Appendix E Heritage Statement
BUILT HERITAGE STATEMENT

In respect of

Northfields
Alperton
London Borough of Brent

On behalf of

St George Developments Limited

CgMs Ref: RKS/JCH00135

Date: August 2017
<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>PAGE(S)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 INTRODUCTION</td>
<td>8</td>
</tr>
<tr>
<td>2.0 LEGISLATION, POLICY AND GUIDANCE</td>
<td>10</td>
</tr>
<tr>
<td>3.0 HISTORICAL BACKGROUND</td>
<td>32</td>
</tr>
<tr>
<td>4.0 SITE APPRAISAL</td>
<td>37</td>
</tr>
<tr>
<td>5.0 ASSESSMENT OF HERITAGE ASSETS</td>
<td>53</td>
</tr>
<tr>
<td>6.0 THE PROPOSED DEVELOPMENT</td>
<td>75</td>
</tr>
<tr>
<td>7.0 THE IMPACT OF THE PROPOSED DEVELOPMENT</td>
<td>76</td>
</tr>
<tr>
<td>8.0 CONCLUSIONS</td>
<td>80</td>
</tr>
</tbody>
</table>
EXECUTIVE SUMMARY

This report has been prepared by CgMs (part of the RPS Group) on behalf of St George Developments Limited. It considers the proposed development of a 9.15 hectare (ha.) site within the administrative boundary of the London Borough of Brent. The purpose of the report is to assess whether the proposed development might lead to any significant direct or indirect effects on built heritage assets, on the site or in the wider vicinity.

The site comprises a 9.15 ha. triangle of industrial land, bounded to the south-east by the North Circular Road, to the south-west by the Grand Union Canal (Paddington Branch) and to the north by Beresford Avenue. The site is further bisected by the River Brent. The area is overwhelmingly industrial in character, except for a triangle of land between the north side of Beresford Avenue and the West Coast Main Line, which is characterised by streets of late 1930s housing arranged in short terraces.

The site is included within The Alperton Masterplan, adopted as a Supplementary Planning Document to the Brent Council’s Local Development Framework (LDF) Core Strategy on 18 July 2011.

The site, currently utilised as an industrial estate within B1/B2 and B8 use classes, is currently designated as a Strategic Industrial Location by the GLA in the London Plan. The majority of the site is vacant but historically has been characterised by large low rise industrial buildings built c.1938 and after the Second World War. Occupiers on site include, but are not limited to, car workshops/car dealers, plant storage, metal fabrication and scaffold companies.

The Proposed Development will comprise 12 buildings (referred to as Buildings A, B, C, D, E, F, G, H, J, K, L and N) ranging in height from 5 storeys to 25 storeys. The buildings will be set within publicly accessible open landscaped areas, including public squares and gardens. Courtyard gardens and balconies will provide private and semi-private amenity space for residents.

The Proposed Development will provide up to 2,750 homes (a proportion of which will be affordable homes) and a proportion of commercial/employment floorspace (including A1-A5, B, D1 and D2 uses). Under croft car parking will serve residents of each building and it is anticipated that an energy centre will be provided as part of the proposals.

Phase 1 of the Proposed Development will be submitted in detail and will comprise the provision of circa 375 homes, a proportion of commercial/employment floorspace and a community centre. The remainder of the Proposed Development will be subject to an outline planning consent.
Highway works will be required to accommodate traffic associated with the Proposed Development e.g. to Beresford Avenue and the North Circular along with works to upgrade utilities infrastructure as required.

Paragraph 128 of the National Planning Policy Framework (NPPF) requires applicants to describe the significance of any heritage assets which may be affected by a proposed development, including any contribution made by their setting. Historic England defines setting to be 'the surroundings in which a heritage asset is experienced'. In accordance with its guidance, this report seeks to determine the significance of nearby built heritage assets and the extent (if any) to which the proposed changes within the Site will affect that significance and thus lead to effects on heritage that would be material in planning terms or 'significant' in EIA terminology.

Relevant designated and non-designated built heritage assets within the Site and within a 5km radius are considered. All listed buildings and locally-designated built heritage assets within 1km of the site are considered. In addition, because of the height of the tallest elements of the proposed development, Registered Parks (all grades) and Grade I and II* Listed buildings are considered, up to a radius of 5km.

This report fulfils the requirements of the NPPF by providing an assessment of these designated heritage assets and an assessment of the impact of the proposed development upon them.

This study has found that the local area was substantially characterised by comprehensive low-rise industrial and residential development stimulated by the opening of the North Circular Road in 1933. The established character of 1930s ‘bypass development’ started to be eroded in the 1960s, with some localised redevelopment and a small number of 10- to 20-storey buildings. Locally the area was subject to substantial change with the widening and realignment of the North Circular Road in 1993.

There are no nationally or locally designated built heritage assets on the site itself, most of which has been recently cleared of standing buildings. To the immediate east of the site, it is nevertheless adjacent to a small number of nationally designated and locally designated heritage assets, including the locally-listed early-post-war Ace Café, the Grade II Brent Viaduct (c.1837, by Robert Stephenson) and a pillbox recorded on the Greater London HER. These, together with the undesignated Heather Park House and former Rizla House (now Trading Post) form part of a small area of surviving ‘North Circular’ bypass landscape at the junction of the old course of the North Circular road and Beresford Avenue. Given its present appearance, the site does nothing to enhance the wider setting or heritage significance of any of these assets, all of which are dominated to a greater or lesser extent by the post-1993 North Circular Road and the 1960s, 21-storey Wembley Point, which lies 430 metres east of the site.
As regards neighbouring heritage assets, the site is also bounded on its western side by the Grand Union Canal (Paddington Branch), opened 1801. Unusually, whilst the canal is designated as a conservation area in neighbouring Ealing (and indeed in most other London Boroughs through which it passes), that part in Brent, including the part that bounds the site, remains undesignated. It is nevertheless a non-designated heritage asset, as is the River Brent (or Twyford) Aqueduct that abuts the site. Given the degraded current setting, the proposed development has the potential to significantly enhance the setting of both the (undesignated) aqueduct and the (undesignated) canal itself. No significant adverse effects would be likely.

The only other heritage assets within a 1km radius of the site are a locally-listed canal cottage 530m S. of the site and a cluster of Grade II Listed buildings 310m to 700m S.W. of the Site on the site of the historic Twyford Manor, viz the early 19th-century Gothic Twyford Abbey, its walled Kitchen Garden Walls and the Church of St Mary, Brentmead Gardens, the latter comprising a 1958 church whose chancel is an 18th and early 19th-century single-cell chapel formerly associated with Twyford Abbey and the precedent manor house on its site. Apart from a fragment of surviving parkland surrounding the house, all of these assets are largely subsumed by 1930s and modern suburban development and abutted on the north side by the now-widened North Circular Road. Twyford Abbey and its park are derelict and the Listed house and garden walls are inscribed on the Heritage at Risk Register. They are currently subject to a scheme to revive them as a new secondary school, a scheme that includes two large new buildings within the surviving parkland. Because of its height, the taller parts of the proposed development may be visible in some local views of these assets, but because of the existing setting, ongoing development proposals and existing large buildings nearby, no significant adverse effects on the heritage significance of any of these locally-listed or Grade II-Listed assets are predicted.

Because of its height, the proposed development has the potential to be visible over a wide area. Because of the low-lying topography of the site and the valley of the River Brent and because of the extensively built-up nature of the area, much of the wider 5-km radius search area is devoid of long-distance views from public vantage points, with even the 21 storey Wembley Point tower-block 430m east of the site being largely invisible except generally in the most local of views. The Brent valley is surrounded by higher vantage points, notably Hampstead Heath and Golders Hill (up to 7km north-east), Harrow on the Hill (4.5km north-west), Hangar Hill (1.5km south-west) and Horsenden Hill, Greenford (2.5km west). Many of these have heritage assets on them, some of the highest importance and historically most surrounding development has been low-rise. There are nevertheless a number of tall developments in the vicinity of the site, some dating from the 1960s / 70s, but generally of much more recent origin. Thus
outward views from these higher places are already affected not only by extensive low-rise 20th-century development within their wider surroundings, including the Park Royal Industrial Estate. These views are also impacted by significantly taller structures in the landscape, including the arch of Wembley Stadium and other modern high-rise developments such as that of up to 17 storeys around the Stadium on Wembley Hill (1.5km north of the site), blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (650m – 950m west of the site), a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station, a cluster of 8-storey blocks of flats and commercial buildings on the regenerated Guinness site on the lower flanks of Hangar Hill (650m south-west of the site), the 10-storey Travel Lodge and Crown House blocks just west of the site and by the 21-storey Wembley Point, the latter some 430m east of the site.

Whilst the proposed development will be distantly visible from these high natural vantage points and from some of the heritage assets upon them, no significant effects are predicted, because of existing impacts. Further, no obvious built heritage assets with which the proposed development might compete for dominance (e.g. church spires or steeples) were noted between these high vantage points and the site. Thus, no significant adverse effects are predicted on designated or undesignated built heritage assets in the wider vicinity of the site.

In conclusion, despite the height of the proposed development, its low-lying nature and the height of surrounding vantage points, it would currently appear that the proposed development is unlikely to result in any significant adverse effects on built heritage assets or their settings.
1.0 **INTRODUCTION**

1.1 This report has been prepared by CgMs (part of the RPS Group) on behalf of St George Developments Limited. It considers the proposed development of a 9.15 ha. site within the administrative boundary of the London Borough of Brent.

1.2 The site comprises a triangle of industrial land, bounded to the south-east by the North Circular Road, to the south-west by the Grand Union Canal (Paddington Branch) and to the north by Beresford Avenue (Figures 1 and 2). The site is further bisected by the River Brent. The area is overwhelmingly industrial in character, except for a triangle of land between the north side of Beresford Avenue and the West Coast Main Line, which is characterised by streets of late 1930s housing arranged in short terraces.

1.3 The site is included within The Alperton Masterplan, adopted as a Supplementary Planning Document to the Brent Council’s Local Development Framework (LDF) Core Strategy on 18 July 2011.

1.4 The site, currently utilised as an industrial estate within B1/B2 and B8 use classes, is currently designated as a Strategic Industrial Location by the GLA in the London Plan. The majority of the site is vacant but historically has been characterised by large low rise industrial buildings built during and after the Second World War. Occupiers on site include but are not limited to car workshops/car dealers, plant storage, metal fabrication and scaffold companies.

1.5 The Proposed Development will comprise 12 buildings (referred to as Buildings A, B, C, D, E, F, G, H, J, K, L and N) ranging in height from 5 storeys to 25 storeys. The buildings will be set within publicly accessible open landscaped areas, including public squares and gardens. Courtyard gardens and balconies will provide private and semi-private amenity space for residents.

1.6 The Proposed Development will provide up to 2,750 homes (a proportion of which will be affordable homes) and a proportion of commercial/employment floorspace (including A1-A5, B, D1 and D2 uses). Under croft car parking will serve residents of each building and it is anticipated that an energy centre will be provided as part of the proposals.

1.7 Phase 1 of the Proposed Development will be submitted in detail and will comprise the provision of circa 375 homes, a proportion of commercial/employment floorspace and a community centre. The remainder of the Proposed Development will be subject to an outline planning consent.
1.8 Highway works will be required to accommodate traffic associated with the Proposed Development e.g. to Beresford Avenue and the North Circular along with works to upgrade utilities infrastructure as required.

1.9 This assessment has been prepared in compliance with the National Planning Policy Framework and the Brent Council’s Local Development Framework (LDF) Core Strategy, to identify and provide a description of the significance of built heritage assets in the vicinity of the Site and the likely effects of development on their significance.

1.10 Paragraph 128 of the National Planning Policy Framework (NPPF) requires applicants to describe the significance of any heritage assets which may be affected by a proposed development, including any contribution made by their setting. Historic England defines setting to be ‘the surroundings in which a heritage asset is experienced’. In accordance with its guidance, this report seeks to determine the significance of nearby built heritage assets and the extent to which the proposed changes within the Site will affect that significance.

