as white goods and other furnishings from already constructed (but empty) units. The provision of ANPR cameras within this vicinity of this site will therefore aid in detection of these crimes during the construction of this development.

Remote IT Facilities

Provision of mobile IT equipment is increasingly being promoted by Sussex Police, in accordance with more efficient working practices set out in the Sussex Police Operational Delivery Plan 2013. This equipment enables officers to connect directly with central IT facilities thus aiding the ability to respond to incidents whilst out on patrol. This is particularly useful in peripheral locations, such as Angmering which is located away from a local police station, where members of the public may find it impractical to visit

police stations to make statements or other such matters. Crucially the provision of these remote IT facilities enables more officers to be out and about, providing a visible police presence, as the mobile IT enables them to remotely carry out tasks that otherwise would have to be undertaken back at a Police station.

Contribution towards provision of a Patrol Car

Even with the use of mobile technology, the increase in the population of Angmering and subsequent increase in crime will necessitate further patrolling of the Angmering area and increased visits by the Neighbourhood Policing Team to investigate incidents of crime. This will include visits to the proposed development to investigate incidents of crime that occur.

The main Neighbourhood Policing Team (comprised of police officers of various rank, as well as PCSO's) are located within Littlehampton, 4 miles away from Angmering and requiring access through a dense suburban area. The proposed development has the potential to accommodate 600 persons, and based upon Sussex Police data, the proposed development alone therefore has the potential to generate an additional 29.4 additional crimes per year. The highest types of crime experienced within the area (acquisition crime, violent crime and burglaries) would also necessitate visits being undertaken to the new development by Sussex Police staff based at Littlehampton. It is therefore considered that the development should contribute towards the infrastructure needed to enable these visits to take place.

The provision of an additional patrol car to service the development would also increase police presence and visibility in the area. This has the dual benefit of deterring crime in the locality, which is particularly important as a deterrent to the high theft from vehicle crime that takes place in Angmering well above the County average (23.9 incidents per 1000 of the population, compared to a County average of 18.9 incidents per 1000 of the population), as well as a deterrent for Anti Social Behavior, which is the highest crime type experienced in the Angmering area (Source, Sussex Police data 2008-2013),.

Due to the impact of the proposed development, the development is therefore expected to contribute towards an additional patrol car for use of the local policing team, based in Littlehampton, to access and serve the site and surrounding area. This patrol car serves the dual purpose of providing an additional vehicle to serve the increased population in this isolated location, as well as enhancing the local police presence to deter specific crime types in this area.

Contribution towards reproviding Littlehampton Police Station

The nature of policing also necessitates a local presence for those residents wishing to interact with or access the force and its staff. Local officers of Sussex Police are therefore available in Neighbourhood Policing Teams (NPT) comprising of police officers and Police Community Support Officers (PCSOs). These teams provide visible, accessible policing to local communities based on geographical areas.

Development proposed within the Arun District will lead to an increase in population wishing to access the Neighbourhood Policing Team, as well as the need for a larger neighbourhood team to respond to increased incidents of crime. Sussex Police data identifies an ambient potential crime increase of 1185 additional crime investigations per year, based on planned development within the District, leading to the need for additional staff and supporting infrastructure to effectively police this growth. This increased level of staff, and the supporting infrastructure, will need to be accommodated within the Littlehampton area in order to continue serving the local community. However, the

existing Littlehampton Police Station is unsuitable, as identified in the Sussex Police Estates Strategy 2013-2018. The local police station is therefore to be reprovided elsewhere in the Littlehampton area.

The proposed development forms part of the wider Arun District growth which will necessitate additional floorspace to accommodate the additional staff and supporting infrastructure required to effectively police this growth. A proportion of the capital costs in relocating the Neighbourhood Policing Team is therefore sought as part of the wider district growth. However, Sussex Police acknowledge that this financial contribution cannot address existing infrastructure deficiencies and the relocated Police Station will continue to serve the existing population, as well as the increased population. Sussex Police are therefore seeking only a contribution towards this relocation to ensure that this infrastructure request remains fair and reasonable. This infrastructure is also related to the proposed development, as the reprovided local police station in Littlehampton will serve future occupiers of the development.

The requested contribution of £ 43, 191 has been calculated on a cost per dwelling basis to ensure that the cost of policing infrastructure associated with new development within the District is fairly apportioned, thus complying with the need to be 'fairly and reasonably related in scale and kind to the development.' The above projects also ensure that the contribution is utilised towards infrastructure that is 'directly related to the development' in terms of location of the infrastructure, and the need for its provision based on the number and types of incidents likely to be generated by this development. The contribution represents a pooled contribution towards infrastructure to serve the site and surrounding area. The pooling of contributions towards infrastructure remains appropriate under the terms of the CIL Regs, up until the relevant Local Authority has adopted CIL, whereby pooling will be limited to 5 S106 Agreements (subject to other regulatory tests).

