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Our Ref 17.002
Your Ref P/140/16/OUT

7th February 2017

Claire Potts
Planning Department
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Dear Ms Potts,

Proposed outline application for access only - mixed use development comprising of up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route & other community uses including public open space & allotments with some matters reserved.

I write on behalf of Sussex Police with regard to the planning application P/140/16/OUT which seeks to deliver 400 homes on the land South of Summer Lane West of Pagham Road, Pagham.

Sussex and Surrey Police have been working proactively with a number of Local Authorities outlining our infrastructure needs for relevant development plan periods. We have recently updated our methodology for our infrastructure requests to provide clarity and up to date details of our current infrastructure capacity. The additional information I now provide has previously been used only as background information however will now be included with all future funding requests submitted by Sussex and Surrey Police.

Our new methodology has been developed through a joint partnership by Leicestershire and Thames Valley Police and is a Community Infrastructure Levy compliant as considered by Ian Dove QC. There are recent appeal decisions in favour of Police contributions and High Court judgements supporting this methodology which I attach. I will go into further detail on the various items of infrastructure and provide evidence of their compliance with Regulation 122 tests.

The additional population generated by this development will inevitably place an increased demand upon the existing level of policing for the area. In the absence of developer contributions towards the provision of additional infrastructure, Sussex Police would be unable to retain the high level of policing that is currently delivered in the Arun area and would therefore OBJECT to the development proposed.

1. Overview of Financing Arrangements

Police Forces are funded by similar if not identical Central Government methods used to agree funding for all Local Authorities or other public services. The funding allocated to Police Forces via Home Office grants, the Council Tax precept and other specific limited grants is insufficient to fund in full requests for capital expenditure. Capital programmes are funded generally from a mixture of asset disposal (a finite option), redirection of revenue funding (with implications for operational policing), general capital grants or general reserves and prudential borrowing. Prudential borrowing is not a nil cost option, with any borrowing required to be repaid from revenue/income; repayments from this source having implications for the delivery of operational policing in a similar vein to redirection of revenue funding.

Funding settlements for the Police are determined in accordance with the current funding formulae which incorporates a number of criteria including historical population forecasts. Accordingly there is a lag between the level of revenue funding potentially available and the population to be policed.

The Government continues to provide annual Capital Grant to Forces which in the case of Sussex for 2016/17 and 2017/18 funds 5% of the capital programme in any one year. The majority of Forces fund the balance of their capital expenditure either through PFI arrangements or Prudential Code borrowing. Although PFI continues to be used by some Forces it is a diminishing resource with various shortcomings.

Police funding is divided into revenue and capital funding. The revenue funding stream relates broadly to the day-to-day running costs of the Force, that is the payment and management of staff, the ongoing costs relating to running and maintaining buildings and equipment and repayment of loans used to fund capital projects. The capital funding stream relates to the provision of additional buildings, information technology, vehicles, equipment and other infrastructure items required for assets including; existing police services and increased pressures and requirements placed on the Force as a consequence of growth in demand for services. Funding received by the Police via the Council Tax precept is generally used for revenue purposes and is not directed towards capital projects/programmes on the basis that directing funds towards such projects would diminish that available for the delivery of front line policing services.

The Police Crime Commissioner holds a shared responsibility with the Chief Constable for providing effective financial and budget planning for the short, medium and longer term. In consultation with the Chief Constable, the PCC is required to set a budget for the forthcoming year. However, the pressure on revenue funding is such that it is extremely unlikely that it could be made available to finance significant capital projects; in practical terms the revenue budget is insufficient to fund infrastructure projects.

It should also be noted that even with revenue raised from the Council Tax precept there has been a recognised funding gap created by inflation and a continuing expansion of the role of the Police service and the demands placed upon it. While there has been investment from central Government, this is often ring-fenced for particular initiatives and has not kept up with the demand for services. This means that Police Forces need increases in the Council Tax precept simply to 'stand still' in terms of costs of service provision. It is not possible to raise sufficient Council Tax precept to cover all inflationary increases and other costs pressures. A £5 (3.4%) increase in Council Tax precept to the Police has been approved for the 2016/17 budget however any increase of over 5% requires approval at referendum.

