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By email: planningstrategy@brent.gov.uk

2nd December 2019

Dear Mr Lewin

London Borough of Brent Local Plan – Regulation 19 Consultation

Thank you for the opportunity to comment on the above consultation. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.

Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG). We note and welcome a number of the changes made to the draft Plan since the previous public consultation, including a number of textual amendments to site allocations. As a result, we have only limited comments to make at this stage.

Site allocation BCSA1: We would reiterate our previous comments over the potential for development on this site having adverse impacts on the adjacent Barn Hill conservation area. While the conservation area is identified in the *Planning Considerations* section of the allocation, it is not referred to or reflected in the *Design Principles* section, although we note that potential effects on the Grade II listed former Brent Town Hall are specifically referenced. We continue to consider that this approach could lead to proposals coming forward that would create harm to the setting of the conservation area and on its heritage significance. We note that there appears to have been no analysis of the effects of such development on the conservation area, and would encourage the Borough Council to



address this by including further text in the Design Principles section to ensure adequate consideration of any potential impacts. We would also commend relevant Historic England guidance on this issue, which can be found here:

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

Policy BH4 Small Sites: We would point out that policy H2 in the draft new London Plan has been amended as a result of various discussions. These amendments have resolved any concerns Historic England had with the previous text. It would be helpful to clarify and confirm that the draft Brent Plan commitment to policy H2 of the London Plan is the amended version.

Paragraph 6.5.18 and the statement: *“Its archaeological discoveries are scarce; sites have been built over and there are limited places where archaeologists could investigate.”* This statement significantly downplays the archaeological potential without proper assessment, and whilst we acknowledge that development across the borough will have had some impact, there are substantial areas where past development has been limited, meaning that there is still a potential for previously undiscovered archaeological remains. We would recommend removing this part of the paragraph.

Paragraph 6.5.26 – We recommend the following amendment to this paragraph: *“Where development is proposed for a site which includes or has the potential to include heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation, in order to assess the archaeological significance of the site and the scale of the archaeological impact from the proposed works. Applicants should consult with Historic England’s Greater London Archaeological Advisory Service should take place in order to determine the scope of the archaeological requirements.”*

Local Plan Integrated Impact Assessment

Page 388 – Evidence gaps – 3rd bullet point needs to be changed to APA review will take place in 2020. Recommend directing to our APA webpage: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/greater-london-archaeological-priority-areas/>



Historic England

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.



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