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Preliminary Draft Charging Schedule consultation  
Planning Policy  
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17th September 2012

Dear Sirs

**REPRESENTATIONS ON BEHALF OF THE MAYOR'S OFFICE FOR  
POLICING AND CRIME/METROPOLITAN POLICE SERVICE**

**LONDON BOROUGH OF HARINGEY COMMUNITY INFRASTRUCTURE  
LEVY PRELIMINARY DRAFT CHARGING SCHEDULE AND UPDATED  
DRAFT COMMUNITY INFRASTRUCTURE PLAN**

I write on behalf of our client, the Mayor's Office for Policing and Crime/Metropolitan Police Service (MOPAC/MPS), with regard to the Council's consultation on the Community Infrastructure Levy Preliminary Draft Charging Schedule and updated Draft Community Infrastructure Plan (CIP). The MOPAC/MPS provide a vital community service to Haringey and it is essential that the required community infrastructure, such as policing, comes forward in line with development in order to maintain safety and security in the Borough.

**Policy context to representations**

The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community, consistent with planning policy at all levels. The current planning policy framework that supports policing can be summarised as follows:

*National Guidance*

- National Planning Policy Framework (March 2012) – one of the objectives of the NPPF is to deliver the right community facilities to meet local needs (Para 70).

*London Plan*

- Policy 3.16 requires development proposals to support the provision of social infrastructure and resist the net loss of social facilities. Policing is included within the definition of social infrastructure.
- Paragraph 3.86 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes.



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- Policy 7.13 states that Boroughs should work with stakeholders to ensure London remains resilient to emergency and the subtext states the Metropolitan Police should be consulted as part of major development proposals.
- Policy 8.2 requires development proposals to address strategic as well as local priorities in planning obligations. Boroughs should set out a clear framework for negotiations on planning obligations in their LDF to ensure that *'it will be a material consideration whether a development makes an appropriate contribution or other provision (or some combination thereof) towards meeting the requirements made necessary by, and relating to, the proposed development'*.

In light of the overarching policy basis we wish to make the following comments in relation to the Preliminary Draft Charging Schedule and updated Draft Community Infrastructure Plan.

### **CIL Preliminary Draft Charging Schedule**

#### ***Exemptions***

Section 4 states that CIL payments will be required from residential and retail development only. All other development would not have to pay and the MOPAC/MPS supports this approach.

Paragraph 4.4 does state that depending on the state of the market, this position may change between the preliminary schedule and the draft schedule. If this were to occur the MOPAC/MPS consider it essential that CIL is not payable for new policing floorspace in the borough. By being subject to a CIL payment, community uses including policing would be prejudiced in being able to provide essential policing facilities contrary to the aims of the NPPF and London Plan.

It should be further noted that, in providing community infrastructure (i.e. new policing facilities) which would attract a CIL liability, the MPS contribution to community infrastructure would effectively be double counted.

#### ***Beneficiaries***

In addition to the above it is recommend that, when formulated, the list of beneficiaries of CIL (Regulation 123) includes policing facilities and that this includes a contribution towards policing where development would have a material impact upon policing provision in the Borough. This is consistent with the DCLG guidance - Community Infrastructure Levy: An Overview published in May 2011 which states that the levy can *'be used to fund a very broad range of facilities such as [inter alia] police stations and other community safety facilities'* (para 12).

### **Updated Draft Community Infrastructure Plan**

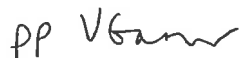
The Council have prepared an update to the previous plan published in March 2010. To inform this CgMs on behalf of the MOPAC/MPS provided information on police infrastructure requirements in the borough to the Council in November 2009.

Attached to this letter is an updated and expanded table which we hope to be able to provide more detail on in due course and may be subject to amendments once the evolving MOPAC Local Policing Model is finalised. The MOPAC/MPS request that

the table attached, or any subsequent amendments to this, are incorporated in the next version of the CIP.

I trust that this is acceptable and the objectives of the MOPAC/MPS will be reflected in the forthcoming documents. Please do not hesitate to contact Vanessa Garner or myself at this office should you have any queries or require any further information.

Yours faithfully



**John N. Smith**  
**Senior Associate Director**

c.c. Metropolitan Police