



Executive
16 November 2009

**Report from the Director of
Environment and Culture**

Wards Affected:
All

LDF - progress and proposed changes for examination

Forward Plan Ref. E&C- 09/10-19

1.0 Summary

- 1.1 Progress with the Council's Local Development Framework (LDF), particularly the Core Strategy and Site Specific Allocations documents which will form the new development plan, is explained and Executive is asked to agree minor changes to the Core Strategy for consultation in advance of Examination by a Planning Inspector early in 2010.

2.0 Recommendations

- 2.1 That Executive agrees the proposed changes to the Core Strategy set out in Appendix 1, for public consultation.

3.0 Detail

Introduction

- 3.1 The proposed submission versions of both the Core Strategy and the Site Specific Allocations DPDs were published for public consultation in June 2009. There were 400 representations made by 46 respondents. Of these representations, 166 were that the document is sound whereas 234 considered it to be unsound. On September 30th 2009 the council submitted the Core Strategy, and all the representations made, as well as a schedule of non-material changes, to the Secretary of State for examination by a planning inspector. A summary of the key issues arising from the representations is attached as Appendix 2.
- 3.2 It is intended that the Site Specific Allocations DPD will be submitted either by the end of the year or early in 2010. The reason the Site Specific Allocations DPD was not submitted at the same time as the Core Strategy is

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that Planning Inspectorate guidelines indicate that they would not hold an examination into site allocations until after the report on the Core Strategy examination has been published. This will not be before spring 2010. In addition some further proposals for Site Allocations are being considered and may be brought forward as new site allocations at a future Executive.

Proposed Changes

- 3.3 Since the consultation period ended, discussions with potential objectors and stakeholders have resulted in proposals to make a few minor changes to policy in the Core Strategy. Members are asked to agree, for public consultation, these proposed changes which are set out in full in Appendix 1. This consultation will take place whilst the arrangements are made for the Examination and will not, therefore, delay the process.
- 3.4 The first change is very minor and is proposed, in part, in response to a recommendation from the Government Office for London. This is basically to encapsulate the objective of achieving the London Plan target for affordable housing (70% social housing and 30% intermediate) in policy rather than merely in supporting text. It is a requirement of Government planning policy as set out in PPS3 that Local Development Frameworks include such a policy. This does not alter any of the objectives of the strategy.
- 3.5 The remaining two changes concern policy on climate mitigation and, in particular, how this relates to Wembley (policies CP19 and CP7). A number of objections were received to policy CP19 (shown at Appendix3), particularly to the expectation in the policy that development would have to connect to decentralised energy networks. Concerns were expressed, including by the GLA, that proposals for such networks were not sufficiently advanced and that there was a need to set out the Council's plans for delivering sustainable energy infrastructure. Officers recognise that further development work would be needed before developers could be asked to connect to such networks and, in particular, some assessment of the viability / feasibility. In these circumstances officers recommend that the wording of policy CP19 be changed to allow developers the opportunity to demonstrate that connecting to decentralised networks is not feasible. At the same time the infrastructure sought for Wembley will include District-wide Combined Cooling Heat and Power "if feasible". These relatively minor changes are likely to overcome some of the objections relating to the soundness of the Core Strategy.
- 3.6 Since the consultation on the submission version of the Core Strategy in June, the GLA and London Councils have committed to providing support to the Council, under the Decentralised Energy Masterplanning Support Package, to bring forward decentralised energy projects and to help define what is technically feasible. They will also assist the Council in looking at the issue of economic viability, and the GLA will look into providing some general guidance or definition on the terms "feasible" and "viable". It is proposed that a further sentence be added to the Core Strategy referring to this support.
- 3.7 In addition to the proposed changes outlined above, 3 additional background documents have been made available. These provide further support to policies within the Core Strategy and can be found on the website at the following link:

They are:

Affordable Housing Viability Study, BNP Paribas Real Estate, Sept. 2009;
Core Strategy: Tall Buildings, LB Brent, Sept. 2009;
Scenario and Sensitivity Testing Paper on Retail Matters, Roger Tym & Partners, Sept. 2009.

