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5<sup>th</sup> December 2019

Dear Mr Lewin

### **LB Brent Draft Local Plan – Regulation 19 consultation**

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust is the owner and navigation authority of the Grand Union Canal (Paddington Arm), and the adjacent towpath. We also own and manage the Brent Reservoir and the Brent Canal Feeder within the borough.

Our canals do, or have the potential to, provide important areas for recreation, biodiversity, sustainable active transport (with related health and air quality benefit), business, tourism, a focal point for cultural activities, and are heritage assets. Waterways can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed and a way of sustainably draining surface water away from new developments. In some cases, it is also possible to transport freight via our waterways.

You kindly sent us a draft Statement of Common Ground, which I have amended and attached for your comments. We have added an extra section on heritage, which we consider is significant, particularly with regard to the Welsh Harp.

The Trust has reviewed the Regulation 19, Proposed Submission consultation document, and we are pleased to note the changes made following our earlier comments. We have the following further comments to make:

#### 6.5 Heritage and Culture

The Trust's original comments here were: "The canals, towpaths and bridges over them, are all part of the industrial heritage of our network. Where not already formally designated local policy should recognise their heritage value through local-designation and encourage development to protect and enhance the historic character of the canals."

The Council's response was: "The canal as it passes through Brent is considered to have very little in terms of structures or positive setting of historical significance, particularly outside of what the Trust owns. As such the Council is not

currently proposing to identify any locally specific designations. It will however be willing to consider specific features suggested by the Trust. Nevertheless, these will mostly be within the gift of the Trust as their owner to conserve/enhance.”

The Trust continues to disagree that the Grand Union Canal through Brent has little in terms of historical significance. The area that the Grand Union Canal passes through developed through the industrial heritage of the area, supported by the transport provision from the canal. While none of the structures are designated heritage assets, we consider that the protection and enhancement of the canal infrastructure is important in its own right, as historic transport infrastructure. Equally, so is the protection and enhancement of the spaces around it, which impact on the setting of the historic canal.

The canal is supported by an aqueduct as it passes over the River Brent, the Twyford Aqueduct, which is currently hidden from view but deserves recognition and enhancement. That is in addition to the impressive aqueduct over the A406.

In addition, the Welsh Harp reservoir has significant heritage importance within LB Brent. As described in the Trust’s Statement of Common Ground with LB Brent, the reservoir has a fascinating history. Its construction began in 1834, followed by its enlargement in 1853, then its subsequent reduction in size in the 1930s, and the addition of five iron syphons in 1936. These changes echoed the changing fortunes of London’s commercial waterways, as well as the story of its becoming a visitor destination in the 1860s, with Welsh Harp Station being opened in 1870 to bring large crowds to the reservoir, the Old Welsh Harp Inn and its associated pleasure gardens, and alterations made to prevent flooding. The elevated location offers opportunities to present its story of strategic management of water supply via the 3¼-mile long feeder (entirely within LB of Brent) to the Grand Union Canal (Paddington Arm) and Regent’s Canal, against a backdrop of continual water shortage issues in the 19th century. The spectacular structure includes the dam and its syphons. The reservoir was also used for testing the world’s first amphibious tank at the end of the First World War, while it was also rumoured that a seaplane was stored there in order to evacuate the Prime minister, Churchill, in the event of invasion during the Second World War.

Paragraph 185 of the NPPF states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness.”

The Grand Union Canal would be able to support all of these aims more effectively if its historic significance is more appropriately recognised within the Local Plan.

Paragraph 7.1.2 of the draft new London Plan 2019 states “London’s diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas (*my edit - of which over 40 include the Trust’s inland waterways*), 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways...”.

We would welcome further discussions with LB Brent about the designation of a canal conservation area through the LB Brent area, consistent with the treatment of the canal in neighbouring boroughs – in fact, the Grand Union Canal forms part of a conservation area where it continues outside of the borough’s boundaries to both the east and the west, through LB Ealing’s Canalside Conservation Area, but is not designated within LB Brent. Formal designation would help develop and define a sense of place, and enable more robust protection for the canal’s precise alignment, the route and constant grade of the towpath, which contribute towards its character. Developments would be required to demonstrate that they respond positively to its significance.

We hope to work with you closer as you progress the new Local Plan. Should you have any further queries on these comments, please feel free to contact me.