1.11 Relevant designated and non-designated built heritage assets within the Site and within a 5km radius are considered. All listed buildings and locally- designated built heritage assets within 1km of the site are considered. In addition, because of the height of the tallest elements of the proposed development, Registered Parks (all grades) and Grade I and II* Listed buildings are considered, up to a radius of 5km.

1.12 This report fulfils the requirements of the NPPF by providing an assessment of these designated heritage assets and an assessment of the impact of the proposed development upon them.

1.13 Two stand-alone Archaeological Desk-Based Assessments explore potential below-ground (archaeological) issues (CgMs, June 2017(a) and CgMs, June 2017(b)).
2.0 **LEGISLATION, POLICY AND GUIDANCE**

2.1 The current policy regime identifies, through the National Planning Policy Framework (NPPF), that applications should consider the potential impact of development on Heritage Assets. This term includes both designated heritage assets, which possess a statutory designation (for example listed buildings, conservation areas, and registered parks and gardens), as well as undesignated heritage assets.

**Legislation**

**Planning (Listed Buildings and Conservation Areas) Act 1990**

2.2 Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.

2.3 The relevant legislation in this case extends from Section 16 of the 1990 Act which states that in considering applications for listed building consent, the local planning authority shall have special regard to the desirability of preserving the Listed Building or its setting or any features of special architectural or historic interest which it possesses.

2.4 Section 66 further states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

2.5 According to Section 69 of the Act a Conservation Area (CA) is an “area of special architectural or historic interest the character and the appearance of which is desirable to preserve or enhance”. It is the duty of Local Authorities to designate such areas and to use their legal powers to safeguard and enhance the special qualities of these areas within the framework of controlled and positive management of change.

2.6 Further to this Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing Conservation Areas and their setting. Further provisions are detailed in Section 74 of the Act.

2.7 Legislation regarding buildings and areas of special architectural and historic interest is contained within the Planning (Listed Buildings and Conservation Areas) Act 1990.
2.8 The relevant legislation in this case is set out in Section 66 of the 1990 Act, which states that special regard must be given by the planning authority in the exercise of planning functions to the desirability of preserving or enhancing listed buildings and their settings.

2.9 The meaning and effect of these duties have been considered by the courts in, including the Court of Appeal decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137. The Court agreed with the High Court’s judgment that Parliament’s intention in enacting section 66(1) was that decision-makers should give ‘considerable importance and weight’ to the desirability of preserving the setting of listed buildings.

2.10 Section 72 of the 1990 Act states that in exercising all planning functions, local planning authorities must have special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

**Enterprise and Regulatory Reform Act 2013**

2.11 The Enterprise and Regulatory Reform Act 2013 (ERRA) has made a number of changes to heritage legislation, including an amendment to the Planning (Listed Buildings and Conservation Areas) Act 1990 that provides two potential ways to be more precise about what is listed.

2.12 The changes allow a definitive statement about whether attached or curtilage structures are protected by the listing definition and/or to exclude from listed building consent objects that are fixed to a listed building.

2.13 It also allows a definitive statement that a part or feature of a listed building is not of special interest, for the purposes of listed building.

The need to obtain Conservation Area Consent for the demolition of an unlisted building in a Conservation Area in England is removed. Instead, such works now require planning permission. The need to obtain the consent of the local planning authority thus remains, but it is no longer be necessary to make two applications (one for planning permission and one for Conservation Area Consent) for a scheme involving the demolition and replacement of a building in a Conservation Area.

**National Planning Policy**

**National Planning Policy Framework (NPPF) (March 2012)**
2.14 The NPPF, published 27th March 2012, sets out the Government’s planning policies for England and how these are expected to be applied. It has purposefully been created to provide a framework within which local people and Local Planning Authorities (LPAs) can produce their own distinctive Local and Neighbourhood Plans reflecting the needs and priorities of local communities.

2.15 When determining Planning Applications, the NPPF directs LPAs to apply the approach of presumption in favour of sustainable development; the ‘golden thread’ which is expected to run through the plan-making and decision-taking activities. This encourages LPAs to approve development proposals that accord with the development plan without delay.

2.16 Where a development plan is absent, silent or out-of-date, permission should be granted except where adverse impacts would significantly and demonstrably outweigh those benefits, when assessed against NPPF policies as a whole; or where specific policies contained within the NPPF (including those with regard to designated heritage assets) indicate that development should be restricted to some degree.

2.17 Section 7 of the NPPF, ‘Requiring Good Design’ (Paragraphs 56 to 68), reinforces the importance of good design in achieving sustainable development by ensuring the creation of inclusive and high quality places. This section of the NPPF affirms, in Paragraph 58, the need for new design to function well and add to the quality of the area in which it is built; establish a strong sense of place; and respond to local character and history, by reflecting the built identity of the surrounding area.

2.18 Section 12, ‘Conserving and Enhancing the Historic Environment’ (Paragraphs 126-141) relates to developments that have an effect upon the historic environment. This is the guidance to which local authorities need to refer when setting out a strategy in their Local Plans for the conservation and enjoyment of the historic environment. This should be a positive strategy and should include heritage assets which are most at risk through neglect, decay or other threats. It is also noted that heritage assets should be conserved in a manner appropriate to their significance. For clarification, the NPPF provides definitions of terms relating to the historic environment. For the purposes of this report, the following are important to note:

Heritage asset: This is a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in
planning decisions. These include designated heritage assets and assets identified by the local planning authority; and

Significance: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

2.19 The NPPF advises local authorities to take into account the following points when drawing up strategies for the conservation and enjoyment of the historic environment, and when determining planning applications:

- The desirability of sustaining and enhancing the significance of heritage assets and preserving them in a viable use consistent with their conservation;
- The wider social, cultural, economic and environmental benefits that the conservation of the historic environment can bring;
- The desirability of new development in making a positive contribution to local character and distinctiveness; and
- Opportunities to draw on the contribution made by the historic environment to the character of a place.

2.20 Paragraph 128 of the NPPF states that LPAs, when determining applications for development, should require applicants to describe the significance of the heritage assets affected and the contribution made by their setting. Adding that the level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance.

2.21 According to Paragraph 129, LPAs should also identify and assess the significance of a heritage asset that may be affected by a proposal and should take this assessment into account when considering the impact upon the heritage asset.

2.22 Paragraphs 132 to 136 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 132 emphasises that when a new development is proposed, great weight should be given to the asset’s conservation and that the more important the asset, the greater this weight should be. It is noted within this paragraph that significance can be harmed or lost through the alteration or destruction of the heritage asset or by development within its setting.
2.23 Paragraph 134 advises that where a development will cause less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

2.24 The NPPF, therefore, continues the philosophy that was upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change. Historic England (formerly 'English Heritage') characterised this new approach, now reflected in the NPPF, as 'constructive conservation'. This is defined as 'a positive and collaborative approach to conservation that focuses on actively managing change... the aim is to recognise and reinforce the historic significance of places, while accommodating the changes necessary to ensure their continued use and enjoyment' (Constructive Conservation in Practice, English Heritage, 2009).

2.25 In Annex 2 of the NPPF Heritage Assets are defined as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority (including local listing). Notable examples of a designated heritage asset include: a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

2.26 Additionally, local planning authorities may identify what are referred to as undesignated heritage assets by drawing up Local Lists, through their conservation area appraisals process or through other means. In planning decisions, the effects of proposals on the significance of an undesignated heritage asset should be taken into account in determining the application, weighing the scale of harm or loss against the significance of the undesignated heritage asset (Paragraph 135).

2.27 A heritage asset not only has value to the current generation but to future generations too. An aspect of this value (or significance) is therefore conveyed as heritage interest, which may be categorised into an aesthetic, evidential, communal and/or historic interest. It is worth noting that the significance of a heritage asset derives not only from its physical presence, but also from its setting.
2.28 Architectural interest is defined as a building considered to be important for its architectural design, decoration and/or craftsmanship.

2.29 Historic interest is defined as a building considered to illustrate important aspects of social, economic, cultural or military history have close historical associations with nationally important people normally have some quality of interest in its physical fabric.

2.30 When making a listing decision, the Secretary of State may take into account the extent to which the heritage significance is allocated to a group of buildings principally defined as having Group Value.

**National Planning Guidance**

**National Practice Guidance (NPPG) (March 2014)**

2.31 This guidance has been adopted in support of the NPPF. It reiterates the importance of conserving heritage assets in a manner appropriate to their significance as a core planning principle.

2.32 It also states, conservation is an active process of maintenance and managing change, requiring a flexible and thoughtful approach. Furthermore, it highlights that neglect and decay of heritage assets is best addressed through ensuring they remain in an active use that is consistent with their conservation.

2.33 Key elements of the guidance relate to assessing harm. It states, an important consideration should be whether the proposed works adversely affect a key element of the heritage asset’s special architectural or historic interest. Adding, ‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar that may not arise in many cases. Essentially, whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the NPPF.

2.34 Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as ‘the surroundings in which an asset is experienced, and may be more extensive than the curtilage’. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
2.35 Importantly, the guidance states that if 'complete or partial loss of a heritage asset is justified, the aim should then be to capture and record the evidence of the asset’s significance, and make the interpretation publically available.'

**Conservation Principles, Policies and Guidance (Historic England, 2008)**

2.36 Conservation Principles outlines Historic England’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England’s own advice and guidance through the planning process, the document is recommended to local authorities to ensure that all decisions about change affecting the historic environment are informed and sustainable.

2.37 This document was published in line with the philosophy of PPS5, yet remains relevant with that of the current policy regime in the emphasis placed upon the importance of understanding significance as a means to properly assess the effects of change to heritage assets. The guidance describes a range of heritage values which enable the significance of assets to be established systematically, with the four main 'heritage values' being:

- **Evidential value:** which derives from the potential of a place to yield evidence about past human activity. It can be natural or man-made and applies particularly to archaeological deposits, but also to other situations where there is no relevant written record.

- **Historical value:** which derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It can be illustrative (illustrative of some aspect of the past) or associative (where a place is associated with an important person, event, or movement).

- **Aesthetic value:** which derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place, including artistic endeavour, or they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time.

- **Communal value:** which derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. Social value is associated with places that
people perceive as a source of identity, distinctiveness, social interaction and coherence. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of a place.

2.38 The Principles emphasise that ‘considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment’ (Paragraph 25).

**Historic Environment Good Practice Advice in Planning**

2.39 On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), ‘GPA1: Local Plan Making’ (Published 25th March 2015), ‘GPA2: Managing significance in Decision-Taking in the historic Environment’ (Published 27th March 2015) and ‘GPA3: The Setting of Heritage Assets (25th March 2015). A further document entitled ‘GPA4: Enabling Development’ is yet to be adopted.

2.40 The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

2.41 In addition to these documents Historic England has published three core Advice Notes (HEAs) which provide detailed and practical advice on how national policy and guidance is implemented. These documents include; ‘HEA1: Understanding Place: Conservation Area Designation, Appraisal and Management’ (25th February 2016), ‘HEA2: Making Changes to Heritage Assets’ (25th February 2016) and ‘HEA3: The Historic Environment and Site Allocations in Local Plans’ (30th October 2015). In addition to these ‘HEA4: Tall Buildings (10th December 2005), ‘Seeing the History in the View’ (31st May 2011) and ‘Managing Local Authority Heritage (2nd June 2003)’ provide further information and guidance in respect of managing change within the historic environment.