Therefore the funding gap is likely to increase, with less money for revenue spending, let alone capital projects. At the same time Police Forces suffered reductions in the level of the annual Police Grant (revenue) and Capital grants. As shown in table 3 (Revenue and Capital Budget 2016/17) Sussex Police were required to deliver £35 million in savings over 4 years which will limit capital funding for new infrastructure requirements.

TABLE 3: Estimated Annual Savings to 2019/20

	2016/17 £'000	2017/18 £'000	2018/19 £'000	2019/20 £'000	Total £'000
Savings Requirement	11,753	8,481	7,418	7,527	35,179

The Financial Summary for the draft Sussex Police Revenue Budget and Capital Programme for 2016/17 is set out below:

Draft Revenue Budget 2016/17

Appendix A

Total Non-Pay includes the following (although is not limited to):

- Buildings and Premises:
 - Repairs and maintenance of premises
 - Energy costs and water services
 - Utilities
 - Rent and service charges
 - Business Rates
 - Contract cleaning
 - Buildings and property insurance
- Transport
 - Vehicle service, maintenance and repairs
 - Vehicle fuel
 - Vehicle hire charges
 - Essential/casual car user costs
 - Travel expenses
 - Transport insurance
- Supplies and Services
 - Printing & stationery
 - Office Furniture and materials
 - Catering contracts
 - Clothing and uniform
 - Outsourced custody costs
 - Forensic costs
 - Investigation costs
 - Interpreters / translators / doctors
 - Telecommunications
 - Radios and airwave
 - Communications and computing
 - Specialist operational equipment
 - Operational expenses
 - Court and legal costs
 - Subscriptions and licences
 - Consultancy fees
 - Bank charges
 - Audit fees
 - Accommodation
 - Subsistence
- Third Party Payments
 - Payments to government bodies and agencies
 - Collaboration payments
 - PNC / PND costs (police national computer / database)
 - Third party insurance costs
 - NPAS (National Police Air Service)

Expend Area	£ 000
Employees	
Police Officer pay	125,223
Overtime	4,706
Pension Employers Contribution	26,288
Total Police Pay	156,216
Police Staff Pay	67,267
Police Staff Pension Deficit	1,233
PCSO Pay	9,668
Total Police Staff Pay	77,168
Other Employee Costs	1,533
Ill Health Pensions	2,855
Total Pay Costs	4,389
Buildings And Premises	9,508
Transport Costs	5,375
Supplies and Services	38,327
Total Non Pay	53,210
Gross Operational Delivery Budget	250,982
Fees, Charges & Specific Grants Income	(33,720)
Net Operational Delivery Budget (before savings)	257,262
Savings Requirement	(11,753)
Net Operational Delivery Budget	245,509
Office of PCC Budget	1,243
Community, Victims & Restorative Justice	3,132
Grant Income (Victims & Restorative Justice)	(1,498)
Financial Provisions & Reserve Transfers	3,093
Total PCC retained Budget	4,970
Total Police Fund	250,479
Financed by :	
Police Grant	97,828
Ex DCLG Grant	53,893
Council Tax Support Grants	13,202
Collection Fund Surplus/(Deficit)	0
Precept	85,557
Total Financing	250,479

Council tax precept

2. Proposed Capital and Investment Budget

Proposed Capital and Investment Programme and Financing

	2016/17 £'000	2017/18 £'000	2018/19 £'000	2019/20 £'000	Total £'000
Home Office Capital Grant	1,068	1,068	1,068	1,068	4,272
Revenue Contribution	2,517	2,025	2,025	2,117	8,684
Reserves and Receipts	23,229	11,854	7,957	2,850	45,890
Total Capital and Investment Programme	26,814	14,947	11,050	6,035	58,846

The capital and investment plans to 2020 require no additional borrowing but subject to assumptions on the profile of delivery of the programme and achievement of the capital receipts, the capital and investment reserves will be nearly exhausted by 2020, i.e. there is limited headroom for further new investment requirements. These could be significant in relation to new Emergency Services Network, further phases of ICT Infrastructure and enablement project, Digitalisation of Policing Services and Criminal Justice. The reducing level of investment reserves over the four year period means prioritisation of capital schemes may have to be reviewed and the current approach of not borrowing may have to be revisited before 2020 and/or provision made in revenue budget for financing of capital investment. The safe policing of new urban extensions depends on having revenue capacity to employ front line staff, which would compete with the need to provide the essential infrastructure outlined in this request.

