

Mr A Taylor

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5th April 2018

Ref: AR/32659

Dear Mr Taylor

Planning Application at Bilsham Road, Yapton (Ref: Y/91/17/OUT)

I write on behalf of my client Gleeson Strategic Land (GSL) with regard to the above planning application for the construction of up to 250 new homes on land at Bilsham Road, Yapton, further to your representations to Arun District Council dated 6th February 2018.

I am aware that you have been in recent correspondence with Jackson Planning on behalf of Landlink Estates, who have a current application for up to 300 homes on land at Drove Lane, Yapton (Ref: Y/92/17/OUT). The two sites / applications together make up strategic allocation SD7 in the emerging Arun Local Plan, and the promoters and consultants are working together closely.

For simplicity we do not propose to repeat the case advanced in detail by Jackson Planning in their letters to you of 21st March and 27th March 2018. However, to be clear, we endorse the position they have advanced.

GSL, like Landlink Estates, is willing to pay fair, reasonable and justified Section 106 contributions. However, for the reasons set out in detail in the letters from Jackson Planning, and summarised here, we do not consider that the costs as expressed in your letter of 6th February 2018 meet the tests set out in the CIL Regulations given the specifics of this site / application.

We clarify the relevant key issues and calculations for our site / application below.

London

Birmingham

Manchester

Thames Valley

Police 'Need' / Crime Rates in Yapton

Figures you provided to Landlink Estates (at Appendix 5 of your letter dated 23rd March 2018) identify that on average over the least 3 years, Yapton displays a crime rate that represents **77% of the crime rate for Arun District**. There is no evidence of which we are aware to suggest that rates would be any different moving forward. This is therefore the ratio that should be applied to the various calculations (see below).

Precise Adjustments to Yapton

The population likely to be created by our proposed development is 560 persons based on calculations you accept (250 homes x an assumed 2.24 persons per home). At your assumed rate of 0.26 incidents per person based on District-wide incident rates, this would give **112 incidents a year** ($560 \times 0.26 \times 0.77$).

Police Officer and Support Staff

Using your metric that 185 incidents equates to the workload of one officer, 112 incidents from this development would equate to **0.6 of an officer's workload** ($112/185$).

The same principle must apply to support staff where you identify a general need for one member of support staff per 617 households. This development would, therefore, create a need for an additional **0.31 support staff** ($250/617 \times 0.77$).

Premises

You have agreed a revised methodology for calculating premises costs in your letter to Landlink Estates dated 23rd March 2018. Adopting that methodology, but applying the lower number of officers/staff generated by this development (our proposals are for 250 homes rather than 300 homes) creates a requirement for a total of 0.91 officers / staff (0.6 officers and 0.31 support staff) x 8.93sqm per person x £1,561 per sqm = **£12,685.15**.

Vehicles

You have identified that the average capital cost for a police vehicle is £17,000 and that there are 71 vehicles – a total cost of £1,207,000. You have also identified that there are 221 officers in Arun District. This gives a per officer vehicle value of £5,462. Based on the identified requirement for 0.6 of an officer, the appropriate cost in this regard would be **£3,277.20**

APNR

We note that you recently accepted that the appropriate contribution from Landlink Estates, based upon the scale of their development (300 homes) and associated traffic impacts, was £405. Although our development is slightly smaller than that proposed by Landlink Estates, for the purposes of simplicity we would propose that we make the same proportionate contribution i.e. **£405**.

Summary

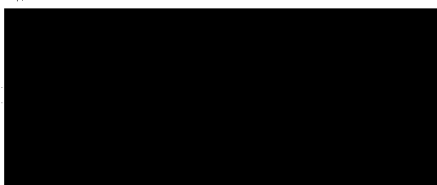
In the light of the above, and utilising the format of the table included in your representation to Arun District Council, GSL's position is set out below:

Area	Infrastructure Requirement	Cost per Item	Quantity	Total Cost GSL POSITION	SPCC Request
Yapton NPT	Officer start up equipment cost	£4,307.33	0.6	£2,584.39	£2,670.54
Yapton NPT	Officer start up recruitment and training	£5,460	0.6	£3,276	£3,385.20
Bognor Regis	Staff start up equipment cost	£2,086	0.31	£646.66	£834.40
Bognor Regis	Staff start up recruitment and training	£1,060	0.31	£328.60	£424
Bognor Regis	Premises	£12,685.15		£12,685.15	£19,700.28
Yapton NPT	Fleet	£5,462	0.6	£3,277.20	£8,575
ANPR	B2233 Barnham Road	£9,000		£405	£9,000
Total				£23,203	£44,589.42

Consistent with the case advanced by Jackson Planning for Landlink Estates, and some of the issues you have already agreed in principle with them, the above reflects a fair, reasonable and CIL compliant contribution having regard to the specifics of this site / proposals, and the specific available evidence available in this instance.

I hope that you agree but if you have any questions, please do not hesitate to get in touch.

Yours sincerely



Adam Ross

Executive Director

cc D Easton – Arun District Council