**Historic Environment Good Practice Advice in Planning: Note 1: The Historic Environment in Local Plans (2015)**

2.42 This document stresses the importance of formulating Local Plans that are based on up-to-date and relevant evidence in relation to the economic, social and
environmental characteristics and prospects of an area, including the historic environment, as set out by the NPPF. The document provides advice on how information in respect of the local historic environment can be gathered, emphasising the importance of not only setting out known sites, but in understanding their value (i.e. significance). This evidence should be used to define a positive strategy for the historic environment and the formulation of a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

2.43 Furthermore, the Local Plan can assist in ensuring that site allocations avoid harming the significance of heritage assets and their settings, whilst providing the opportunity to ‘inform the nature of allocations so development responds and reflects local character’.

2.44 Further information is given relating to cumulative impact, 106 agreements, stating ‘to support the delivery of the Plan’s heritage strategy it may be considered appropriate to include reference to the role of Section 106 agreements in relation to heritage assets, particularly those at risk.’ It also advises on how the heritage policies within Local Plans should identify areas that are appropriate for development as well as defining specific Development Management Policies for the historic environment. It also suggests that a heritage Supplementary Planning Document (SPD) in line with paragraph 153 of the NPPF can be a useful tool to amplify and elaborate on the delivery of the positive heritage strategy in the Local Plan.

**Historic Environment Good Practice Advice in Planning: Note 2: Managing Significance in Decision-Taking in the Historic Environment (March, 2015)**

2.45 This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that ‘development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places
if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.’

2.46 The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;

2. Understand the impact of the proposal on that significance;

3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;

4. Look for opportunities to better reveal or enhance significance;

5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and

6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

2.47 The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

2.48 This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

2.49 Crucially, the nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

2.50 This advice note focuses on the management of change within the setting of heritage assets. This document replaces ‘The Setting of Heritage Assets’ (English Heritage, March 2011) in order to aid practitioners with the implementation of national policies and guidance relating to the historic environment found within the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 document and does not present a divergence in either the definition of setting or the way in which it should be assessed.

2.51 As with the NPPF the document defines setting as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve’. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

2.52 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors including noise, vibration and odour, while setting may also incorporate perceptual and associational attributes pertaining to the asset’s surroundings.

2.53 This document provides guidance on practical and proportionate decision making with regards to the management of proposed development and the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects. It is stated that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting and that different heritage assets may have different abilities to accommodate change within their settings without harming the significance of the asset and therefore setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, noting that any approach should be
demonstrably compliant with legislation, national policies and objectives, Historic England recommend using the ‘5-step process’ in order to assess the potential affects of a proposed development on the setting and significance of a heritage asset, with this 5-step process continued from the 2011 guidance:

1. Identification of heritage assets which are likely to be affected by proposals;
2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset;
3. Assessing the effects of proposed development on the significance of a heritage asset;
4. Maximising enhancement and reduction of harm on the setting of heritage assets; and
5. The final decision about the acceptability of proposals.

2.54 The guidance reiterates the NPPF in stating that where developments affecting the setting results in ‘substantial’ harm to significance, this harm can only be justified if the developments delivers substantial public benefit and that there is no other alternative (i.e. redesign or relocation).

**Seeing the History in the View (English Heritage, May 2011)**

2.55 This document provides guidance relating to the assessment of heritage significance within views. It gives a method that can be applied to any view that is considered significant in terms of heritage. Historic England is currently in the process of revising this document to reflect the NPPF and recent case law.

2.56 Views provide an important role in shaping our appreciation and understanding of the historic environment. Some have been deliberately designed, such as at Greenwich Palace and Stowe Landscape Garden, whilst more often a significant view is formed of a ‘historical composite’, as a result of a long process of piecemeal development. Such views often contain focal buildings and landmarks which enrich daily life, attract visitors and help communities prosper.

2.57 This document states that the assessment of heritage significance within a view can be divided into two phases:

- Phase A Baseline Analysis: the following five steps assist in defining and analysing heritage significance within a view:
- Step 1: Establishing reasons for identifying a particular view as important;
- Step 2: Identifying which heritage assets in a view merit considerations;
- Step 3: Assessing the significance of individual heritage assets;
- Step 4: Assessing the overall heritage significance in a view; and
- Step 5: How can heritage significance be sustained?

Phase B: Assessment: assesses the potential impact of a specific development proposal on heritage significance within a view, as analysed in Phase A through the following steps:

- Development proposal;
- Establishing magnitude of impact on heritage significance; and
- Significance of Effect.

2.58 This document provides further information and guidance relating to feeding the Baseline Analysis into an ES Chapter if necessary.

Local Policy and Guidance

2.59 Many local planning policies (not only those for design and conservation) can affect development with regard to heritage assets. For instance policies on sustainable development, meeting housing needs, affordable housing, landscape, biodiversity, energy efficiency, transport, people with disabilities, employment and town centres can all have an influence on development and the quality of the environment. However, policies concerned with design quality and character generally take greater importance in areas concerning heritage assets. As aforementioned these policies, along with other matters, will figure in the on-going management of development in the given area.

2.60 The Site is within the London Borough of Brent. Hence, the Local Plan for this borough and the overarching strategic planning policies for London apply.
2.61 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport, and social framework for the development of London over the next 20-25 years. On 10 March 2015 the Mayor of London published the London Plan which re-placed the amended version of 2011.

**Policy 7.6: Architecture**

**Strategic**

Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

**Planning Decisions**

Buildings and structures should:

- be of the highest architectural quality
- be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- comprise details and materials that complement, not necessarily replicate, the local architectural character
- provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

**Policy 7.8: Heritage Assets and Archaeology**

**Strategic**

London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

**Planning Decisions**
Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

**LDF Preparation**

Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London’s environmental quality, cultural identity and economy as part of managing London’s ability to accommodate change and regeneration.

**Local Plan**

2.62 Brent's Local Plan is a collection of planning documents that, in conjunction with national planning policy and the Mayor’s London Plan, sets out our strategy for future development in Brent. This set of documents includes: Core Strategy (adopted 2010), Site Specific Allocations Development Plan (adopted 2011), and Brent’s Saved Unitary Development Plan Policies (adopted 2004). The Council have also published their Draft Development Management Policies Development Plan Document (DPD), setting out detailed polices which will be used to determine planning applications for development in the borough. Once adopted it will form part of the local plan and supersede saved UDP polices. The relevant polices within these documents are outlined below.

**Core Strategy (adopted July 2010)**

2.63 The Core Strategy sets out the vision, objectives, key policies and monitoring framework for future development in Brent. It also reflects community aspirations and provides an integrated approach to other important local strategies. The Core Strategy introduces the Alperton Growth Area as Core Policy CP7, stating that “The environment and the heritage of the canal will be the heart of the new community, providing amenity and connectivity. A series of public squares will be introduced along the waterside connected by a series of crossings – all delivered within a consistent and high quality public realm supported by the introduction and enhancement of areas of biodiversity and an extensive programme of tree planting. Connections will support pedestrians and cyclists, and improve access for new and existing communities to public transport interchanges, including the Alperton and Stonebridge Park.”
The Core Strategy does not have specific policies related to built heritage. Protection of heritage is nevertheless referred to at several points in the Core Strategy however, including under Strategic Objective SO9 (Protecting and Enhancing Brent's Environment), Core Policy CP 16 Town Centres and the Sequential Approach to Development and CP 17 Protecting and Enhancing the Suburban Character of Brent. Core Policy CP18 - Protection and Enhancement of Open Space, Sports and Biodiversity also refers to the importance of protecting the Borough’s waterways from inappropriate development and their preservation for the benefit, enjoyment, health and well-being of Brent’s residents, visitors and wildlife.

**Site Specific Allocations Development Plan Document (adopted 2011)**

The Site Specific Allocations Document Plan Document (DPD) allocates sites for specific land uses and sets out policies to guide their development. The DPD links to relevant policies within Brent’s community and core strategies. Whilst the Northfields Industrial Estate (the site) adjoins the eastern end of the Alperton Growth Area, as defined in the Core Strategy and Site Specific Allocations Document Plan Document (DPD) the Industrial Estate is not allocated.

**Alperton Masterplan Supplementary Planning Document (July 2011)**

The Alperton Masterplan Supplementary Planning Document (SPD) is part of the Brent Local Development Framework and is supplementary to the Brent Core Strategy 2010 and the Site Specific Allocations DPD 2011. The Alperton SPD was adopted by Executive in July 2011. The purpose of the masterplan is to set out in detail how the council will bring about the transformation of this industrial area into a new, mostly residential neighbourhood. It provides guidance for developers, landowners and residents about the scale of change which the council would like to see happen.

Unlike the Site Specific Allocations DPD 2011, The Alperton Masterplan SPD does include Northfields Industrial Estate, whilst noting that the London Plan designates the land as a Strategic Industrial Location. The Alperton Masterplan does not introduce a revised policy position for the land. The DPD nevertheless establishes three distinctive new neighbourhoods for the Alperton Growth Area, linked by the Grand Union Canal. These are:

- Alperton’s core: a cultural centre
The Alperton Masterplan contains no heritage policies. Section 7.1 ("A Canal Runs Through It") nevertheless contains a strong vision for the Grand Union Canal: "As you walk towards the canal from the cultural core of Alperton, you will encounter a series of green spaces, each with a different character, some active centres for play and gathering and others more tranquil spots for quiet relaxation. Along the canal a new waterside residential neighbourhood will emerge with conveniently located bridges across the canal, connecting communities either side with local facilities, such as a doctor’s surgery, library, learning centre, café, local jobs, and transport hubs. The industrial transition zone adjacent to Park Royal links the canal with a wider pedestrian and cycle network, through a new green corridor along the North Circular Road and Brent River Park, providing a pleasant and safe route through the area. The canal is one of Alperton’s unique assets and as such must be protected from inappropriate development and must be preserved for the benefit, enjoyment, health and wellbeing of Brent’s residents (CP18). Developments within the growth area will pay into a canal fund for works on the towpath side as part of a cohesive strategy to improve planting, furniture, surface and lighting. Improved access to the canal on the north side will be supported by the council. The council will also seek funding for specific projects including a lighting scheme at Manor Farm and Ealing Road canal bridges...”

**Development Management Polices Development Plan Document (November 2016)**

The Development Management Policies Development Plan Document (DPD) sets out detailed policies which are used to determine planning applications for development in the borough. The Council adopted the Development Management Policies DPD on 21 November 2016, superseding all saved UDP polices. As regards built heritage, the relevant polices are the following:

2.70 Policy DMP1 Development Management General Policy

Subject to other policies within the development plan, development will be acceptable provided it is:
a. of a location, use, concentration, siting, layout, scale, type, density, materials, detailing and design that provides high levels of internal and external amenity and complements the locality;

d. conserving or enhancing the significance of heritage assets and their settings;...

h. retaining existing blue and green infrastructure including water ways, open space, high amenity trees and landscape features or providing appropriate additions or enhancements;...

Heritage assets include a wide variety of statutorily designated and non-designated features. Some are protected by law and cannot be materially altered without consent, e.g. listed buildings and scheduled monuments. This statutory protection together with national planning policy also places a legal duty on the Council to seek to conserve or enhance the significance of such assets and their settings. As such, developments affecting a heritage asset will be required to show that it seeks to conserve or enhance its significance and its setting. (2.8)

Environmental assets such as blue and green infrastructure enhance the appearance, quality and bio-diversity of Brent, provide a recreational resource, improve air quality and reduce the potential impacts of climate change. As such wherever possible and in particular where they are of high quality they should be retained. In addition to this developments are encouraged to take every opportunity to provide additional features or where adjacent provide extensions to or enhance the setting of such features. (2.12)

2.71 Policy DMP7 Brent’s Heritage Assets

Proposals for or affecting heritage assets should:

a. demonstrate a clear understanding of the archaeological, architectural or historic significance and its wider context;

b. provide a detailed analysis and justification of the potential impact (including incremental and cumulative) of the development on the heritage asset and its context as well as any public benefit;

c. retain buildings, structures, architectural features, hard Landscaping and spaces and archaeological remains, where their loss would cause harm;
d. sustain and enhance the significance of the heritage asset, its curtilage and setting, respecting and reinforcing the streetscene, frontages, views, vistas, street patterns, building line, siting, design, height, plot and planform and ensure that extensions are not overly dominating;

e. contribute to local distinctiveness, built form, character and scale of heritage assets by good quality, contextual, subordinate design, and the use of appropriate materials and expertise, and improving public understanding and appreciation;

f. where demolition is proposed within a conservation area detailed plans for any replacement building will be required to allow consideration of whether the replacement would contribute positively to the character or will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures appearance of the area. In cases where demolition is permitted conditions and/or legal agreements will be applied to ensure construction of the approved scheme is implemented together with agreed mitigation measures.