3. Assessment and Request

Sussex Police has undertaken an assessment of the implications of growth and the delivery of housing upon the policing of the Arun District and in particular the major settlements in the district where new development is being directed towards. We have established that in order to maintain the current level of policing developer contributions towards the provision of capital infrastructure will be required. This information is disclosed to secure essential developer contributions and acknowledgment as a fundamental requirement to the sound planning of the District.

The additional population generated by the development will inevitably place an additional demand upon the existing level of policing for the area. In the absence of a developer contributions towards the provision of additional policing infrastructure the additional strain placed on our resources would have a detrimental impact on Forcewide policing.

The funding request will now provide the most recent annual statistics for crime/incidents in Arun which will be compared to the number of existing households. This provides an incident per existing household within Arun which can then be used as the background to the various items of infrastructure outlined in this funding request.

Firstly, I would also highlight a recent appeal decision for a scheme in Benson (APP/Q3115/A/14/2222595). In their assessment of the requests submitted for developer contributions, the Inspector commented (paras 51 - 52)

51. The necessity, relevance and proportionality of these and the other elements of the planning agreement are set out in three documents submitted to the Inquiry. They (include)... a letter from Simon Dackombe Strategic Planner, Thames Valley Police. With one exception these provide convincing (and undisputed) evidence that the obligations comply with regulation 122 of the CIL regulations.

52. The exception is that part of the contribution sought for policing which relates to the training of officers and staff. Whereas all the other specified items of expenditure relate to capital items which would enure for the benefit of the development, staff training would provide qualifications to the staff concerned and would benefit them but these would be lost if they were to leave the employ of the police and so are not an item

related to the development. I therefore take no account of this particular item in coming to a decision on the appeal. This does not, however, invalidate the signed agreement.

The Police regularly take legal advice and guidance from industry professionals on the applicability of NPPF tests relating to the application of Regulation 122 on our funding requests for S106 agreements and Infrastructure Development Plans. This included advice as to what is infrastructure.

- Infrastructure is not a narrowly defined term and the definition in the Planning Act 2008 provides a non exhaustive list to the extent that there is no difficulty in the proposition that contributions towards Police infrastructure can be within the definition.
- Infrastructure is not limited to buildings and could include equipment such as vehicles, communications technology, and surveillance infrastructure such as CCTV.

The submission set out below is based on the same methodology put before, and accepted by the Inspector above, in line with the Inspectors comment requests for contributions towards training have now been omitted.

4. Current Policing requirements in Arun

The recorded incidents in Arun account for a total of 8.8% of incidents Sussex Police currently attend per year in the County. There are 55,112 calls to the non-emergency switchboard in Arun and 40,800 are transferred to the non-emergency contact center. A total of 17,611 calls are received directly to the emergency assistance number (999) per year in Arun.

The 2011 census listed 66,700 households in the Arun District and taking into account net completions since this has increased by approximately 2662 (AMR 2014/15). There is no 2015/16 AMR available therefore the average completions per year (504) has been used for 2015/16.

The 2011 census listed the population of Arun as 149,518 which represented an average household consisting of 2.24 persons.

At present 69,362 households / 155,370 persons generates an annual total of 44,563 incidents per year that require a Police action. These are not necessarily all "crimes" but are calls to our contact centre which in turn all require a Police response/action. Effectively therefore placing a demand on resources. It should be noted that the total number of crimes recorded in this period was 8,525 which is only 19% of all the recorded incidents. Taking into account the number of recorded incidents and current number of households this results in 0.642 incidents per household and 0.287 incidents per person that require police attendance in Arun each year.