Principle of seeking contributions towards police infrastructure

It should be noted that the DCLG published a guidance document to accompany the CIL Regulations in May 2011 ("Community Infrastructure Levy – An Overview"). Paragraph 12 of the document expands on paragraph 216 of the Planning Act (2008) which provides a non exhaustive definition of infrastructure that informs the CIL Regulations. Paragraph 12 states;

"This definition allows the levy to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, district heating schemes and police stations and other community safety facilities"

The Localism Act 2011 also changed the definition of infrastructure in relation to the Levy to clarify that the provision, improvement, replacement, operation or maintenance of infrastructure was included. It is therefore contended that the contribution sought towards the provision, maintenance and operation of policing is included within the definition of infrastructure.

Recent appeal decisions have reinforced the acceptance 'in principle' to secure police infrastructure, where justified. The appeal decision at Land north of Bill Crane Way, Lutterworth (Appendix 1) considers this issue in detail at paragraphs 27-31. It is stated:

".....the appellant questioned whether the contribution in respect of policing was compliant with the tests set out in the CIL Regulations. The appellant suggests that there is no evidence that the proposed development would result in a need for increased police resources. It is also argued that there should be no automatic assumption that the

development should bear the cost of the provision of additional policing since the anticipated growth of such costs in this area could have been budgeted for and the new residents will generate Council Tax revenue.

The written evidence submitted by Leicestershire Police detailed the impact the proposed development would have on policing, forecasting the number of potential incidents and the anticipated effect this would have on staffing, accommodation, vehicles and equipment. In view of the requirement of national planning policy to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life, it is considered that, on the evidence before me, a contribution towards policing is necessary to make the development acceptable in planning terms.

Whilst the additional staff, accommodation, vehicles and equipment detailed by the Police could not be regarded as being for the exclusive use of the development, they would be necessary to provide for the effective policing of and to attend incidents on the site. In addition the number of staff and level of resources required to police the development has been based on the number of incidents estimated to be generated by the site. In respect of policing services the UU makes provision for the payment of £426 per dwelling and this is the figure sought by Leicestershire Police. The level and range of the mitigation would therefore appear to be directly related to the development and also to be fairly and reasonably related in scale and kind to it."

A further decision by the Secretary of State at Melton Road, Leicestershire (14th May 2013, ref APP/X2410/A/12/2173673) considered the issue of police funding and contributions in detail at paragraphs 288 to 294. It was determined that each case must be considered on individual merit, having regard to the relevant tests applicable. It was also stated:

"It seems to me that the introduction of additional population and property to an area must have an impact on policing, in the same way as it must on education and library services, for example. Moreover, it also seems to me that the twelfth core planning principle of the Framework, that planning should... "take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs", can only be served if policing is adequate to the additional burdens imposed on it in the same way as any other local public service. The logic of this is inescapable.....Adequate policing is so fundamental to the concept of sustainable communities that I can see no reason, in principle, why it should be excluded from the purview of S106 financial contributions, subject to the relevant tests applicable to other public services."

Notwithstanding this general position, it is noted that each application is considered on a case by case basis having regard to the impact of proposed development and assessment against the tests set out in Regulation 122 of the Regulations. Further justification and compliance with each test, in relation to the development of 139 dwellings at land east of Roundstone Lane, Angmering is as set out.

Regulation 122 of the Community Infrastructure Levy Regulations

1. Necessary to make the proposed development acceptable in planning terms

The creation of safe and accessible environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion is a key part of planning for sustainable development and communities, as outlined in paragraphs 58 (5) and 69 (3) of the National Planning Policy Framework 2012.

The Strategic Objective for Health, Recreation and Leisure in your own Publication Version of the Local Plan 2014 states there is a need to *'Promote strong well integrated and cohesive communities through a safe environment, which delivers an enhanced quality of life to all.'* Policy SD SP1 also confirms a need to *'secure development that will contribute to the social... conditions south of the National Park through to the coast and throughout its settlement.'* The need to contribute to social conditions would include the need for infrastructure provision to provide social services. This is evident by the broad definition of infrastructure in the proposed Plan which is defined as *'The facilities and services needed for a place to function.'* It is contended that the provision of policing is vital for places, and communities, to function.