4.0 Financial Implications

4.1 There are no financial implications arising directly from this report. However, pursuit of a district-wide CCHP system, as indicated in policy CP7, may have some implications for Council expenditure in the future, depending upon how any scheme is implemented.

5.0 Legal Implications

5.1 The preparation of the LDF, including the Core Strategy, is governed by a statutory process set out in Government planning guidance and regulations. The regulations allow for changes to be proposed to the draft Plan after publication. The changes proposed will be put to the Inspector for consideration along with any representations that may be made upon them.

6.0 Diversity Implications

6.1 Full statutory public consultation has been carried out in preparing the Core Strategy and an Impact Needs / Requirement Assessment (INRA), which assessed the process of preparing the Core Strategy, was prepared and made available in November 2008.

Background Papers

Core Strategy, Proposed Submission, June 2009
Site Specific Allocation Proposed Submission DPD, June 2009

Contact Officers

Any person wishing to inspect the above papers should contact Ken Hullock, Planning Service, X5309, ken.hullock@brent.gov.uk

Richard Saunders
Director of Environment & Culture

Proposed Changes to the Core Strategy: Submission Version

Introduction

The Council submitted its Core Strategy to the Secretary of State on 30th September 2009. Since then, discussions with potential objectors and stakeholders have led to the Council proposing a few minor changes to policy which will be considered by the Inspector appointed to examine the Strategy. These changes are set out below.

Since consultation on the proposed submission version of the Core Strategy ended on July 13th, further supporting documents have been made available. Representations relating to the soundness of these proposed changes to the Core Strategy Submission Version and associated documents can be made by 8th January 2010.

on-line at www.brent.gov.uk/ldf,

by e-mail to ldf@brent.gov.uk,

or in writing, using the response form provided, to:

LDF Team

Planning Service

LB Brent

Brent House

349 High Road

Wembley

Middlesex HA9 6BZ

Proposed Changes

Additions to policies are shown in *italics*

Deletions to policies are ~~struck through~~

Paragraph 4.8

The direction for the future change and regeneration of the borough also needs to accommodate population and housing growth. The issue is how much growth is appropriate and how, where and when it can be provided. The council accepts that at least 10,146 new homes (including 1,000 non self-contained homes) can be accommodated in Brent up until 2016/2017, and will aim for a target of 50% affordable in accordance with the London Plan. *Within that, the Council will also aim to achieve the objective of 70% social housing and 30% intermediate provision. The position will be reviewed should the proposed revisions in the draft London Plan be adopted (see also paragraphs 5.91 and 5.92).*

Paragraph 5.33

The London Plan requires each council in London to designate a site for a ZED and the Mayor of London has included a number of policies (4A.1 - 4A.11) that address climate change and related sustainability issues in developments. In addition, the Mayor's recent 'Climate Change Action Plan' sets out further initiatives for London to

meet its targets. *The feasibility of decentralised energy in Wembley has been examined for the council by Arup in the 'Brent Sustainable Energy Infrastructure Wembley Feasibility Study'. In addition, the GLA and the LDA are to support the council, under the Decentralised Energy Masterplanning Support Package, to bring forward decentralised energy projects.* In order to kick-start 'Low-Carbon' & 'Zero-Emissions Developments' (or ZEDs) in Brent, the following 2 sites have been designated within the Site Specific Allocations DPD. The council considers that specific site characteristics make these suitable for low/zero carbon development:

CP 2

Population and Housing Growth

The borough will plan for sustainable population growth of 28,000 people by 2017. The provision of at least 22,000 additional homes (including 1,030 re-occupied vacant homes) will be delivered between 2007 and 2026 (including over 11,200 homes from 2007/08 to 2016/17). The borough will aim to achieve the London Plan target that 50% of new homes should be affordable *and, within that, the objective of 70% social housing and 30% intermediate provision.* Over 85% of the new homes will be delivered in the growth areas with the following minimum targets:

	2007-2016	2017-2026
Wembley	5000	6500
Alperton	1500	100
Burnt Oak / Colindale	1400	1100
Church End	700	100
South Kilburn	1400	1000
Rest of the Borough	2050	360

The council will also promote additional housing as part of mixed use development in town centres where public transport access is good.