2.72 Brent’s heritage assets make a substantial contribution to the borough’s local character and distinctiveness. They are a unique and irreplaceable resource which justifies protection, conservation and enhancement in a manner appropriate to their significance. The Council recognises and identifies both designated and non-designated assets through the planmaking or planning application process. It is acknowledged that they hold value to society at many levels and identification allows protection and consideration in planning decisions. (4.19)

2.73 Brent’s statutory listed buildings, conservation areas and registered parks and gardens are all designated heritage assets. Its locally listed buildings, areas of distinctive residential character, sites of archaeological importance and archaeological priority areas are non-designated heritage assets. Non-designated heritage assets include buildings, structures, monuments, earthworks, street furniture, sculpture, shopfronts, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decision stage. Guidance on Brent’s heritage assets, as set out in the local guidance box in this chapter, is available at www.brent.gov.uk/conservation. This guidance forms part of the Local Plan evidence base and will also be a material consideration in the determination of applications for development. Applicants should refer to these documents early
on to ensure that their proposals are based on an understanding of the significance of heritage assets that may affected. (4.20)

2.74 The purpose of this policy is to provide greater clarity on the specific additional requirements applicable in Brent taking account of existing NPPF, NPPG, London Plan, Brent Core Strategy policies and local evidence base. (4.21)

2.75 Brent’s heritage assets include a wide range of architectural styles from Victorian Italianate, Gothic Revival, suburban ‘Arts & Crafts’, ‘Tudorbethan’, ‘Old World’, Modern and Brutalist as well as planned ‘village’ settlements. Furthermore, its formal public gardens, cemeteries together with the trees and gardens in the 20th century residential developments have matured contributing to setting. (4.22)

2.76 Heritage assets are valued by the public as established and tangible evidence of the past culture, providing a sense of permanence and belonging. Once lost or detrimentally altered, heritage assets cannot easily be reinstated and it is important that the most valuable are not needlessly or inadvertently destroyed. Policy DMP7 therefore, specifically seeks to protect Brent’s heritage and ensure that the case for conservation and enhancement is fully considered when assessing all proposals for new development. The Policy also seeks to safeguard the potential for further investigation on sites and buildings where the heritage asset’s significance may be previously undiscovered. Archaeological Priority Areas and Archaeological Sites indicate where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. However, sites of archaeological importance could be discovered elsewhere in the borough. (4.23)

2.77 The Council supports and recognises that change is necessary, but change needs to be managed in a way which does not compromise heritage significance and exploits opportunities for enhancement. Any proposal must have special regard to the desirability of preserving a heritage asset or its setting or any features of special archaeological, architectural or historic interest which it possesses. When granting consent, special regard will be given to matters of detailed design, especially within main frontages, prominent elevations and roofs, and to the nature, quality and type of materials proposed to be used. This is because some forms of development, including extensions, roof extensions, dormers and outbuildings may not be subordinate (overly dominating) to the property, harming its character, integrity and appearance. It is also important to be mindful that even the most minor changes or
incremental alterations such as window replacement and the loss of original fittings and features can harm the significance of a property and a heritage asset. (4.24)

2.78 The Council will also require the identification of non-designated heritage assets, including building or structures contained on the Local List, archaeological priority areas, sites of archaeological importance and sites contained within the London Parks & Gardens Trust’s Inventory of Historic Spaces at the beginning of the design process for any development, especially where this may impact on their significance. (4.28)

2.79 The Council will resist significant harm to or loss of heritage assets. It will assess proposals which would directly or indirectly impact on heritage assets in the light of their significance and the degree of harm or loss which would be caused. Where the harm would be less than substantial, it will be weighed against any public benefits of the proposal, including securing optimum viable use of the heritage asset and whether it would enhance or better reveal the significance of the conservation area. (4.29)

Application Requirements

2.80 A Heritage Statement is required where a proposal is for or affects a heritage asset. It must describe and demonstrate a clear understanding of the significance of any heritage assets affected by proposals and the impact on their significance, including any contribution from their setting. The level of detail must reflect the importance of the asset and clearly identify the potential impact of the proposal. 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. (4.31)

2.81 The Development Management Policy DMP9 sets out policies for development beside the River Brent and Grand Union Canal:

**DMP9 Waterside Development**

2.82 The Council will promote the enhancement and use of the Blue Ribbon network: a. Proposals for development adjacent to river and canal edges are required to improve access to the waterways and provide an appropriate landscaped set-back which may include public open space. b. Developments adjacent to the Blue Ribbon network and other tributaries, or waterways with potential to negatively impact on its water quality will be required to contribute
towards restoration and naturalisation of waterways, and seek to enhance water quality and biodiversity in accordance with the objectives of the Water Framework Directive and Thames River Basin Management Plan.
3.0 HISTORICAL BACKGROUND

3.1 The early history of the Site and its surroundings is covered in detail in the accompanying Archaeological Desk-Based Assessment (Russel, Dr A.D., 2016).

3.2 The suite lies in the floor of the valley of the River Brent, between the historic settlements of Alperton (c.500m west), Twyford Manor (today’s Twyford Abbey) and Willesden (c.2km north-east). The settlement of West Twyford (1.5km north-west) is believed to have been established by the Saxon period. Residual pottery of possible Saxon date has been found at Twyford Manor (today’s Twyford Abbey), later the site of a medieval Moated Manor. It is thought that a small hamlet here was depopulated in 1086, prior to the foundation of the manor. During the Anglo-Saxon period the site probably lay in an area of pastureland between these various small settlements, although Domesday (dated 1086) makes reference to extensive tracts of woodland and a high number of pigs, the latter being indicative of largely wooded areas where tenant farmers enjoy the right of ‘pannage’ (pigs grazing beneath trees).

3.3 Alperton didn’t attain village status in the Later Medieval or Post-Medieval periods, the settlement comprising a nucleation of farmsteads. In 1199 the name was spelt ‘Alprintfen’ translating as a farm or estate in Ealhbeorht’s Territory. In 1316 the settlement remained of small size and was not tithed. Twyford Manor appears to have attained the status of a moated manor house around 1290.

3.4 John Rocque’s Map of London (Figure 3 dated 1766) shows the site lying within meadows south-east of the settlement of ‘Apperton’. No change is shown on the 1807 Ordnance Survey Drawing (Figure 4). A map of 1818 of the Harrow & Pinner Parishes (Figure 5) shows the site lying in the open field of Brent. In 1806 the owner of Twyford Manor, Thomas Willan, filled in the moat and employed William Atkinson (designer of, amongst other buildings, Chequers, Lismore Castle, Scone Palace, Bretton Hall, Hylands and walter Scott’s Abbotsford) to design a new Gothic Revival mansion, which Willan renamed Twyford Abbey (Plate 3.1).

3.5 Local communications were poor until the opening of the Grand Junction Canal in 1801, forming the study site’s western boundary. It is believed that at least the western part of the site the site was acquired by the Grand Junction Canal, a canal-side cottage (‘Canal Cottage’) being shown beside the canal on maps between 1864 (Figure 7) and 1955-7 (Figure 13). In 1837 Robert Stephenson’s
London & Birmingham Railway was opened c. 100m to the east of the site, crossing the Brent valley on a multi-arched brick viaduct.

3.6 During the nineteenth century the Alperton area became known for brick and tile production, with the products being transported into London via the canal. Despite increasing industrialisation, the major part of the site remains a pastoral landscape straddling the meandering course of the River Brent in the First Edition and Second Edition Ordnance Survey maps of 1864 and 1896 (Figures 6 and 7). Despite the improved communications, as late as 1845 Alperton was described as a ‘straggling place’ (Victoria County History), and in 1848 is described as a hamlet of only 242 inhabitants.

3.7 Significant changes occurred in the area in the opening years of the 20th Century. Circa 1902 Twyford Abbey ceased its life as a mansion, being acquired by the Alexian order of monks as a rest home for the elderly. The Third Edition Ordnance Survey map (Figure 8, dated 1914) shows extensive excavations on both sides of the Grand Union Canal, including most of the site, with the River Brent being canalised into its present straight course. The reasons for such extensive groundworks are unclear. The extensive disturbance depicted on the 1914 map may have resulted from the canalisation of the River Brent and the excavation for the water main (now owned by Thames Water) passing below the site from north-east to south-west, but clay extraction for brick-making seems a more plausible explanation for both the extensive excavations and the realignment of the River Brent.

3.8 The Revised Edition Ordnance Survey (Figure 9 dated 1936) shows the area surrounding the site on the cusp of substantial change. The most visible change is the construction of the North Circular Road along the site’s southern boundary. The North Circular Road was originally conceived as an unemployment relief scheme following the First World War. Built with two 27-foot (8.2 m) wide dual-carriageways, with 9-foot (2.7 m) verges, it was largely intended to stimulate the redevelopment of former munitions factories and ordnance depots in outer north-east and north-west London for new industrial purposes. The 1924 British Empire Exhibition at Wembley provided further stimulus to the construction of the road. The overall route ran on cheap land that allowed further factories to be built alongside. The road was an immediate success in terms of stimulating the development of new ‘bypass factories’ and by the end of the 1930s the area surrounding the Park Royal estate had become the largest industrial estate in the south of England. Together with extensions to
the tube network, also promoted to relieve unemployment, extensive suburban residential development took place, small parts of which are visible to the north-west and south-west of the site in the 1936 map (Figure 9).

3.9  Locally to the site, the new road passed under the West Coast Main Line utilising the main river span of the existing Brent Viaduct. An impressive concrete trunk aqueduct was built to carry the road under what had become by 1927 the Grand Union Canal (Plate 3.2). The 1936 Ordnance Survey map (Figure 9) and an aerial view of 1937 (Figure 10) nevertheless show the site and its surroundings still substantially undeveloped, with only a single plot at the south of the site and another at the far eastern end showing any signs of building activity being underway. An early addition, to the immediate east of the site, fronting onto the North Circular Road was the celebrated Ace Café, a transport café opened in 1938, to accommodate traffic on the new North Circular Road.

3.10  In contrast to the 1936 map and 1937 aerial view, the aerial photograph of 1938 shows much of the site and most of its surroundings now extensively developed. It would thus appear that the approaching Second World War may have been a possible stimulus to development in the area. As can be seen from the 1955-7 map (Figure 13), engineering was the predominant industry, although the western part of the site was dominated by a very large synthetic wood (fibreboard) plant and a small joinery works, whilst the north-eastern part of the site housed smaller leather and textile factories.

3.11  Further infilling took place between 1950 (Figure 12) and 1955 (Figure 13), such peacetime development including a ‘Cleaning Works’ at the north of the site, a large (metal)-plating works at the centre of the site, on the north bank of the River Brent, and, at the eastern end of the site, facing onto the North Circular Road, a large ‘Garage’, immediately west of the Ace Café, itself rebuilt in 1949 having been destroyed during an air raid on the nearby Willesden railway sidings. Because the cafe was open 24 hours a day, it started to attract motorcyclists after the end of the war, becoming something of a legend to the ‘Ton-Up Boys’ in the 1950s and the Rockers in the 1960s. The cafe closed in 1969, shortly after the opening of the Scratchwood Services at what was then the southern end of the M1 motorway. It reopened in 1997 and has maintained an extensive calendar of events for both motorbike and car owners. It is a locally listed building. In contrast, Twyford Abbey was listed in January 1973, most likely in response to a request from the Alexian order to have it demolished. The order abandoned it in 1988, and it has fallen into decay since.
3.12 With a few additions, the site remained relatively unchanged until 2008 (Figure 15), the major change being the widening of the North Circular Road on its south side in the alter 20th Century, including a new aqueduct carrying the Grand Union Canal and new bridges under the West Coast Main Line to the south of Stephenson’s original, now Grade II-Listed Brent Viaduct. By 2010 (Figure 16, Google Earth View) most of the buildings on the site had been demolished, a process that is now almost complete.

