

**Lewin, Paul**

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**From:** Jack, Isabella <Isabella.Jack@naturalengland.org.uk>  
**Sent:** 30 September 2020 09:35  
**To:** Ashton, Charlotte  
**Subject:** RE: Examination of Brent Local Plan - HRA for draft Brent Local Plan

Dear Charlotte,

Thank you for your email. After reviewing the changes, we can confirm that Natural England are still happy with the HRA and its conclusions.

Please let me know if you need any further information.

Best wishes,  
Isabella

Isabella Jack – Sustainable Development Adviser  
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**From:** Ashton, Charlotte [mailto:Charlotte.Ashton@brent.gov.uk]  
**Sent:** 29 September 2020 17:33  
**To:** Jack, Isabella <Isabella.Jack@naturalengland.org.uk>; SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>  
**Subject:** Examination of Brent Local Plan - HRA for draft Brent Local Plan  
**Importance:** High

Dear Natural England,

The draft Brent Local Plan is currently going through the examination hearing process. Natural England commented on the HRA (part of the Integrated Impact Assessment) of the draft local plan at Preferred Options stage (Regulation 18), commenting that “*Natural England agree with the conclusion that the emerging Brent Local Plan is not likely to have significant effects on the qualifying features and integrity of the identified European sites*”. Natural England then commented on the Local Plan at Publication Stage (Regulation 19), but did not provide any further comments specifically on the HRA.

The Planning Inspectors, as part of the examination process, have requested that the council confirm with yourselves that you are still happy with the HRA and the conclusions of the HRA? The submission version of the HRA can be found here, from page 503 onwards:  
[https://www.brent.gov.uk/media/16415880/core\\_gen\\_02-ii-integrated-impact-assessment-sustainability-appraisal-and-hra.pdf](https://www.brent.gov.uk/media/16415880/core_gen_02-ii-integrated-impact-assessment-sustainability-appraisal-and-hra.pdf)

Please also note that the council is proposing some modifications to the HRA since the publication version, which are shown below:

Document	Paragraph Number or Section	Modification Proposed	Reason
IIA	Page 504, Table 25, para. 2.4. Stage 1-Screening, under 'Progress Made'	Add a paragraph "At Publication Stage, the policy screening was updated to take into account new policies or amendments to policies."	To acc respe
IIA	Page 504, Table 25, para.2.4, Stage 1, Screening, under 'Progress Made'	Add a further paragraph "At Submission Stage, the screening assessment was updated to take into account lower London Plan targets (due to the Intend to Publish London Plan being published in December 2019) and progress being made to the Local Plans identified in Table 31".	To tak Intenc 2019) table 3
IIA	P.504, Table 25, Stage 2, under 'Description of Stage'	Complete the sentence ending 'an' as follows: (an) any adverse effects on the integrity of sites which have been identified as having likely significant effects at Stage 1".	Correc
IIA	P.505, Table 26, para. 3.3	Remove reference to Stage 2 – Appropriate Assessment, and all tasks to be collated under Stage 1.	Due to under exerci
IIA	Page 514, para 5.1	Amend the figure "1,680" to "1,920"	To ref SHMA
IIA	Page 525, paragraph 7.1	Amend "three" to "five"	This n identifi sectio
IIA	P.533, paragraph 8.6	Add a point after para 8.6 to state "the Inspectors' Report for the Intend to Publish London Plan confirms that subject to the panel's recommendations, the draft London Plan meets the requirements of the Conservation and Habitats Species Regulations 2017 and relevant policy and guidance. Additionally, the associated Habitats Regulations Assessment Report 2019 confirms that following amendments to London Plan policy, sufficient protective mechanisms are in place to ensure the growth objectives of the London Plan can be delivered without adverse effect on the integrity of European sites."	As the Londo meets

As the examination hearings are currently taking place, we'd be grateful for a response as soon as possible.

Kind Regards,

Charlotte Ashton  
Planning Assistant  
Regeneration & Environment  
Brent Council

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@Brent\_Council

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