Policy CP 7

Wembley Growth Area

Wembley will drive the economic regeneration of Brent. It will become a high quality, urban, connected and sustainable city quarter generating 10,000 new jobs across a range of sectors including retail, offices, conference facilities, hotels, sports, leisure, tourism and visitor attractors, creative and cultural industries and education facilities reflecting its designation as a Strategic Cultural Area for London. Around 70 hectares of land around the Wembley National Stadium and Wembley town centre will be redeveloped for at least 11,500 new homes to 2026, supported by infrastructure identified within the Infrastructure and Investment Framework. This will include:

- New road connections
- Junction improvements
- 2 new 2 form of entry primary schools
- A new combined primary (2 form of entry) and secondary school (6 form of entry) on the Wembley Park site
- Extensions to existing local schools
- Nursery places
- At least 2.4 hectares of new public open space comprising of a new park (1.2ha min) and 3 pocket parks/squares (0.4ha each)
- Improvements to the quality and accessibility of existing open spaces
- A new community swimming pool
- A new civic centre
- Indoor and outdoor sports facilities
- Play areas
- A minimum of 1,000 trees
- New health facilities with space for 17 GPs and 13 new dentists
- *If feasible*, District-wide Combined Cooling, Heat and Power as set out in Policy CP17
- New multi use community facilities

As identified in Map E.1 'Wembley Growth Area, Energy Action Plan Area and Town Centre Boundary', Wembley town centre will be extended eastwards to facilitate a further 30,000sqm net of new retail floorspace in addition to that already granted planning consent.

CP 19

Brent Strategic Climate Mitigation and Adaptation Measures

All development should contribute towards achieving sustainable development, including climate change mitigation and adaptation.

Major proposals (10 or more dwellings and 1,000m² or more floorspace) and proposals for sensitive uses (education, health and housing) in Air Quality Management Areas, should submit a Sustainability Statement demonstrating, at the design stage, how sustainable design and construction measures are used to mitigate and adapt to climate change over the intended lifetime of a development. This includes the application of the London Plan energy hierarchy and meeting or exceeding the London Plan targets. In all areas a minimum rating of Code Level 3 should be achieved. For non-residential, a rating of BREEAM 'Excellent' is expected, or the equivalent on any 'Code for Sustainable Commercial Schemes' (when forthcoming).

Within the Wembley Energy Action Area (EAA) and in the Housing Growth Areas, major proposals are currently required to achieve a minimum Level 4 rating (in relation to the Code for Sustainable Homes). In particular, proposals will be expected (relative to their scale) to connect to, provide or contribute towards decentralised energy networks (heating and cooling) and renewables infrastructure in key Growth Areas of the Borough, notably Wembley, *unless it can be demonstrated that such provision is not feasible*.

Additional Supporting Documents

Affordable Housing Viability Study, BNP Paribas Real Estate, Sept. 2009

Core Strategy: Tall Buildings, LB Brent, Sept. 2009

Scenario and Sensitivity Testing Paper on Retail Matters, Roger Tym & Partners, Sept. 2009.

Appendix 2

Core Strategy Proposed Submission DPD Consultation Responses

Number of Representations

Number of respondents: 46
 Total no of representations: 400

There were only 5 individuals who made representations (including 4 councillors), the remainder being businesses or organisations. Two residents associations responded.

Representations that CS is sound 166
 Representations that CS is unsound 234

(NB Respondents were asked to indicate whether they considered that the part of the strategy they referred to was considered to be sound or unsound. The Inspector is required to determine whether the Core Strategy is a “sound” document, i.e. justified, effective and consistent with national policy.)