Plate 3.1: 1820 view of the west front of the Grade II-Listed Twyford Abbey, 1807-9 by William Atkinson (500m S.W. of the site), looking roughly north-east towards the site.
Plate 3.2: Views of the building and opening of the North Circular Road in 1933, including several views of the Stonebridge Park aqueduct over the new road.

Plate 3.3: April 1938 aerial view of the site and land to the west, showing the extensive development in the area in the wake of the opening of the North Circular Road in 1933.
4.0 **SITE APPRAISAL**

4.1 The Site (Figures 1 and 2) comprises 9.15 hectares of largely cleared former industrial land within the administrative boundary of the London Borough of Brent. The site is essentially triangular, bounded to the south-east by the old and realigned North Circular Road, to the south-west by the Grand Union Canal (Paddington Branch) and to the north by Beresford Avenue. The site is divided into two parts by the straight, canalised, east-west course of the River Brent. Most of the site now consists of concrete floor slabs and piles of crushed hardcore. Despite modern redevelopment of much of the 1930s industrial development that was built along the North Circular Road, the wider area around the site remains overwhelmingly industrial in character, except for a triangle of land between the north side of Beresford Avenue and the West Coast Main Line, which is characterised by streets of late 1930s housing arranged in short terraces (Plates 4.1 and 4.11). This residential area is characterised in the old Brent UDP as an ‘Area of Low Townscape Quality’. Small clusters of 1930s / 40s industrial and commercial buildings survive immediately outside the eastern end of the site (at the junction of Beresford Avenue, Heather Park Road and the North Circular Road – Plates 4.13 and 4.14). The best preserved group, and that of most interest is the first of these groups, comprising the former Rizla House (now Trading Post), Heather Park House and the Ace Café, which form a group with the Grade II Brent Viaduct over the old (1933) course of the North Circular Road (Plates 4.13 and 5.2).

4.2 Most of the industrial units that were formerly on the site have been demolished. There are seven buildings remaining within the northern part of the site, comprising a cluster of three small, late 1930s factory buildings at the north of the site, facing onto Beresford Avenue (Plate 4.10), three blocks of small, 1970s industrial units (Plates 4.2; Plates 4.5-4.6 and Plates 4.7–4.9), a 1970s gatehouse (Plate 4.3), a café of similar date (Plate 4.4) and the former Abbey Plating Works, dating to the 1950s, now used for car repairs (Plate 4.16). Two buildings remain on the south part of the site, facing onto the North Circular Road, the truncated remains of a 1950s car garage to the north-east (Plate 4.23) and the 1950s Stonebridge Foundry, extended in the 1960s as Capital House, a door and window business (Plate 4.24-4.25). None of these buildings is of significant heritage value.

4.3 The site contains no designated heritage buildings. Whilst the Grand Union Canal is designated as a conservation area in neighbouring Ealing (west and south-east of the site), that part lying in the Borough of Brent, including that part
which forms the site boundary is not designated (Plates 4.5, 4.19, 4.20, 4.26 and 4.27).

4.4 Lying in the floor of the Brent valley, the site is low-lying, with land rising towards Hampstead (7km north-east), Wembley Hill and Stadium (1.5km north) and Harrow on the Hill (4.5km north-west). Hangar Hill lies some 1.5km to the south-west. 2.5km to the west is Horsenden Hill, Greenford (Appendix 1). All of these have the potential for long views towards the site. Historically development within the Brent Valley and on its flanks has been relatively low-rise (Plate 3.3). There are nevertheless a number of tall developments in the vicinity of the site, some dating from the 1960s / 70s, but generally of much more recent origin. The most widely visible of these is Wembley Stadium on Wembley Hill (1.5km north of the site), with its adjacent hotels and flats of up to 17 storeys. Some 650m – 950m west of the site is a large cluster of blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area. Some 650m south-west of the site, on the lower flanks of Hangar Hill are the 8-storey blocks of flats and commercial buildings of the regenerated Guinness site. On the north side of the North Circular Road, some 100m to 220m south-west of the site are the 10-storey Travel Lodge and Crown House blocks, whilst some 2.2km south-east of the site is a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) recently constructed adjacent to North Acton Station. Also on the North Circular Road, some 430m east of the site is the 21-storey Wembley Point (Plates 4.17 and 4.22).
Plate 4.1: General view of the northern part of the site, looking east along Beresford Avenue, with the north-western part of the site on the right. The modern 2-storey warehouse building lies within the site.

Plate 4.2: General view of the modern 2-storey warehouse building within the north-eastern part of the site, as seen looking south-east from Beresford Avenue.
Plate 4.3: General view of the modern gatehouse building and 2-storey warehouse building within the north-eastern part of the site, as seen looking west from Beresford Avenue.

Plate 4.4: Modern café building to the south of the modern gatehouse building and 2-storey warehouse building within the north-eastern part of the site.
Plate 4.5: General view of the north-western part of the site, looking north up the Grand Union Canal. The modern 2-storey industrial units on the right lie within the site, on the site of the north-western part of the 1938 Fibre Board Works.

Plate 4.6: View from the site of the 1938 Fibre Board Works in the north-western part of the site, from the south-east, showing the modern 2-storey industrial units within the site, with Beresford Avenue distantly visible on right (Grand Union Canal to left).
Plate 4.7: View looking into the site from Beresford Avenue, showing further modern 2-storey industrial units at the centre of the site.

Plate 4.8: General view of the interior of the north-western part of the site, with the modern 2-storey industrial units at the centre of the site (on site of 1938 Cleaning Works) to centre and site of demolished 1938 Fibre Board Works to right.
Plate 4.9: View of the modern 2-storey industrial units at the centre of the site (on site of 1938 Cleaning Works), as seen from the south-west, with Wembley Stadium and 21-storey Wembley Point beyond.

Plate 4.10: View of three surviving 1930s / 50s factories within the north side of the Site, facing onto Beresford Avenue. In 1955 these are shown (left to right) as Warehouse, Warehouse and Joinery Works.
Plate 4.11: General view looking east along Beresford Avenue towards former Rizla House (now Trading Post), Heather Park House and Grade II Brent Viaduct, with the eastern end of the site on right.

Plate 4.12: General view of the north-eastern part of the site, with River Brent on left and Beresford Avenue on right. The former Abbey Plating Works on the left lies within the site. The low buildings at centre right are excluded.
Plate 4.13: General view of the north-eastern part of the site, with River Brent on right, looking east towards the Grade II Brent Viaduct, Heather Park House and 21-storey Wembley Point and (on left) former Rizla House.

Plate 4.14: General view of the north-eastern end of the site from Beresford Avenue, with River Brent centre left, the locally-listed Ace Café (excluded) on left and former Rizla House (now Trading Post) on right.
Plate 4.15: View looking west along the River Brent from Beresford Avenue, with the northern part of the site on right and the Ace Café (excluded) on left, looking towards the former Abbey Plating Works at the centre of the site.

Plate 4.16: former Abbey Plating Works at the centre of the site, looking north-east, with River Brent on right.
Plate 4.17: ‘Sunken road’ running west-east at the centre of the site, looking east towards former Abbey Plating Works (centre right) and Rizla House and 21-storey Wembley Point (centre left).

Plate 4.18: View of the empty footprint of the southern half of the 1938 Fibre Board Works, with the greenery around the canalised River Brent cutting across from the left and the Grand Union Canal on right.
Plate 4.19: View looking south-east along the Grand Union Canal on the western boundary of the site, with the empty footprint of the southern half of the 1938 Fibre Board Works on left, with the greenery around the canalised River Brent visible beyond.

Plate 4.20: View of the River Brent (or Twyford) aqueduct carrying the Grand Union Canal over the River Brent at the south-western corner of the site.
Plate 4.21: View from the south-east, looking into the southern side of the site from the now bypassed 1933 course of the North Circular Road, with locally listed Ace Café.

Plate 4.22: View of the eastern end of the southern part of the site (on left), as seen looking towards the Ace Café, Grade II Brent Viaduct and 21-storey Wembley Point from the old (1933) course of the North Circular Road.
Plate 4.23: View of the eastern end of the southern part of the site from the old (1933) course of the North Circular Road, looking west, showing the surviving western end of the 1930s Garage to the west of the Ace Café.

Plate 4.24: View of the western end of the southern part of the site from the old (1933) course of the North Circular Road, looking west, showing the 1950s/60s window and door works incorporating pitch-roofed 1938 former Engineering Works at the rear.
Plate 4.25: Detail showing the 1950s/60s frontage block of the window and door works at the western end of the southern part of the site.

Plate 4.26: View looking north-east along the North Circular Road, showing the 1993 replacement Stonebridge Park aqueduct, with the site just out of sight (to left) beyond.
Plate 4.27: View looking south over the Stonebridge Park aqueduct from the south-western corner. The coats of arms from the original 1933 structure are sited on the centre island of the aqueduct.
5.0 **ASSESSMENT OF HERITAGE ASSETS**

5.1 Paragraph 128 of the NPPF states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.

5.2 This section of this Heritage Statement identifies the heritage assets that may be potentially affected by the proposed development and assesses where their heritage significance lies.

5.3 The site itself contains no designated or non-designated heritage assets and there are few within 1km of the site. All designated and non-designated built heritage assets within 1km of the site are shown at Appendix 1.

5.4 There are no built heritage assets of any significance on the site itself.

**Built Heritage Assets within 1km of the site (Appendix 1)**

**Brent Viaduct (Grade II) (85m N.E. of the Site) (Plates 5.1 - 5.4)**

5.5 The Brent Viaduct is much the closest designated heritage asset to the site. It was built c.1837 by Robert Stephenson to carry the London & Birmingham Railway over the River Brent. Of stock brick with stone details, it comprises a large-span brick central arch over North Circular Road (formerly over River Brent) framed by brick pilasters with modillioned capitals, with smaller side arches to either side (Plate 5.1). It is significant as a railway viaduct dating to the beginning of the 'heroic age' of development of the railway network in England, which saw the establishment of many of the principal inter-city railway routes.

5.6 As well as subsequently being widened on its east side, the viaduct’s setting has changed substantially over time, with a further six parallel viaducts being built to the east (Plate 5.1), and then the culverting of the River Brent to allow the insertion of the North Circular Road through the main span of all of them in 1933, followed by subsequent industrial development. The fabric and setting of the all of these viaducts has been affected by the cutting of the modern course of the North Circular Road immediately to the south in 1993 (Plate 5.2). Despite the loss of its original pastoral setting, and the modern realignment of the North
Circular Road to the south of its original course, the viaduct remains an important element of a small area of coherent 1930s / 1940s ‘North Circular’ heritage streetscape at the junction of Beresford Avenue and the North Circular Road, including the locally-listed Ace Café and undesignated former Rizla House (now Trading Post) and Heather Park House.

5.7 At the north-west corner of the Listed viaduct is a Second World war pillbox, identified on the Greater London Historic Environment Record (GLHER) (Plate 5.4).

