



Date 12th June 2013

Your Reference

Our Reference MBK/AO/30318

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**By Email (ldf@haringey.gov.uk) And By Post**

G Ball Esq  
Planning Policy Officer  
London Borough of Haringey  
6th Floor, River Park House  
225 High Road  
Wood Green  
London N22 8HQ

Dear Mr Ball

**LB Haringey - CIL - Consultation On Draft Charging Schedule**

We write in order to make comment on the above named document. Please note that we act on behalf of the London Fire & Emergency Planning Authority (LFEPA) and that this representation is made on their behalf. For your information the following LFEPA sites are within the borough:-

- Hornsey Fire Station – 108 Park Avenue South, N8 8LS.
- Tottenham Fire Station – 49 St Loys Road, N17 6UE.

We note that there has been a change made to the charging schedule, following the initial consultation relating to the preliminary schedule, in September/October 2012. 'All other uses', under which category a new fire station and fire station facilities will fall, is now to carry a charge across the three charging zones (West, Central, and East), of £50 per square metre.

As fire stations are a vital community safety facility, we believe that they should be excluded from payment of this levy as this ultimately results in a charging of the levy on one of the very uses that CIL is designed to fund. Payment of such a levy would also render new fire station development unviable. We therefore request that particular reference to this use be included within the schedule, with a nil levy set against it.

Fire stations are community safety facilities, which are included within the wider definition of 'infrastructure' under the Planning Act 2008. Therefore any new development including the provision of a new fire station, will already be making a substantial contribution to the infrastructure which CIL is designed to fund. Furthermore, CIL payments will effectively result in double counting, impacting on the viability of a scheme which involves a new fire station within a development. It is also worthy of note that other London boroughs have excluded fire station and associated uses from payment of a CIL levy, most notably Barnet, Brent, Richmond

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Upon Thames and Sutton. A number of others have also excluded payment of a CIL levy for fire stations, as they fall under 'All Other Uses'.

We trust that the reasons set out above are sufficient for the Council to reconsider that a fire station does fit within the definition of community infrastructure and hence should not have a CIL levy payable. We look forward to receiving future correspondence from you relating to the matter. In the meantime, please do not hesitate to contact me, should you require any further information, or further clarification of the points raised above.

Yours sincerely

**Melanie Barlow-Graham**  
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