Representations by policy referred to

Policy	Title	Total Reps	Sound	Unsound
CP1	Spatial Development Strategy	11	6	5
CP2	Population and Housing Growth	14	8	6
CP3	Commercial Regeneration	5	3	2
CP4	North-West London Co-ordination Corridor	2	2	0
CP5	Placemaking	8	4	4
CP6	Design & Density in Place Shaping	10	6	4
CP7	Wembley Growth Area	6	3	3
CP8	Alperton Growth Area	5	5	0
CP9	South Kilburn Growth Area	2	2	0
CP10	Church End Growth Area	2	1	1
CP11	Burnt Oak/Colindale Growth Area	4	1	3
CP12	Park Royal	6	4	2
CP13	North Circular Road Regeneration Area	2	1	1
CP14	Public Transport Improvements	3	1	2
CP15	Infrastructure to Support Development	11	6	5
CP16	Town Centres and the Sequential Approach to Development	8	2	6
CP17	Protecting and Enhancing the Suburban Character of Brent	5	1	4
CP18	Protection and Enhancement of Open Space, Sports and Biodiversity	5	4	1
CP19	Brent Strategic Climate Mitigation and Adaptation Measures	11	5	6
CP20	Strategic and Borough Employment Areas	4	1	3
CP21	A Balanced Housing Stock	6	4	2
CP22	Sites For Nomadic Peoples	1	1	0
CP23	Protection of existing and provision of new Community and	4	3	1

(NB This table does not include all objections as a number were general or concerned with other parts of the Strategy)

Key Issues

General

Concern expressed that policy should protect existing uses that contribute to the local economy and development should take account of existing site characteristics.

Suggested that the Core Strategy is unsound because of insufficient evidence.

Issues about the appropriate locations for tall buildings and evidence to support policy.

Housing

Issues relate to:

- whether policy should reflect the emerging London Plan, which suggests that more flexible requirements will be introduced for affordable housing, and whether the target of 50% should apply.
- whether the need for viability to be taken account of in determining appropriate levels of affordable housing should be explicitly set out in policy.

Concerns about whether the stated capacity is deliverable and that there no are mechanisms for delivering the level of family housing sought. Delivery of housing targets not based on a SHLAA.

GOL consider that reference to the 70:30 social rental and intermediate housing provision should be in policy.

Town Centres and Retail

Sequential preference for town centres - in particular whether Wembley should be promoted as sequentially preferable.

Whether retail development should be contingent upon creating a continuous retail link from the High Road.

Assessment of retail floorspace need is based upon a flawed retail need and capacity study.

Concern about the appropriate categorisation of town centres in the hierarchy.

Infrastructure

Infrastructure requirements - including:

- whether the evidence base is adequate; and
- whether the requirements are based on need arising from new development or making up existing deficiencies.

Climate Change Mitigation and Adaptation

There is insufficient evidence to support and justify the Code for Sustainable Homes /BREEAM requirement in growth areas and Wembley Energy Action Area and also a lack of evidence to demonstrate deliverability of proposed decentralised energy networks.

Employment Land

There are issues relating to the protection of employment land. The GLA are concerned about policy insufficiently protecting a particular Strategic Employment Location (Northfields) whilst other objectors would wish to see greater flexibility and exceptions to policy allowed.

Community and Cultural Facilities

The development of co-located multi-purpose facilities discriminates against a wide range of community groups, particularly faith groups which require dedicated community activity use. New community uses could in principle use industrial / commercial sites

Appendix 3 - Comments Received on Policy CP 19 Brent Strategic Climate Mitigation and Adaptation Measures