5. Breakdown of predicted incidents as a result of population increase in Arun

The proposed development of 400 units would have an approximate population of 896 people (at 2.24 persons per household). Applying the current ratio of "incidents" to population then the development would generate an additional 257 incidents per year for Sussex Police to attend (0.287×896).

In total the Local Authority of Arun is served by; (all figures = FTE)

- 102 Uniformed Officers broken down as follows:
 - 6 NRT
 - 2 Staff
 - 75 NPT
 - 4 Police Enquiry officers
 - 17 NPT (PCSO)
- 5 Dedicated support staff

The West Sussex division has 619 officers (SOCO, Forensics, Major Crime Unit) which cover the region (this excludes the 102 dedicated officers listed above. Recorded incidents in Arun amount to 20.3% of incidents in West Sussex therefore it is reasonable to allocate divisional 125.6 officers to the Arun District.

- 125.6 Divisional officers

Central staffing provision is provided and drawn upon when required. I have included the major support staff departments of Communications, Human Resources and Shared Business Services, which are all services provided force wide. There are 685 support staff in these three departments. Again utilising the ratio of incidents in the County (8.8%), 60 support staff are required to support the existing population of Arun.

- 65 Support Staff

Currently 44,563 incidents are attended by 227.6 officers per year in Arun which is a ratio of 195.8 incidents per officer, per year. To retain this current ratio of 199.8 incidents per officer per year, an additional 257 incidents per year would require 1.3 additional officers. The expected incidents generated by this development amount to 1.3 of a FTE police officers workload.

Additional officers/staff required as a result of 400 additional houses

Total Additional Officers Required	1.3	160 (expected No. incidents arising from development) / 195.8 (No. incidents attended per year by an officer)
Total Additional Support Staff (Local/Central)	0.4	Existing ratio of support staff / police officers

6. COSTS

In order to mitigate against the impact of growth Sussex Police have calculated that the "cost" of policing new growth in the area equates to **£61,361.40** to fund the future purchase of infrastructure to serve the proposed development. This cost will now be broken down clearly to show the capital infrastructure required to support these new officers.

The contribution represents a pooled contribution towards the provision of new infrastructure to serve the site and surrounding area. The pooling of contributions towards infrastructure remains appropriate under the terms of the CIL Regs, provided this does not exceed 5 separate contributions and subject to other regulatory tests.

The contribution requested will fund, in part, the following items of essential infrastructure and is broken down as follows;

The contribution will mitigate against the additional impacts of new housing development in Arun because our existing infrastructures do not have the capacity to meet these and because like some other services we do not have the funding ability to respond to growth.

The contribution requested will fund, in part, the following items of essential infrastructure and is broken down as follows;

STAFF SET UP

The basic set up costs of equipping and training of staff;

OFFICER/PCSO			
Uniform	£873	1.3	£1134.90
Radio	£525	1.3	£682.50
Workstation/Office Equip	£1508	(1508)*1.3	£1960.40
Police Staff			
Workstation/Office Equip	£1508	0.4	£603.20
TOTAL COST			£4381

Sussex Police would utilise the contribution in the following manner;

- **£2906** towards the full cost of an additional officer to work in the Pagham and Rose Green Neighbourhood Policing Team.
- **£871.80** as 1 of 5 pooled payments towards the costs of an additional officer to work in the Pagham and Rose Green Neighbourhood Policing Team.
- **£603.20** as 1 of 5 pooled payments towards the cost of 1 additional support staff member to be based at Bognor Regis Police station.

It should be noted that these are necessary start-up capital costs incurred by Sussex Police to officers and staff to undertaking their role. The Planning Inspector in the attached appeal (APP/Q3115/A/14/222595) considered these start-up costs were comply with regulation 122 of the CIL regulations and necessary infrastructure for policing.