**Twyford Abbey and Kitchen Garden Wall north of Twyford Abbey (Grade II) (310m to 700m S.W. of the Site) (Plates 5.5 – 5.11)**

5.8 There has been a house on the site of Twyford Abbey since around 1290. It has, at times, been a manor house, a farmhouse and a mansion surrounded by a moat. The present house is a cement-fronted “Gothic” former country house, built 1807-9 by William Atkinson, for a stagecoach proprietor from the City of London and farmer, Thomas Willan (Plate 3.1). Atkinson (1773-1839) trained under Thomas Wyatt before becoming architect to the Board of Ordnance until 1829, and for whom he designed the Ordnance Office in Pall Mall. Known principally as a country house architect, and particularly in Scotland, he excelled in alterations to existing buildings adding, for example, classical wings to Broughton Hall (Yorks) and Tudor additions to Chequers (Bucks). Atkinson was also known as the inventor of a form of Roman cement, which was possibly used at Twyford Abbey and in the dressings of the nearby Church of St Mary (below).

5.9 In 1902 the house was acquired by the Alexian order of monks for use as a rest home for the elderly and was substantially enlarged 1904. Large areas of the estate were sold off for development from the 1930s and the house, walled kitchen garden and the remaining part of the park found themselves increasingly sandwiched between streets of semi-detached housing to east and west (Meagh Gardens and Breatmead Road), the busy North Circular Road (to the north) and the large Guinness factory and associated parkland to the south. Today the north side of the gardens face across the North Circular Road towards the 10-storey Travel Lodge and Crown House blocks (Plate 5.9). Redevelopment associated with the closure of the Guinness factory has resulted in the south side of the gardens being overlooked by an estate of apartment blocks of up to 8 storeys and a park on the south side of Twyford Abbey Road (Plate 5.8).
5.10 Following Listing in 1973, the order abandoned the building in 1988. It is currently in a serious state of disrepair and is included on the Heritage at Risk Register. The architectural practice Walters & Cohen has recently won an invited competition to design a new secondary school on the site. The proposal for the site refurbishes the Listed buildings for administrative and sixth form use, and introduces two large new, 3-storey teaching blocks, one in the east side of the park and another running the length of the North Circular Road frontage. Most of the park, including the historic walled garden, open parkland and mature woodland, will be retained (Plate 5.11).

**Church of St Mary, Brentmead Gardens (Grade II) (570m S.W. of the Site)**
(Plates 5.12 - 5.13)

5.11 The only other designated asset within 1km of the site is the Church of St Mary, located in the suburban Brentmead Gardens, immediately west of Twyford Abbey. The most visible part of the church is the large modern (1958) nave that fronts onto Brentmead Gardens. Designed by NF Cachemaille-Day, this is built in buff brick with concrete slab roofs, in a rather severe interpretation of a Perpendicular church.

5.12 Tucked behind the large modern nave (Plate 5.12), now acting as a chancel, is a two-bay, single cell, cement-faced “Gothic” chapel, built in 1808 by William Atkinson for Thomas Willan, encasing a previous, probably 17th-century, brick-built chapel. A church was first recorded at Twyford in 1181, linked in the medieval period with the manor, which in turn was owned by St Paul's Cathedral. In 1636 the manor was acquired by the Moyle family who appear to have rebuilt or remodelled the church in the 17th Century. Outside the church, to the S lies a damaged stone tablet, to Walter Moyle and his two sons Robert and Francis (1660).

5.13 NF Cachemaille-Day FRIBA (1896 -1976) was a prolific church architect from the 1930s to 1950s. He produced some notable and forward thinking churches during the 1930s, including the church of the Epiphany, Leeds of 1936-8 (Grade I), and St Michael and All Angels Wythenshawe built in 1937 (Grade II*). Post-war churches include All Saints, Feltham (Grade II) and St James, Clapham (Grade II), a further example of the experiments in concrete which typified his later work.

5.14 The church of St Mary is Listed at Grade II for the following principal reasons: *
Architectural interest: early C19 re-facing of an earlier chapel to complement the
Gothic remodelling of Twyford Abbey; post-war enlargement in stripped-down Perpendicular manner by a noted church architect; * Monuments and sculpture: C17 wall monuments, many to the Moyle family; 1958 Virgin and Child by Kathleen Parbury; * Historic interest: continuous occupation of a medieval manor and church site, now within suburban London, fashionably gothicised c1800, and enlarged to accommodate the mid-C20 expansion of the church congregation.

5.15 Apart from on its east side, where its plot adjoins that of Twyford Abbey, the setting of the church comprises streets of 1930s ‘mock-Tudor’ semi-detached suburban homes. The best view of the church is from the south east, along the length of Huxley Gardens (Plate 5.13), which is orientated towards the west front of Cachemaille-Day’s nave, with Twyford Abbey and its mature trees behind. The earlier chapel, now the chancel, is very much concealed from view, but accessible from the surrounding burial ground.

Ace Café, North Circular Road (Local List) (10m east of the site) (Plates 5.14 – 5.15)

5.16 Located on the corner of the North Circular road and Beresford Avenue adjacent to the east end of the site is the locally-listed Ace Café. The café originally opened in 1938 for lorry drivers and motorists. It was rebuilt in suitably modernist style in 1949, after being destroyed in an air-raid and became a favourite haunt of ton-up boys and rockers. Closed in 1969 after the opening of the Scratchwood Services on the M1 the ground floor became a tyre sales and fitting shop. The cafe was reopened in 1997, with complete refurbishment completed by 2001. It now has an extensive calendar of events for both motorbike and car owners, hosts live music and DJs, and is approved for weddings and civil partnerships.

5.17 Despite the realignment of the North Circular Road to the south of its original course and extensive demolition nearby, the Ace Café remains an important element of an area of coherent 1930s / 1940s ‘North Circular’ heritage streetscape at the junction of Beresford Avenue and the North Circular Road, including the undesignated former Rizla House (now Trading Post) and Heather Park House and the Grade II Brent Viaduct over the old (1933) course of the North Circular Road (Plate 5.15).
Canal Cottage, Twyford Abbey Road (Local List) (530m S. of the site) (Plates 5.16 – 5.17)

5.18 The only other locally-listed building with the potential for material effects caused by the proposed development is a canal-side cottage located between Twyford Abbey Road and the southern bank of the Grand Union Canal, some 530 metres south of the site. The building, which is of mid-Victorian date, is one of the few heritage assets on the part of the canal in Brent Borough, itself probably the only part of the Grand Union Canal not yet designated as a conservation area. Whilst the building retains its important relationship to the canal itself (Plate 5.16), the wider area has been subject to extensive modern industrial development, including the area between the canal and the site (Plate 5.17).

Other Locally Listed Buildings within 1km of the site

5.19 Brent maintains an extensive local list, which includes several buildings within 1km of the site on the Harrow Road and in Alperton. Because of extensive modern development in much closer proximity to these buildings than the site itself, it is considered that none of these could be subject to material impacts from the proposed development.

Built Heritage Assets on the Greater London HER within 1km of the site

5.20 The Greater London Historic Environment Record lists two built heritage assets within 1km of the site. These are a bridge carrying Abbey Road over the Grand Union Canal (MLO73090, 550m from the site) and a Second World War pillbox on the north-western abutment of the Brent Viaduct, overlooking the North Circular Road (MLO105616). The former, identified from historic maps, is a modern reinforced concrete structure of no heritage interest (Plate 5.18). The pillbox (Plate 5.4) adds interest is to the Grade II-Listed viaduct and forms an element of the area of coherent 1930s / 1940s ‘North Circular’ heritage streetscape at the junction of Beresford Avenue and the North Circular Road, including the undesignated former Rizla House (now Trading Post) and Heather Park House, the locally-listed Ace Café and the Grade II Brent Viaduct.

Other Non-Designated heritage assets within 1km of the site

5.21 The only other non-designated heritage asset with any form of policy protection within 1km of the site is the Grand Union Canal. As mentioned above, unlike within Ealing Borough, the canal is not designated as a conservation area where it passes through the Borough of Brent (Appendix 1). Planning policy in both
Brent and Greater London nevertheless seeks the enhancement of the rivers and canals of London, including their banks, towpaths and wider settings.

5.22 Since the replacement of the 1933 reinforced concrete Stonebridge Park aqueduct over the North Circular Road in 1993 (Plates 3.2, 4.26 – 4.27), the only canal structure of heritage interest on or near the site is the River Brent (or Twyford) aqueduct, carrying the canal over the River Brent, on the western boundary of the site (Plate 5.19). This large brick arch, which dates to the construction of the canal c.1799, is substantially hidden from public view and is marred by cement render. It is nevertheless claimed to be “the second largest aqueduct on the waterways of south east England” (the adjacent 1993 aqueduct being the largest). The 1993 aqueduct retains the coats of arms from the 1993 aqueduct on a island mid-channel (Plate 5.20).

**Built Heritage assets more than 1km from the site (Appendix 1)**

5.23 Because of the proposed maximum height of the proposed development, it has the potential to be visible over a wide area. Assets of the highest importance (Scheduled Monuments and Grade I and II* Listed buildings) and assets whose open nature might make the liable to distant visual impacts (conservation areas and parks and gardens) have thus been plotted at Appendix 1 to a distance of 5km from the site.

5.24 Because of the low-lying topography of the site and the valley of the River Brent and because of the extensively built-up nature of the area, much of the wider 5-km radius search area is devoid of long-distance views, with even the 21-storey Wembley Point tower-block 430m east of the site being largely invisible except generally in the most local of views. There are nevertheless four nearby hills with significant heritage assets from which open views over the site are possible (Appendix 1). Each has been visited in order to establish whether the proposed development might result in significant effects, both to the assets on these high places themselves, or to any assets that may be visible from these high places.

Iron Age Settlement on Horsenden Hill, Greenford (3km W. of the site)
(Appendix 1 and Plates 5.21 – 5.24)

5.25 Horsenden Hill, Greenford, is one of the highest points in the area, rising to 85m / 276 ft above sea level. It maintained as open space by the Sudbury Golf Course and, despite belts of tree-planting on its summit and flanks, there are a number of open views in all directions, including on clear
days inwards to the City and outwards to the home Counties of Surrey, Berkshire and Buckinghamshire. More local views include views south towards north towards Harrow on the Hill, south over the Grand Union Canal and Perivale towards Hangar Hill and east towards Hampstead Heath and Golders Hill. All of these local views are characterised by 20th-century suburban and industrial development. On the summit of the hill are vestigial earthwork remains of a former Iron Age settlement, covering a semi-circular area of more than 150m in diameter. There are visible traces of probable defensive ditches and banks on the west and south sides of the hill, which appear as slight undulations in the ground surface (Plate 5.21). According to the statutory description, further earthworks relating to the settlement are likely to survive as buried remains, having become part-levelled and infilled in the past.

5.26 There are extensive views east over the Brent Valley towards the site (Plates 5.22 – 5.24). These views are dominated by Wembley Stadium and the modern high-rise development of up to 17 storeys around it on Wembley Hill (1.5km north of the site) (Plate 5.22). Also highly visible are the cluster of blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (650m – 950m west of the site), a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station, the 8-storey blocks of flats and commercial buildings of the regenerated Guinness site on the lower flanks of Hangar Hill (650m south-west of the site) and, in the far distance, the 21-storey Wembley Point (430m east of the site) (Plates 5.22 – 5.24). No obvious built heritage assets such as church spires or steeples are visible in the direction of the site with which the proposed development might compete for dominance.

Hangar Hill Conservation Areas (1.2 to 3km S.W. of the site) (Appendix 1 and Plates 5.25 – 5.26)

5.27 The summit and flanks of Hangar Hill are characterised by high-quality, leafy 19th- and 20th-century suburban development, much of which has subsequently been designated as ten discreet conservation areas of varying characters. Because of their relatively late date, there is only a single structure Listed at a higher grade, the Grade II* Church of St Peter on Mount Park Road, which has no spire or tower. Because of the pattern of built development and mature garden and street trees, street-level views outwards from the conservation areas are limited. There are clear views from Hangar Hill Park on Hillcrest Road, but these are substantially to the north and north-west, with the visually dominant Wembley Stadium and surrounding built development being
5.28 Because of the radial street-pattern, there are outward views to the north-east, east and south-east from within the Hangar Hill, Haymills Estate Conservation Area, although none of these narrow views down the radial streets is aligned on the site. Many views are locally dominated by the low-rise sheds of the Park Royal Industrial Estate at the foot of the hill, whilst the radial view down Rotherwick Hill is dominated by a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) recently constructed adjacent to North Acton Station (Plate 5.26). There are occasional glimpsed longer views between rooftops towards the site, but again these views are already affected by the high-rise residential and commercial developments mentioned above. Again, in such views as there are, no obvious built heritage assets such as church spires or steeples were noted with which the proposed development might compete for dominance.