CY/ NO.	CONSULTEE	REASONS FOR SOUND / UNSOUND	CHANGES CONSIDERED NECESSARY
Paragraph 2	Quintain Estate and Development Plc	<p>fails all 3 tests</p> <p>QED object to the extension of the Energy Action Area boundary as proposed in Paragraph 5.32 and on Map E1. There is little specific planning guidance or sound planning evidence on this designation and the impact upon the future viability of development within the Growth Area and Masterplan Area as a result of this designation is of concern. It is requested, therefore, that this designation be removed back to the original boundary around the Stage One lands.</p> <p>Obligations pursuant to the Energy Action Area designations could completely impede the delivery of the other benefits of regeneration envisaged by LBB, including housing growth, economic regeneration, the delivery of large leisure attractors, the provision of housing across all tenures and other S106 contributions. It is proposed that such a designation is reviewed collectively between LBB, QED and the other landowners in the area when categorical guidance is available from the GLA so that compliance can be properly quantified and viability fully understood. This is consistent with paragraph 4.28 of PPS12.</p>	
Paragraph 4	Quintain Estate and Development Plc	<p>fails all 3 tests</p> <p>The categoric requirement to deliver SUDS solutions (para 5.34) is not right as the various techniques may not be appropriate. The reference should be adjusted to facilitate appropriate flexibility including other methods.</p> <p>Later in the Core Strategy document there is reference to the intention that that LBB will not approve applications where the Environment Agency has objections. This could place the Environment Agency into the role of the decision maker on significant regeneration schemes.</p>	

		<p>Elements of the Wembley Growth Area are affected by Flood Risk Zones and it is appropriate that these risks should be satisfactorily mitigated. However, satisfactory mitigation is often the subject of negotiation with the EA who, from experience, seek to achieve Greenfield Run-Off Rates even on Brownfield Land. If LBB is to achieve the levels of housing and economic growth envisaged by the Core Strategy, and to facilitate the delivery of the envisaged regeneration in their own policy documents, it must retain its ability to consider the contentions of all stakeholders and find a balanced solution.</p>	
19	AWDL	<p>The proposed requirement for all homes in growth areas to achieve Code for Sustainable Homes Level 4 and for non residential floorspace to achieve BREEAM 'Excellent' needs to recognise that the achievement of these standards has a cost implication and this may well prevent the delivery of other planning benefits.</p> <p>Paragraph 5.33 forms part of the justification to this policy and states that the specific site characteristics of two sites in the Borough makes them suitable for low/zero carbon development. One of these sites is Abbey Estate, Alperton.</p> <p>We do not believe that this policy appropriately justifies why these two particular sites are more suitable than all others in the Borough for low/zero carbon development and the practicalities, constraints and deliverability of this designation do not appear to have been given due weight. Whilst we are supportive of the delivery of energy efficient developments the designation appears to be arbitrary and the lack of a justification for this designation means that we object. In the absence of detailed justification we do not consider that this designation meets the Government's tests of soundness for development plans.</p>	Site should not be allocated for zero carbon development.
19	Greater London Authority	<p>Support with change</p> <p>Paragraph 4.100 refers to the 'Brent Sustainable Energy Infrastructure - Wembley Feasibility Study', 2008, which proposes the use of strategic energy infrastructure including decentralised heat and cooling networks. However, insufficient guidance in relation to the</p>	Policy CP19 to set a higher Code for Sustainable Homes level in the Wembley Energy Action Area (EM) and the Housing Growth Area is supported. However Code Level 4 will