PREMISES

At present policing within the Pagham and Rose Green Neighbourhood Policing Team is delivered from premises in Bognor Regis. As outlined in the Police Crime Commissioners Estate Strategy 2013-2018 Bognor Regis Police Station is shown to be retained.

At present Sussex Police maintain a high capacity of accommodation for staff and officers, with any additional capacity delivered via new works to provide floor space. Each new officer/member of staff is allocated 16.88sqm of floor space (workstation, storage, locker room etc). This development requires 1.3 additional officers to maintain the existing level of policing in the District. The additional officer would be based at Bognor through the adaption/conversion of existing floor space. The cost of sitting this officers would be **£35,110.40** (£1600 x 16.88 x 1.3). The figure of £1600 is derived cost of adaptation/new build (Sussex Police operate an estate policy of delivering new accommodation principally through the adaptation of existing buildings as opposed to new build at a 80:20 ratio.

VEHICLES

A vital part of providing effective policing to the residents of Arun is maintaining the large fleet of vehicles. The three year pro rata lifetime cost of a standard vehicle is;

Patrol Vehicle – £31,680

Current fleet deployment within the Arun administrative area (serving 69,362 households) currently consists of 27 vehicles.

This equates to a cost of £12.33 (£31,680*27) / 69,362 per household. Accordingly therefore in order to maintain the existing level of fleet provision the development would generate a required contribution of **£4,932** (12.33 x 400)

- **£4,932** as 1 of 5 pooled payments towards the purchase of an additional vehicle for use by the Pagham and Rose Green Neighbourhood Policing Team.

Current fleet deployment within the Arun administrative area (serving 69,362 households) is broken down into the following departments (Neighbourhood Response Teams, Local Supports Teams, Crime Management, Neighbourhood Police Team, and Local Command).

MOBILE IT / DATA TERMINAL

Provision of mobile IT capacity to enable officers to undertake tasks whilst out of the office, thus maintaining a visible presence. Cost of each item - **£1,950**, therefore for this development (which generates 5 additional uniformed officers, the cost would be **£1,950 (1500 x 1.3)**.

- This payment would be used for the purchase of 1 additional Mobile IT kit for officers working within the Pagham and Rose Green Neighbourhood Policing Team.
- **£450** as 1 of 5 pooled payments towards the purchase of an additional Mobile IT kit for officers working within the Pagham and Rose Green Neighbourhood Policing Team.

ANPR CAMERAS

Automatic Number Plate Recognition (ANPR) Cameras – Sussex Police would recommend a roll out ANPR Cameras throughout the area. There is a limited budget for this at present but a requirement to roll out more cameras. The number and location of cameras is driven by the scale and location of the proposed development and the road network in the area. Current coverage in Arun is limited. An assessment based on the significant planned growth within Arun District has been undertaken and it has been assessed that there is a requirement for additional ANPR camera coverage in the area to mitigate the impact of planned growth. Each camera is costed below, and requirement is assessed on the basis of the scale, location, and proximity to the road network of the proposed development. Operationally it has been determined that this development should support the contribution of **£13,000** towards the provision of ANPR in the area.

£13,000 to provide a fixed Site ANPR camera, intelligent dual lane reading Vector camera with **no** infrastructure in place for single carriageway

The precise location will be determined with regard to operational requirements. Sussex Police are happy to confidentially share this information with the Council regarding the precise location in due course.

RADIO COVER/CAPACITY

It is necessary to expand the capacity of our existing system to cater for additional calls as a result of the development. The development will increase the use of our radio system which is maintained at existing capacity by investing in additional hardware including servers, system refinement signal strengthening and improved transmission technologies. We spend £30,000 pa adding such capacity to the existing system in Arun which serves 69,362 households. Annual cost of these capacity increases to an existing household is £0.43. Capacity improvements will be undertaken annually and without these the system will fail to adequately carry both existing and additional calls as a result of this additional development. The additional cost of the additional capacity in relation to houses in this development will be **£172**.

The impact of the development on Policing with reduced Airwaves capacity will be increased attendance times, delays in message passing and the implications of this for attendance and apprehension. Occupiers and those that represent them will expect existing performance and attendance levels to be maintained.