Saved Policy GEN8 of the Arun Local Plan 2003 states that *'development will not be permitted unless the infrastructure or facilities made necessary by the development are available or will be provided at the appropriate time.'* It is further outlined that *'infrastructure is defined asworks, community facilities and other specific investments for the delivery of services and amenities required by the occupiers of the development.'* It is considered that police infrastructure to provide a safer community, where crime and disorder and the fear of crime do not undermine quality of life or community cohesion, and measures are taken to deter and prevent crime, is a community facility that is essential for the delivery of the police service to new occupiers of the development.

The above national and local policies give policy context to why police infrastructure is necessary to make development acceptable in planning terms.

In terms of why infrastructure is necessary, Sussex Police data identifies a total of 7343 incidents in the Arun District during the last year (2013/2014); the second highest rate within the West Sussex county and equivalent to 49 crimes per 1000 of the population. Based on this data, and an overall housing requirement in the Arun District of 9650 dwellings over the Plan period (an average taken between the dwellings allocated within the South East Plan and proposed Local Plan 2014, the latter of which is pending consideration of a further Strategic Housing Market Assessment) this wider population increase would lead to an ambient potential crime increase of 1185 additional crime investigations per year. This is a significant number of incidents which will require additional police infrastructure, in the form of staff, buildings, vehicles and equipment, to respond to and investigate these crimes, as well as an increased presence to deter crime and anti social activity.

The proposed development forms part of the wider population increase in the Arun District, which will lead to a subsequent increase in incidents and crime. The proposed development of 139 dwellings, with the housing mix proposed, would lead to an estimated population increase of 600 persons. This is over an 8% increase on the existing population in this isolated location between two police stations and could result in 29.4 additional crimes being investigated a year in connection with this development alone. Based on crime types within the Angmering parish, Sussex Police data (2008-2013) identifies that this increased crime is likely to include a high rate of anti social behaviour, criminal damage and theft as the most frequent incident types. The incidents of Theft from Vehicles is also likely to be significant as it is a crime type already experienced above the District average with 23.9 incidents per 1000 of the population, compared to 19.8 as the Arun average. This crime type will become more frequent in the Parish due to the increase in population proposed as part of this development.

The parish of Angmering is currently policed by one Police Community Support Officer and one Sergeant, neither of which are dedicated to serve the Angmering area alone. These officers are also located within Littlehampton, and not within the local Angmering area or immediate reach of the site. The existing police infrastructure is therefore unable

to effectively police the increased growth within the area and the increased crime levels associated with the development. The proposed uplift in population, and resultant increase in incidents, would place an additional burden on this local policing which cannot be addressed without financial contributions to provide infrastructure. The financial contribution identified is therefore sought to be used on police infrastructure that will mitigate this and enable effective policing of the new development. The provision of an additional patrol car enables more resources for officers to reach the site should an incident occur, with the provision of remote IT facilities enabling more officer time to be spent within the local area which is isolated from the local police station at Littlehampton. This additional time in the vicinity of the site also has the dual benefit of deterring crime types that will increase in the local area, specifically incidents of Anti Social Behaviour, criminal damage and vehicle thefts; all of which are the highest crime types in the Angmering Parish. The provision of ANPR cameras will also assist in the investigation of these latter more serious crime types that are evidenced to be a more frequent occurrence in the area. A proportionate contribution towards the additional floorspace to accommodate the additional staff and supporting infrastructure required as result of growth in the District also ensures that the larger Neighbourhood Policing Team are suitably accommodated to continue providing a local police station facility for use of new residents associated with the development.

There is no dedicated Government funding to comprehensively cover the capital costs associated with policing new development. Allocated government funding is utilised to fund day to day policing requirements, maintenance and revenue; all focussed on maintaining the existing policing operations rather than providing sufficient funds to provide the necessary infrastructure to serve an increased population and associated increased incident levels. These challenges of funding are similar to those faced by other government bodies and Council Tax Precept beneficiaries such as County Councils. However, as is similar with County Councils, unless contributions from developments are secured, these developments fail to mitigate against the impacts caused. Without developer contributions, Sussex Police would be unable to maintain the current levels of policing with resources diverted and stretched, inevitably leading to increased incidents of crime and disorder within the local area. The development would therefore fail to provide a safe environment where crime and disorder, and the fear of crime do not undermine the quality of life, as required by national planning policy.

The contributions sought are therefore necessary to make the development acceptable in planning terms and to ensure development is in line with the wider objectives of sustainable development as set out in national and local planning policy. The contribution sought is also necessary based on the evidence of existing crime levels and types, and the impact on police infrastructure, in the local area; which forms part of the future challenges of policing an increased population in the Arun District as a whole.