		<p>study's conclusions and proposals for the use of decentralised energy is provided in the core strategy. For example the study identifies that Brent Council needs to play a pivotal role in the delivery of sustainable energy infrastructure and to lead by example with their own development portfolio.</p>	<p>come into mandatory operation through building regulations as of 2013 and the Council should consider the treatment targets in these areas post 2013. Also, it is unclear whether non-residential developments in the Energy Action Area will also be set higher targets.</p> <p>The Core Strategy should set out the Council's plans for delivering the sustainable energy infrastructure as well as requirements for developers to be designed to connect to the planned network and prioritise connection once this is built.</p>
19	KH Wembley Trust No.2	<p>Policy CP 19 states that within the Wembley Energy Action Area (EAA), major proposals are currently expected to provide a minimum Level 4 rating in relation to Code for Sustainable Homes and a rating of BREEAM 'Excellent' .</p> <p>This is too restrictive, especially considering that the CfSH is currently under review.</p> <p>The policy also states that within the key Growth Areas, notably Wembley, proposals will be expected to connect to or contribute towards decentralised energy networks (heating and cooling) and renewables infrastructure. However, there are no details provided about such schemes and no strategy put forward for their management and provision.</p>	<p>The policy should be re-worded to be more flexible and say that instead of expecting a BREEAM 'Excellent' and Level 4 rating, that these should be targets.</p> <p>In relation to the decentralised energy networks, details need to be provided on how these will be delivered and how they will be managed. The policy is too vague in this sense.</p>

19	Peaceridge	<p>CP19 / Strat Ob 10</p> <p>Peaceridge Limited is committed to sustainable development. However, Policy CP19 and the supporting text state within the Wembley Energy Action Area (EAA) major proposals are required to achieve a minimum level 4 Code of Sustainable Home (CSH) rating. Peaceridge Ltd contend that:</p> <ul style="list-style-type: none"> • More details are required on the Wembley EAA, its scope and justification; • CSH level 4 should be a target and that Policy CP 19 is amended to reflect the scheme specific nature of proposals which may, for legitimate reasons, constrain the ability to attain a level 4 rating. This amendment is in accordance with strategic planning guidance contained within the London Plan; and • That BREEAM 'Excellent' should be a flexible target which reflects the scheme specific nature of proposal which may for legitimate reasons constrain the ability of to attain the target level. <p>Moreover, CP19 requires proposals to connect to, provide or contribute towards decentralised energy networks - notably Wembley. Peaceridge Ltd contends that this element of the policy should be applied flexibly, recognising that such networks may not currently exist.</p>	see above
19	Dhamecha Group	<p>We consider that new development proposals should incorporate measures, as far as possible, to mitigate climate change. We do not support the application of a target to securing sustainable developments but rather each scheme should be assessed on its merits with regard to site specific circumstances and viability. The policy should recognise, in line with the Mayor of London's Energy Strategy, that the expense of retrofitting an existing building can make such an operation impractical and it is more practical to deliver energy savings</p>	<p>Amend the policy to state that each development proposal will be assessed on its merits with regard to site specific circumstances and viability.</p> <p>Climate change adaptation measures</p>

		through new build rather than retrofitting.	are required in new developments rather than the retrofitting of existing buildings.
19	Solum Regeneration	In our view, CP19 of the Core Strategy relating to the requirement for a minimum Level 4 rating (Code for Sustainable Homes) in the Housing Growth Areas is unsound because it is unjustified as there is no supporting robust and credible evidence base. In our view, there should not be a disparity between areas in delivering sustainable new homes.	To make CP19 sound the evidence behind requirement for Code for Sustainable Homes Level 4 in the Housing Growth Areas should be published so that key stakeholders have the opportunity to comment on it. Alternatively, all new housing development in Brent should be subject to the same requirements and we suggest that new homes should be expected to meet, and wherever possible encouraged to exceed, national standards of construction.
19	Quintain Estate and Development Plc	<p>fails all 3 tests</p> <p>We recognise the importance of submitting a Sustainability Statement, however we believe that Policy CP19 is too specific and not sound on the basis of evidence. Also, an element of flexibility should be introduced and the policy application should be tested against viability and other planning obligations and requirements to ensure it is feasible and realistically deliverable.</p> <p>QED is firstly concerned about the extension of the Energy Action Area boundary as proposed in Paragraph 5,32 and on Map E1. There is little specific planning guidance or sound planning evidence on this designation and the impact upon the future viability of</p>	

development within the Growth Area and Masterplan Area as a result of this designation is of concern. It is requested, therefore, that this deSignation be removed back to the original boundary around the Stage One lands. Obligations pursuant to the Energy Action Area deSignations could completely impede the delivery of the other benefits of regeneration envisaged by LBB, including housing growth, economic regeneration, the delivery of large leisure attractors, the provision of housing across all tenures and other S106 contributions, It is proposed that such a designation is reviewed collectively between LBB, QED and the other landowners in the area when categorical guidance is available from the GLA so that compliance can be properly quantified and viability fully understood, This is consistent with paragraph 4,28 of PPS12.