CONTROL ROOM TELEPHONY

There are 55,112 calls to the non-emergency switchboard in Arun and 40,800 to the non-emergency contact center. A total of 17,611 calls are received directly to the emergency assistance number (999) per year in Arun. An additional 400 homes would generate an additional 198 calls per year to the non-emergency switchboard.

Police control room call handling equipment is used to capacity at peak times. Our call handling centre at Force HQ Lewes directs all calls and deploys resources to respond and continue monitoring. We know the capacity of the technology and the calls it currently handles [fixed around minimum times with callers] and will be expected to handle as a result of the proposed development. In order to deal with additional calls as a result of additional planned development across our sub region additional telephony, lines, licenses, workstations and monitoring screens will be required. This development would provide 400 additional houses. An approximate cost of maintaining this network is estimated at £4.54 per dwelling therefore this development should contribute **£1,816** towards the additional equipment needed to answer the additional calls.

Police preference is to use this money when the existing telephony is extended and renewed in 2018 however this does not prevent procurement of additional capacity in the meantime as a result of the impact of this development. There will be a call handling impact and delays in response times if we attempt to serve this development with our current telephony systems.

7. Compliance with National Policy and CIL 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 fundamental to planning for sustainable development as confirmed in the National Planning Policy Framework.

Aruns publication version of the emerging Local Plan (2011-31) states that "In general, Arun is a relatively safe place with low incidence of crime, although fear of crime remains a significant issue which is highlighted in the Sustainable Community Strategy. Crime rates are relatively high in parts of Bognor Regis and Littlehampton, with part of River Ward, Littlehampton ranked within the worst 10% areas in England, and a number of other areas within Littlehampton and Bognor Regis falling within the worst 20%".

Policy DM1 (Aspects of form and design quality) lists 'Crime prevention' as the 6th consideration for new development proposals. When considering any application for development the Council will have regard to the following aspects:

6. Crime prevention

Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating building and play areas along public routes and spaces, and making a clear division between private and public land to foster a mutual protection for the territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'New Homes 2010 – Secured by Design' and the 'Safer Places – The Planning System and Crime Prevention'.

There is no dedicated Government funding to comprehensively cover the capital costs associated with policing the associated new development. Unless contributions from developments are secured then 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.

Developer contributions are therefore necessary to ensure development is in line with the wider objectives of sustainable development as set out in national and local planning policy. Sussex Police strive to reduce the

level of crime in the County however due to the significant numbers of new housing being brought forward the need for more front line staff and associated infrastructure has never been more relevant as a fundamental planning policy consideration.

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.

The infrastructure identified above has been specifically identified as infrastructure required to deal with the likely form, scale and intensity of incidents that the development will generate.

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

The proposed developer contribution is proposed to help achieve a proportionate increase in police infrastructure to enable Sussex Police to maintain its current level of service in the area. As stated the contribution would assist in the provision of necessary infrastructure which has been identified by the Chief Inspector as necessary to provide an appropriate level of policing to serve the proposed development and maintain an appropriate level of community safety.

The level of crime in Yapton is no lower than other areas in Arun therefore any arguments that this area has a lower crime rate than other areas of the District would be incorrect. The attached crime maps of Yapton listed 83 recorded crimes in November 2016. Taking into account that only 19% of incidents are recorded as crimes in Arun this would amount to approximately 436 incidents occurring in Yapton per month. Police incident records show 44,563 incidents required police attention in Arun over 2014/15, an average of 3713 per month.

The 2011 census listed the population of Yapton as 5,926 persons and a total of 149,518 persons for the whole District. Not taking into account recent growth Yapton then accounted for approximately 4% of Aruns total population however now accounts for approximately 11.7% of recorded incidents in the District (using November 2016 as an example). This clearly shows that the crime rate in Yapton is notably higher than other neighbourhoods in the Arun District.

