

Paul Lewin  
Team Leader Planning Policy  
Brent Council  
Engineers' Way  
Wembley  
HA9 0FJ

30 July 2021

Dear Mr Lewin

### **LB Brent Draft Local Plan – Main Modifications 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.

The Trust and the Council agreed a Statement of Common Ground prior to the examination of the plan following the Trust's comments on the Regulation 19 (Proposed Submission) version.

The Trust has no soundness concerns to raise in relation to the proposed Main Modifications, which, in relation to the Trust's waterways, primarily involve formatting changes of relevant policies with no significant impact on how they should be applied (MM83 to MM89, for example). We support:

#### **London and South East**

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Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB

- MM3, which includes the addition of ‘Enhancing the capacity of existing green and blue infrastructure such as Welsh Harp, the river Brent corridor and Grand Union Canal across a range of needs, including recreation, biodiversity and climate change’.
- MM23, which includes the addition of ‘To improve the setting and attractiveness of the Welsh Harp as a recreational and wildlife asset’ as an opportunity within the ‘East’ area.
- MM25, which identifies that Staples Corner master planning will involve key stakeholders. As the owner of the Brent Reservoir, we look forward to working with the Council to identify appropriate waterside uses and opportunities to improve environmental quality in this area.
- MM27, which includes the addition of “The potential for tall buildings will be considered taking account of the need... not have a detrimental impact on the Brent Reservoir Site of Special Scientific Interest, reducing in scale towards its residential and open space edges”.

We hope that the Council will continue to engage with the Trust in relation to the “creation of informal recreation, good quality public realm along the canal and linking improved pedestrian and cycling routes” proposed in MM82. We have no concerns to raise about the principle of this addition.

#### Minor Modifications

MiM212 – We welcome the acknowledgement that the Grand Union Canal, the Brent Feeder Canal and the Welsh Harp Reservoir are non-designated heritage assets. In the interests of clarity for those (such as some developers) that may not be familiar with the borough, we suggest that a minor amendment could be made to this new para 6.6.30a as follows:

By 1820 there was not enough water to supply the canal, so under an Act of Parliament in 1819, the Regent’s Canal Company decided to dam the River Brent and create a reservoir (known as the Welsh Harp Reservoir or Brent Reservoir), an artificial lake, in order to guarantee a sufficient water supply.

MiM213 – we welcome acknowledgement of the fact that canal heritage deserves better recognition. The Trust would welcome continued engagement with the Council about how this can be achieved through the development process.

Yours sincerely,

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>