2. Directly related to the proposed development

There is a functional link between the new development and the contributions requested. Put simply, without the development taking place and the subsequent population growth there would be no requirement for the additional infrastructure. The additional population growth will lead to an increase in incidents, which will require a Police response.

To reiterate the information above, the proposed development will contribute to the wider population increase in the Arun District which is likely to result in an ambient potential crime increase of 1185 additional crime investigations per year. The proposed development of 139 dwellings, with the housing mix detailed, would lead to an estimated population increase of 600 persons and a potential 29.4 crimes per year in connection with this development alone. Whilst this may be considered a small scale increase on

existing crime levels, it is the cumulative impact of developments in the District that will place an increased burden on local policing. All development within the District is therefore expected to contribute towards the additional police infrastructure needed to address this increase in crime directly related to the increase in population.

The contribution sought is directly related to the proposed development as the amount identified will be used to fund infrastructure specifically needed to deal with the likely form, scale and intensity of incidents that the development will generate, as detailed in full above. To reiterate, Sussex Police data identifies a high level of theft from vehicles within the Angmering parish, with 23.9 incidents per 1000 of the population, compared to 19.8 as the Arun average. This crime rate is likely to increase as a result of the development, thus the proposed ANPR cameras will specifically aid in the investigation of these crimes. The additional 29.4 crimes per year resulting from this development will also require police visits to the development, thus a contribution to the additional patrol car enables these visits to take place in this periphery location, away from the local police stations of Littlehampton and Worthing. The provision of remote IT facilities also enables more officer time to be spent within this peripheral location, with the dual benefit of deterring crime types that are specifically evident in the local area; particularly aiding in deterring incidents of Anti Social Behaviour, criminal damage and vehicle thefts, all of which are the highest crime types in the Angmering Parish. A proportionate contribution towards the additional floorspace to accommodate the additional staff and supporting infrastructure required as result of growth in the District also ensures that the larger Neighbourhood Policing Team are suitably accommodated to continue providing a local police station facility for use of new residents associated with the development.

The evidence above identifies that Angmering is likely to see an increase in crime due to the increased population related to this development. Sussex Police evidence suggests that this is likely to include a high percentage of criminal damage, theft from vehicles, burglaries, and incidents of anti social behaviour. The contribution sought will therefore be used to fund infrastructure specifically needed to deal with these incident types that the development will generate.

3. Fairly and reasonably related in scale and kind to the proposed development.

The developer contribution sought is proposed to help achieve a proportionate increase in police infrastructure to enable Sussex Police to maintain its current level of service in the Angmering area. The contribution will fund the provision of necessary infrastructure that has been identified by the Local District Commander as necessary to provide an appropriate level of policing to serve the proposed development and maintain an appropriate level of community safety.

The financial contribution sought is based upon a cost per dwelling, calculated based on crime rates and population data available and Sussex Police costs for providing a comprehensive policing service. This infrastructure cost is then divided between anticipated housing and population increase, based upon development identified within Local Plans over the plan period. This ensures a proportionate approach is taken to development and the amount sought is fair and reasonable.

The projects identified set out what this contribution may be spent on in order to effectively police the development proposed. The contribution is defined as being used 'towards the provision, maintenance and operation of Sussex Police infrastructure used in the policing of the local area' to ensure that the contribution will be used in the policing needed in connection with this development only, assuring that the contribution is directly and reasonably related to this development.

I trust that the above adequately justifies why Sussex Police request a contribution towards police infrastructure in order to mitigate against the impact of the development, and how CIL compliance is achieved. I therefore trust that the Sussex Police contribution of £ 43, 191.47 can be secured through Section 106 legal agreement, should planning permission be granted. Without this contribution, Sussex Police would object to this development.

For clarification this response is solely linked to the impact of the development upon Sussex Police infrastructure requirements. You may receive a separate response from Sussex Police Crime Prevention Design Adviser, relating to detailed matters of the design and layout of the proposals.

Should you, or the applicant, require any clarification in respect of this submission or wish to discuss any details further, please do not hesitate to contact me.

Yours sincerely

Samantha Prior
BA (Hons), MSc, MRTPI
Joint Commercial Planning Manager
Sussex and Surrey Police

cc Chief Inspector Adrienne Taylor, Arun District Commander
Inspector Marc Clothier, Neighbourhood Policing Team
Phillip Edwards, Crime Prevention Design Adviser