I would also highlight two recent appeal decisions in Leicestershire (APP/F2415/A/12/2179844 & APP/X2410/A12/2173673, Enclosed). In assessing the request from Leicestershire police for developer contributions towards infrastructure the Inspector commented at **para 29** of decision 2179844;

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.

Furthermore with regard to appeal decision 2173673, the Inspector is unequivocal in highlighting the acceptability of police contributions being recipients of developer's contributions;

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. There is no reason, it seems to me why police equipment and other items of capital expenditure necessitated by additional development should not be so funded, alongside, for example, additional classrooms and stock and equipment for libraries.

Para 292

These appeal decisions confirms that the approach of Sussex Police in assessing the impact of development, having regard to an assessment of the potential number of incidents generated by growth is appropriate, and fundamentally it confirms that police infrastructure should be subject to developer contributions as the provision of adequate policing is fundamental to the provision of sustainable development.

Furthermore the requirement to ensure that Crime and the fear of crime is addressed through the planning process runs through the NPPF;

Paragraph 17 sets out the core planning principles and states that planning should, inter alia:

"...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"

Paragraph 58 states that local and neighbourhood plans policies should aim to ensure that developments, inter alia;

"create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion"

Paragraph 69 sets out the role of the planning system in facilitating social interaction and creating healthy, inclusive communities and states that planning policies and decisions should aim to achieve places which promote;

"safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion"

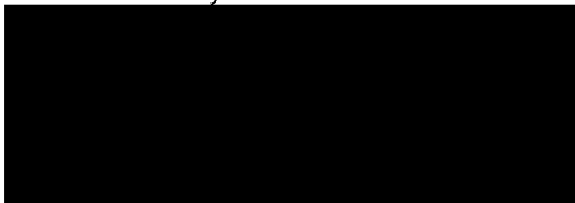
Paragraph 156 states that local planning authorities should set out strategic priorities in the Local Plan to deliver;

"...the provision of health, security, community and cultural infrastructure and other local facilities..."

I trust this sets out sufficiently Sussex Polices' request for infrastructure contributions relating to this development of 400 homes in Yapton.

I am more than happy to discuss the content of this submission with yourselves.

Yours sincerely



Andrew Taylor
BA (Hons), MSc, MRTPI
Joint Commercial Planning Manager
Sussex and Surrey Police

Part A

'What', 'where' and 'when' of infrastructure requirements to relevant to application reference P/140/16/OUT

TOPIC	INFRASTRUCTURE REQUIREMENT	AREA	LEVEL OF PRIORITY (CRITICAL / NECESSARY / PREFERRED)	TIMING OF DELIVERY			COST	INDICATIVE FUNDING GAP
				SHORT TERM (2017-2020)	MEDIUM TERM (2021-2028)	LONG TERM (2029 ONWARDS)		
Policing	Radios	Pagham	Necessary	x	x		£682.50 (£525 x 1.3)	£682.50
	Workstation/ Office Equipment for Police Officers	Pagham	Necessary	x	x		£1960.40 (1508) x 1.3)	£1960.40
	Workstation/Office Equipment for Police Staff	Pagham	Necessary	x	x		£603.20 (£1508 x 0.4)	£603.20
	Uniform	Pagham	Necessary	x	x		£1134.90 (£873 x 1.3)	£1134.90
	Adaption/improvements to Bognor Police Station	Bognor Regis	Critical	x	x		£35,110.40 (1600 x 16.88 x 1.3)	£35,110.40
	Pooled payment towards contribution for an additional patrol vehicle	Pagham	Necessary		x	x	£4,932 (£31,680/27) / 69.362)) * 400	£4,932
	Mobile IT / Data Terminal	Pagham	Necessary	x			£1950 (£1500 x 1.3)	£1950
	Fixed Site ANPR camera - single carriageway (infrastructure in place)	Pagham	Necessary		x		£13,000 (1 x £13,000)	£13,000

Radio Cover Capacity	Pagham	Critical	x	x	£172	£172
Control Room Telephony	Pagham	Critical	x	x	£1,816	£1,816
TOTAL						£61,361.40

Enc.