Harrow on the Hill Conservation Areas and Listed buildings (4.5km to 5km N.W. of the site) (Appendix 1 and Plates 5.27 – 5.28)

5.29 Harrow Hill rises to 124 metres (407 ft) above sea level and is the highest vantage point within the 5km wider search area. On the hill and its flanks are seven conservation areas and a Registered Park, together with the numerous Listed buildings within the historic settlement of settlement of Harrow on the Hill, including the Grade II* Harrow School Chapel and Vaughan Library. There are glimpsed and open views from Harrow Hill in all directions. Views north-east are increasingly affected by a cluster of high-rise buildings of up to 21 storeys adjacent to the Northwick Park Underground station (1.5km N.W.) (5km N.W. of the site). Views south-east towards the site are strongly dominated by Wembley Stadium and the adjacent high-rise development on Wembley Hill (4.0km) (Plate 5.27 – 5.28). The 21-storey Wembley Point (430m east of the site) is just visible in such views, but forms a distant component in a view at the centre of the view, shown arrowed (Plate 5.28). Again, no obvious built heritage assets such as church spires or steeples were noted with which the proposed development might compete for dominance. No significant effects are thus predicted.
Plate 5.1: View from the south-west of the Grade II-Listed Brent Viaduct (85m N.E. of the Site), built c.1837 by Robert Stephenson to carry the London & Birmingham Railway over the River Brent. As well as subsequently being widened on its east side, the viaduct’s setting has changed substantially over time, with a further six parallel viaducts being built to the east, and then the culverting of the River Brent to allow the insertion of the North Circular Road through the main span of all of them in 1933.

Plate 5.2: View of the Grade II Brent Viaduct looking north-east along the 1933 course of the North Circular Road, with the 1993 course of the realigned and widened road to the right. On the left is the Junction with Beresford Avenue, with the locally-listed ace Café and un-designated Heather Park House. Clearly visible beyond is the 21-storey Wembley Point, 430m east of the site.
Plate 5.3: View looking south-west from the Grade II Brent Viaduct along the 1933 course of the North Circular Road, towards the locally-listed Ace Café and the site.

Plate 5.4: View of the Second World war pillbox on the north-western abutment of the Grade II Brent viaduct, identified on the Greater London Historic Environment Record (GLHER).
Plate 5.5: View of the west front of the Grade II Twyford Abbey, looking north-east towards the site from the burial ground of the adjacent Grade II Church of St Mary, Brentmead Gardens.

Plate 5.6: View of the south front of the Grade II Twyford Abbey, as seen looking north from Twyford Abbey Road, across the surviving parkland setting.
Plate 5.7: View of the modern gates and railings and un-Listed south gate lodge at the south-west corner of Twyford Abbey, as seen looking north from Twyford Abbey Road.

Plate 5.8: View of the parkland trees of Twyford Abbey, as seen looking north-east towards the site from the park and flats on the former Guinness site, looking over Twyford Abbey Road, with Wembley Stadium and the 10-storey Crown House and 21-storey Wembley Point on the North Circular Road visible beyond.
Plate 5.9: View of the remaining parkland of Twyford Abbey, as seen looking south over the North Circular Road. The 10-storey Crown House and Travel Lodge are out of view behind the camera.

Plate 5.10: View of the Grade II-Listed Garden Walls of Twyford Abbey and un-Listed garden building, looking south over the boundary fence on the North Circular Road.
Plate 5.11: Image of the Walters & Cohen design for the new secondary school at Twyford Abbey, looking south, with the North Circular Road to the right.

Plate 5.12: View of the Grade II-Listed Church of St Mary, Brentmead Gardens (570m S.W. of the Site), looking north-east towards the site, with NF Cachemaille-Day's nave largely hiding William Atkinson's cement-faced "Gothic" chapel (now the chancel) beyond. Part of the west front of Twyford Abbey is visible behind.
Plate 5.13: View of the Grade II-Listed Church of St Mary, Brentmead Gardens, looking north-east towards the site along Huxley Gardens.

Plate 5.14: View of the locally-listed Ace Café (10m E. of the site), looking west towards the site across the 1933 course of the North Circular Road.
Plate 5.15: View of the locally-listed Ace Café, looking north-east across the 1933 course of the North Circular Road, with Heather Park House, 21-storey Wembley Point and Grade II Brent Viaduct prominent.

Plate 5.16: View of the locally-listed Canal Cottage, Twyford Abbey Road (530m S. of the site), looking north-west towards the site.
Plate 5.17: View of the modern industrial development on the north bank of the Grand Union Canal opposite the locally-listed Canal Cottage, Twyford Abbey Road.

Plate 5.18: View of the canal bridge just to the east of the locally-listed Canal Cottage, Twyford Abbey Road. Whilst the bridge is inscribed on the Greater London HER (MLO73090) from historic maps, it is now a modern reinforced concrete structure.
Plate 5.19: The un-designated River Brent (or Twyford) aqueduct at the south-western corner of the site, built c.1799 for the opening of the (then) Grand Junction Canal (Paddington branch).

Plate 5.20: View of the un-designated 1993 Stonebridge Park aqueduct over the North Circular Road, showing the coats of arms recovered from the 1933 aqueduct.
Plate 5.21: View of the Scheduled Iron Age Settlement on Horsenden Hill, Greenford (3km W. of the site).

Plate 5.22: View from the eastern flank of Horsenden Hill below the Iron Age settlement, looking east towards the site, with Wembley Stadium prominent on the left (3km) (1.5km north of the site). Prominent on the right to are the cluster of blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (2km-3km) (650m – 950m west of the site) and high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station (5km) (1.5km S.E. of the site). Just visible at the centre of the view is the 21-storey Wembley Point (3.5km) (430m east of the site).
Plate 5.23: Telephoto view from the eastern flank of Horsenden Hill below the Iron Age settlement, looking east towards the site, showing the existing 21-storey Wembley Point (3.5km) (430m east of the site), with unidentified blocks of flats beyond.

Plate 5.24: View from the eastern flank of Horsenden Hill below the Iron Age settlement, looking south-east showing the cluster of blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (2km-3km) (650m – 950m west of the site) and high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station (5km) (1.5km S.E. of the site) beyond.
Plate 5.25: View looking out from Hangar Hill Park on Hillcrest Road, one of the few open area on Hangar Hill (2km from the site), with natural screening preventing views of all but the arch of Wembley Stadium.

Plate 5.26: View down Rotherwick Hill, the sole long-distance view looking out from the Hangar Hill, Haymills Estate Conservation Area. Highly visible over the low-rise Park Royal Industrial Estate is the high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station (1.25km) (1.5km S.E. of the site).
Plate 5.28: Zoomed-in version of the above image, with Wembley Stadium and adjacent development on Wembley Hill (4.0km) (1.5km north of the site) prominent. The 21-storey Wembley Point (5.5km) (430m east of the site) is just visible at the centre of the view, shown arrowed.

Plate 5.27: View south-east from the Harrow School Conservation Area (5km N.W. of the site) from the terraced garden immediately below the Grade II* Chapel and Vaughan Library, with Grade II Butler Museum (Science Schools) on left.
6.0 THE PROPOSED DEVELOPMENT

6.1 The Proposed Development will comprise 12 buildings (referred to as Buildings A, B, C, D, E, F, G, H, J, K, L and N) ranging in height from 5 storeys to 25 storeys. The buildings will be set within publicly accessible open landscaped areas, including public squares and gardens. Courtyard gardens and balconies will provide private and semi-private amenity space for residents.

6.2 The Proposed Development will provide up to 2,750 homes (a proportion of which will be affordable homes) and a proportion of commercial/employment floorspace (including A1-A5, B, D1 and D2 uses). Undercroft car parking will serve residents of each building and it is anticipated that an energy centre will be provided as part of the proposals.

6.3 Phase 1 of the Proposed Development will be submitted in detail and will comprise the provision of circa 375 homes, a proportion of commercial/employment floorspace and a community centre. The remainder of the Proposed Development will be subject to an outline planning consent.

6.4 Highway works will be required to accommodate traffic associated with the Proposed Development e.g. to Beresford Avenue and the North Circular along with works to upgrade utilities infrastructure as required.

6.5 An indicative masterplan is shown at Figure 18.
7.0 THE IMPACT OF THE PROPOSED DEVELOPMENT

7.1 Historic England provides practical advice regarding the assessment of development proposals within the setting of heritage assets. Its Good Practice Advice Note 3, published March 2015, provides a five step process to assess the impact of development within the setting of heritage assets. These are outlined below:

Step 1: identify which heritage assets and their settings are affected;

Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset (s);

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;

Step 4: explore the way to maximise enhancement and avoid or minimise harm; and

Step 5: make and document the decision and monitor outcomes.

7.2 This Built Heritage Assessment has identified a number of built heritage assets located within a 1 km radius and 5km radius from the boundary of the Site that have the potential to be affected by the proposed development. This section comprises step 3 of the Historic England advice, through an assessment of impact upon built heritage assets and, if needed, explore the ways that harm could be minimised.

7.3 This study has found that the local area was substantially characterised by comprehensive low-rise industrial and residential development stimulated by the opening of the North Circular Road in 1933. This relatively comprehensive character started to be eroded in the 1960s with some localised redevelopment and a small number of 10- to 20-storey buildings. Locally the area was subject to substantial change with the widening and realignment of the North Circular Road in 1993.

Heritage Assets within the site

7.4 There are no nationally or locally designated built heritage assets on the site itself, most of which has been recently cleared of standing buildings.
Potential Impacts on Heritage Assets within the immediate proximity of the Site

7.5 To the immediate east of the site, it is nevertheless adjacent to a small number of nationally designated and locally designated heritage assets, including the locally-listed early-post-war Ace Café, the Grade II Brent Viaduct (c.1837, by Robert Stephenson) and a pillbox recorded on the Greater London HER. These, together with the undesignated Heather Park House and former Rizla House (now Trading Post) form part of a small area of surviving ‘North Circular’ landscape at the junction of the old course of the North Circular road and Beresford Avenue. Given its present appearance, the site does nothing to enhance the wider setting or heritage significance of any of these assets, all of which are dominated to a greater or lesser extent by the post-1993 North Circular Road and by the 1960s, the 21-storey Wembley Point, which lies 430-metres east of the site (Plate 5.2).

7.5 As regards neighbouring heritage assets, the site is also bounded on its western side by the Grand Union Canal (Paddington Branch), opened 1801. Unusually, whilst the canal is designated as a conservation area in neighbouring Ealing (and indeed in most other London Boroughs through which it passes), that part in Brent, including the part that bounds the site, remains undesignated. It is nevertheless a heritage asset, as does the River Brent (or Twyford) Aqueduct that abuts the site (Plate 5.19). The proposed development has the potential to enhance the setting of both the (undesignated) aqueduct and the (undesignated) canal itself (Plates 4.5 and 4.19).

