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Our Ref SP/WBC/CIL.002

2nd April 2014

Planning Department
Worthing Borough Council
Worthing Town Hall,
Chapel Road,
Worthing,
West Sussex,
BN11 1HA

Dear Sirs,

**Re: Sussex Police representation
Worthing Borough Council
Community Infrastructure Levy: Draft Charging Schedule**

I write on behalf of Sussex Police, in connection with the Community Infrastructure Levy Draft Charging Schedule, currently being consulted on by Worthing Borough Council.

I note that the purpose of the Public Examination of the Draft Charging Schedule includes consideration of whether Worthing Borough Council has used appropriate available evidence to inform the Draft Charging Schedule, and whether the Council has had regard to the guidance contained within the 'Charge Setting and Charging Schedule Procedure Guidance' March 2010.

It is the opinion of Sussex Police that Worthing Borough Council, as Charging Authority, have had full regard to the appropriate available evidence, including the infrastructure requirements of Sussex Police as outlined in our representation of December 2012. Sussex Police are also pleased to note that the policing infrastructure requirements across the Borough have been considered and that the '*Staff & facilities to enable effective policing of future community*' have been included on the Draft Infrastructure List. This list underpins the First Draft regulation 123 List and enables police infrastructure to be considered as a Community Facility which may be funded in part or full by the levy. Sussex Police therefore support the charging of the levy and the First Draft Regulation 123 List.

Due to the above, Sussex Police also consider that Worthing Borough Council have complied with the guidance within the 'Charge Setting and Charging Schedule Procedure Guidance.'

Sussex Police note other proposals within the Draft Charging Schedule, including the levy rates proposed, on which types of development, and the extent of the charging area. These proposals are noted and the proposed CIL rates appear to be at the recommended rate to strike an appropriate balance between the desirability of funding necessary infrastructure and the potential effect on economic viability if doing so.

Sussex Police also note the proposed exemptions from CIL as detailed within the Draft Charging Schedule. Whilst some of the exemptions identified will increase demand on policing infrastructure, it is noted that these exemptions allow a realistic approach to the application of CIL, as advised in guidance. These proposals are therefore accepted.

The Draft Instalment Policy (Appendix 2) is also noted and is again accepted as a realistic approach to the application of CIL. However, the provision of policing infrastructure is critical to the delivery of safe sustainable communities and this policing infrastructure will need to be provided at early stages of the development process. This is evidenced by the increased crime rates Sussex Police have noted in connection with theft from construction sites. This is raised for information only and to identify policing infrastructure as a critical infrastructure type, which may be considered in drafting of the Worthing Borough Council CIL Process Guide in due course.

Overall, Sussex Police note the charging of the levy within the Worthing Borough Council area, set at a rate based on the viability evidence and used to part fund the infrastructure needed to support future development in the area. The inclusion of Sussex Police infrastructure as part of the community facilities identified on the Draft Regulation 123 List is welcomed.

Please notify Sussex Police of the submission of the Draft Charging Schedule for Examination; publication of the recommendations of the examiner and the reason behind those recommendations; and approval of the Charging Schedule by the Charging Authority (Worthing Borough Council).

Should you require any clarification in respect of this representation, or wish to discuss any details further, please do not hesitate to contact me. We look forward to working with Worthing Borough Council on the CIL, and other planning policy matters, in the future.

Yours sincerely

Samantha Prior
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cc Chief Inspector Jo Banks, District Commander - Adur & Worthing