Policy CP19 states that in the Wembley Energy Action Area (EM), and in the Housing Growth Areas, major proposals are required to achieve a minimum Level 4 rating in relation to Code for Sustainable Homes, and that proposals will be expected, relative to their scale, to connect to, provide or contribute towards decentralised energy networks and renewables infrastructure in key growth areas of the Borough, notably Wembley. Our comments above in relation to Policy CP7 (copy attached) in relation to the need to consider viability and feasibility are highly relevant and it is important that the last paragraph of Policy CP19 incorporates such wording.

It is currently understood that the purpose of the Wembley Energy Action Area is to demonstrate replicable models for raising carbon performance through viable market mechanisms, Therefore there should be no prescriptive code Level 4 required for the Wembley EM.

It is suggested that LBB seek CCHP, subject to viability tests, since the deliverability of a district wide system must be questioned, It is noted that the Policy requires proposals to connect to, provide or contribute towards decentralised energy networks, We would draw your attention to the London First report 'Cutting the Capital's Carbon Footprint - Delivering

Decentralised Energy', October 2008 (Appendix 4), This brought together experts in different disciplines to find the best way of achieving the target of decentralising a quarter of London's energy by 2025; to reduce the carbon impact and improve efficiency of energy supply.

It assessed the scale of the challenge, identified the barriers and suggested how they could be overcome. The report involved engagement with the Capital's and country's leading experts in the public and private sectors, with support from over 90 organisations, We would commend this report to the borough, and suggest that it should take account of its principal conclusions in the search for feasible and realistic solutions to decentralised energy.

The requirement for district wide CCHP is not consistent with Policy 4A.6 of The London Plan (Consolidated in 2008). This policy emphasises the importance of considering CCHP/CHP on a 'site-wide basis' that connects different uses and/or groups of buildings. However, the viability and technical feasibility of this is recognised as a significant point of consideration. The requirement for a 'district wide' CCHP system is different from a 'site-wide' system and there should be significant consideration of viability and feasibility. It is important that this is recognised in Policy CP7 and Policy CP19.

Similarly, the target of 20% on site renewables is set by the GLA on a viability basis. The same qualifying criteria should be set by LBB.

Also, as referred to previously, we consider that the soundness of the evidence base for the sustainability and energy requirements for Wembley in the Core Strategy (Le. the Arup Wembley Feasibility Study of 2008), is of concern. In undertaking the study, Arup have discussed with QED neither its work on CCHP nor the feasibility and viability of the measures recommended. Arup's recommendations are not sound. Furthermore, there is no real deliverability plan to the measures Arup recommends, which appear to be aspirational

and idealistic.

The categoric requirement to deliver SUDS solutions (para 5.34) is not right as the various techniques may not be appropriate. The reference should be adjusted to facilitate appropriate flexibility including other methods.

Later in the Core Strategy document there is reference to the intention that that LBB will not approve applications where the Environment Agency has objections. This could place the Environment Agency into the role of the decision maker on significant regeneration schemes.

Elements of the Wembley Growth Area are affected by Flood Risk Zones and it is appropriate that these risks should be satisfactorily mitigated. However, satisfactory mitigation is often the subject of negotiation with the EA who, from experience, seek to achieve Greenfield Run-Off Rates even on Brownfield Land. If LBB is to achieve the levels of housing and economic growth envisaged by the Core Strategy, and to facilitate the delivery of the envisaged regeneration in their own policy documents, it must retain its ability to consider the contentions of all stakeholders and find a balanced solution.