Potential Impacts on other Heritage Assets within 1km of the Site

7.6 The only other heritage assets within a 1km radius of the site are a locally-listed canal cottage 530m S. of the site (Plate5.16) and a cluster of Grade II Listed buildings 310m to 700m S.W. of the Site on the site of the historic Twyford Manor, viz the early 19th-century Gothick Twyford Abbey, its walled Kitchen Garden Walls and the Church of St Mary, Brentmead Gardens, the latter comprising a 1958 church whose chancel is an 18th and early 19th-century single-cell chapel formerly associated with Twyford Abbey and the previous manor house (Plates 5.5 – 5.11). Apart from a fragmentary park surrounding the house (Plate5.6 and 5.10), all of these assets are largely subsumed by 1930s and modern suburban development and abutted on the north side by the North Circular Road (Plates 5.8 and 5.9). Twyford Abbey and its park are derelict and the Listed house and garden walls are inscribed on the Heritage at Risk Register. They are currently subject to a scheme to revive them as a new secondary school, including two large new buildings within the grounds (Plate 5.11). Because of its
height, the taller parts of the proposed development may be visible in some local views of these assets (e.g. Plate 5.8), but because of the existing setting, ongoing development proposals and existing large buildings nearby, no significant adverse effects on the heritage significance of any of these assets are predicted.

Potential Impacts on Heritage Assets within up to 5km from the Site

7.7 Because of its height, the proposed development has the potential to be visible over a wide area. Because of the low-lying topography of the site and the valley of the River Brent and because of the extensively built-up nature of the area, much of the wider 5-km radius search area is devoid of long-distance views, with even the 21-storey Wembley Point tower-block 430m east of the site being largely invisible except generally in the most local of views (e.g. Plate 5.2). The Brent valley is surrounded by higher vantage points, notably Hampstead Heath and Golders Hill (up to 7km north-east), Harrow on the Hill (4.5km north-west), Hangar Hill (1.5km south-west) and Horsenden Hill, Greenford (2.5km west). Many of these have heritage assets, some of high importance (Appendix 1).

Historically development within the Brent Valley and on its flanks has been relatively low-rise (Plate 3.3). There are nevertheless a number of tall developments in the vicinity of the site, some dating from the 1960s / 70s, but generally of much more recent origin (Appendix 1). Thus outward views from these higher places are already affected not only by extensive low-rise 20th-century development, including the Park Royal Industrial Estate, but also by the arch of Wembley Stadium and by modern high-rise development such as that of up to 17 storeys around it on Wembley Hill (1.5km north of the site), blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (650m – 950m west of the site), a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station, a cluster of 8-storey blocks of flats and commercial buildings on the regenerated Guinness site on the lower flanks of Hangar Hill (650m south-west of the site), the 10-storey Travel Lodge and Crown House blocks just west of the site and by the 21-storey Wembley Point, the latter some 430m east of the site (Plates 5.22 – 5.28).

7.8 Whilst the proposed development will be distantly visible from these high natural vantage points and from some of the heritage assets upon them, no significant effects are predicted, because of existing visual impacts in the view, both low-rise and high-rise. Further, no obvious built heritage assets with which the proposed development might compete for dominance (e.g. church spires or steeples) were visually prominent (or in most cases even visible) between these high vantage
points and the site.

7.9 Thus, despite the height of the proposed development, its low-lying nature and the height of surrounding vantage points, it would currently appear that the proposed development is unlikely to result in significant effects on built heritage.
8.0 **CONCLUSIONS**

8.1 This report has been prepared by CgMs (part of the RPS Group) on behalf of St George Developments Limited. It considers the proposed development of a 9.15 Hectare (ha) site within the administrative boundary of the London Borough of Brent.

8.2 The proposals site comprises a triangle of industrial land, bounded to the south-east by the North Circular Road, to the south-west by the Grand Union Canal (Paddington Branch) and to the north by Beresford Avenue. The site is further bisected by the River Brent. The area is overwhelmingly industrial in character, except for a triangle of land between the north side of Beresford Avenue and the West Coast Main Line, which is characterised by streets of late 1930s housing arranged in short terraces.

8.3 The site is included within The Alperton Masterplan, adopted as a Supplementary Planning Document to the Brent Council’s Local Development Framework (LDF) Core Strategy on 18 July 2011.

8.4 The site, currently utilised as an industrial estate within B1/B2 and B8 use classes, is currently designated as a Strategic Industrial Location by the GLA in the London Plan. The majority of the site is vacant but historically has been characterised by large low rise industrial buildings built from 1938 onwards. Occupiers on site include, but are not limited to, car workshops/car dealers, plant storage, metal fabrication and scaffold companies.

8.5 The Proposed Development will comprise 12 buildings (referred to as Buildings A, B, C, D, E, F, G, H, J, K, L and N) ranging in height from 5 storeys to 25 storeys. The buildings will be set within publicly accessible open landscaped areas, including public squares and gardens. Courtyard gardens and balconies will provide private and semi-private amenity space for residents.

8.6 The Proposed Development will provide up to 2,750 homes (a proportion of which will be affordable homes) and a proportion of commercial/employment floorspace (including A1-A5, B, D1 and D2 uses). Under croft car parking will serve residents of each building and it is anticipated that an energy centre will be provided as part of the proposals.

8.7 Phase 1 of the Proposed Development will be submitted in detail and will comprise the provision of circa 375 homes, a proportion of commercial/employment floorspace and a community centre. The remainder of the Proposed Development will be subject to an outline planning consent.
8.8 Highway works will be required to accommodate traffic associated with the Proposed Development e.g. to Beresford Avenue and the North Circular along with works to upgrade utilities infrastructure as required.

8.9 Paragraph 128 of the National Planning Policy Framework (NPPF) requires applicants to describe the significance of any heritage assets which may be affected by a proposed development, including any contribution made by their setting. Historic England defines setting to be ‘the surroundings in which a heritage asset is experienced’. In accordance with its guidance, this report seeks to determine the significance of nearby built heritage assets, the extent to which the proposed changes within the Site would affect that significance.

8.10 Relevant designated and non-designated built heritage assets within the Site and within a 5km radius are considered. All listed buildings and locally-designated built heritage assets within 1km of the site are considered. In addition, because of the height of the tallest elements of the proposed development, Registered Parks (all grades) and Grade I and II* Listed buildings are considered, up to a radius of 5km.

8.11 This study has found that the local area was substantially characterised by comprehensive low-rise industrial and residential development stimulated by the opening of the North Circular Road in 1933. This relatively comprehensive character started to be eroded in the 1960s with some localised redevelopment and a small number of 10- to 21-storey buildings. Locally the area was subject to substantial change with the widening and realignment of the North Circular Road in 1993.

8.12 This study has found that there are no nationally or locally designated built heritage assets on the site itself, most of which has been recently cleared of standing buildings. As regards neighbouring heritage assets, the site is also bounded on its western side by the Grand Union Canal (Paddington Branch), opened 1801. Unusually, whilst the canal is designated as a conservation area in neighbouring Ealing (and indeed in most other London Boroughs through which it passes), that part in Brent, including the part that bounds the site, remains undesignated. It is nevertheless a heritage asset, as is the River Brent (or Twyford) Aqueduct (also of 1801) that abuts the site. The proposed development has the potential to enhance the setting of both the (undesignated) aqueduct and the (undesignated) canal itself.

8.13 There are a small cluster of nationally designated and locally designated heritage assets adjacent to the eastern end of the site, including the locally-listed early-post-war Ace Café, the Grade II Brent Viaduct (c.1837, by Robert Stephenson) and a pillbox recorded on the Greater London HER. Whilst the original pastoral
setting of the River Brent viaduct has disappeared without trace, the Grade II viaduct and non-designated pillbox, together with the locally-listed Ace Café and undesignated Heather Park House and former Rizla House (now Trading Post), form part of a small area of surviving ‘North Circular’ landscape at the junction of the old course of the North Circular road and Beresford Avenue. Given the present appearance of both the site and the immediate surroundings of these designated and non-designated assets and the existing dominance of the post-1993 North Circular Road and the 1960s, 21-storey Wembley Point, which lies 430-metres east of the site, it appears most unlikely that the proposed development would result in any significant additional adverse effects.

8.14 The only other heritage assets within a 1km radius of the site are a locally-listed canal cottage 530m S. of the site and a cluster of Grade II Listed buildings 310m to 700m S.W. of the site on the site of the historic Twyford Manor, viz the early 19th-century Gothick Twyford Abbey, its walled Kitchen Garden Walls and the Church of St Mary, Brentmead Gardens, the latter comprising a 1958 church whose chancel is an 18th and early 19th-century single-cell chapel formerly associated with Twyford Abbey and the previous manor house. The fragmentary park surrounding Twyford Abbey and its walled garden is largely subsumed by 1930s and modern suburban development on three sides and abutted on the north side by the North Circular Road. Twyford Abbey and its park are derelict and the Listed house and garden walls are inscribed on the Heritage at Risk Register. They are currently subject to a scheme to revive them as a new secondary school, including two large new buildings within the grounds. Because of its height, the taller parts of the proposed development may be visible in some local views of these assets, but because of the existing immediate setting, existing nearby large buildings and ongoing development proposals within the surviving parkland, it again appears most unlikely that the proposed development would result in any significant additional adverse effects.

8.15 Whilst no significant adverse effects are predicted on or near the site, because of the existing appearance of the site and its surroundings and because of the low and medium importance of the locally designated and Grade II assets nearby, the proposed development has the potential to be visible over a wide area, potentially affecting the settings of more distant assets of medium and high importance. Because of the low-lying topography of the site and the valley of the River Brent and because of the extensively built-up nature of the area, much of the wider 5-km radius search area is devoid of long-distance views towards the site, with even the 21-storey Wembley Point tower-block 430m east of the site often being largely invisible beyond its immediate locality. No significant adverse effects are predicted on lower-lying heritage assets between 1km and 5km from
8.16 The Brent valley is nevertheless surrounded by higher vantage points, notably Hampstead Heath and Golders Hill (up to 7km north-east), Harrow on the Hill (4.5km north-west), Hangar Hill (1.5km south-west) and Horsenden Hill, Greenford (2.5km west). Many of these have heritage assets, some of high importance, notably the Horsenden Hill Iron Age Scheduled Monument and the historic village and school at Harrow on the Hill. Historically development within the Brent Valley and on its flanks has been relatively low-rise. There are nevertheless a number of tall developments in the area, some dating from the 1960s / 70s, but generally of much more recent origin. Thus outward views from these higher places are already affected not only by extensive low-rise 20th-century development, including the Park Royal Industrial Estate, but also by, for example, the arch of Wembley Stadium and modern high-rise development such as that of up to 17 storeys around the Stadium on Wembley Hill (1.5km north of the site), blocks of flats between 14 and 17 storeys high at the western end of the Alperton Masterplan SPD area (650m – 950m west of the site), a high-rise development cluster of up to 20 storeys (Holiday Inn, Imperial College London, Lyra Court etc) at North Acton Station, a cluster of 8-storey blocks of flats and commercial buildings on the regenerated Guinness site on the lower flanks of Hangar Hill (650m south-west of the site), the 10-storey Travel Lodge and Crown House blocks just west of the site and by the 21-storey Wembley Point, the latter some 430m east of the site.

8.17 Whilst the proposed development will be distantly visible from these high natural vantage points and from some of the heritage assets upon them, no significant adverse effects are predicted, because of distance and because of existing visual impacts in the view, both low-rise and high-rise. Further, no obvious built heritage assets with which the proposed development might compete for dominance (e.g. church spires or steeples) were visually prominent (or generally even visible) between these high vantage points and the site.

8.18 Thus, despite the height of the proposed development, its low-lying nature and the height of surrounding vantage points, it would currently appear that the proposed development is unlikely to result any significant adverse effects on any built heritage assets.
SOURCES

CgMs, June 2017(a). Archaeological Desk-Based Assessment - Grand Union Place, Alperton, London Borough of Brent

CgMs, June 2017 (b). Archaeological Desk-Based Assessment - Grand Union Place, Alperton, London Borough of Brent (Southern Site)


Department for Communities and Local Government, 2014. National Planning Practice Guidance (NPPG)

English Heritage, 2011. Seeing the History in the View


