



Planning Committee

12 July 2011

Report from the Director of Regeneration and Major Projects

For Action

Wards affected:
Alperton, Wembley Central and
Stonebridge

Alperton Masterplan – Supplementary Planning Document

1. Summary

- 1.1. Alperton has been identified as a growth area within the Local Development Framework (LDF) Core Strategy providing 1600 new homes and creating new employment opportunities, exploiting the canal to front development and providing the necessary physical and social infrastructure to support the new and existing communities.
- 1.2. This report sets out the consultation process carried out and the representations made on the draft Alperton Masterplan Supplementary Planning Document (“the draft SPD”). The report also sets out the proposed officer responses to the consultation representations and proposed changes to the draft SPD as a consequence.
- 1.3. The Executive is asked to agree to these changes to the draft masterplan SPD and thereafter formally adopt the Alperton Masterplan SPD to the Councils LDF Core Strategy.
- 1.4. The draft SPD can be found in appendix 1.

2. Recommendations

That Planning Committee

- 2.1. Support the proposed responses to the consultation representations and amendments to the draft masterplan SPD as outlined in section 4.0 and detailed in appendix 3 of this report; and

- 2.2. Recommend that the council's Executive adopt the Alperton Masterplan as a Supplementary Planning Document to the Councils Local Development Framework (LDF) Core Strategy.

3. Background

- 3.1. Alperton's assets mean that it is an excellent location for new housing, new local employment and new amenities. The growth area is promoted in the Core Strategy for mixed use regeneration along the Grand Union Canal including at least 1600 new homes in the period to 2026, supported by infrastructure identified within the Infrastructure Investment Framework. The Core Strategy was approved for submission to the Secretary of State on 6th April 2009, and was subsequently agreed at Full Council.

- 3.1.1. In December 2009 the council's Executive approved a vision for Alperton, which was illustrated and published in a prospectus document used to describe the vision to stakeholders and statutory partners. The vision for Alperton was generated through consultation with residents, local businesses, Council Officers, landowners and Statutory Partners.

- 3.2. The draft SPD was then developed by the project team during 2010, using the vision document as a foundation for the proposals. The draft SPD provides detailed planning guidance specific to this growth area. The document establishes principles for development including uses, physical and social infrastructure, and relationship of the development with the canal, phasing and delivery.

- 3.2.1. Support for the document to proceed to public consultation was given at CMT in September 2010. Approval to carry out public consultation on the SPD was given by Planning Committee in October 2010. The draft SPD was formerly consulted on in January and February 2011.

3.3. Detail

- 3.3.1. The Alperton "growth area" is a strip of brownfield land along the Grand Union Canal from Middlesex House in the west to the border with the Northfield Industrial Estate in the east, encompassing some of the poorest quality industrial land in the borough. The abiding impression of people visiting the industrial areas is not just its poor quality but the potential of the canal in creating a new waterside residential neighbourhood.

- 3.3.2. The council owns very little of the land identified and so cannot physically deliver the change on its own. This draft SPD is a planning document developed to inform and influence developers in the types of development the council would consider appropriate in Alperton.

- 3.3.3. The draft SPD is intended to be a clear and accessible document which both interests and excites developers and potential investors and is a useful tool to enable council officers to assess development proposals to ensure that they complement and support the vision for the area.
- 3.3.4. The draft SPD describes three distinctive new neighbourhoods/character areas linked by a high quality and lively stretch of canal.
- 3.3.5. “Alperton’s core: a cultural centre” will be a lively centre for cultural activities, community facilities and local shopping. Development will be mixed use with a supply of modern business space for economic growth.
- 3.3.6. The “Waterside residential neighbourhood” will predominantly be a place to live for families within a compact environment defined by a network of connected streets and public spaces. Access to the canal for existing and new residents will be introduced on the off-side.
- 3.3.7. The “Industrial transition zone: a new working suburbia” will provide modern business space for large and small operations. A new bridge link across the River Brent will connect the estate with the fabric of Park Royal.
- 3.3.8. The success of the transformation will depend on the delivery of improved streets and connections, supporting social and physical infrastructure including new public realm and open space interventions. A sustainable approach to transport is made which proposes fewer cars and improved connections to public transport; energy efficient design and the employment of renewable energy are encouraged.
- 3.3.9. Each character area is described in terms of its overall feel and character, land use, building height, street hierarchy, public realm and open space improvements and housing density, types and tenure. Viability appraisals have been undertaken to test that the housing types and density suggested are feasible and deliverable considering current and emerging market conditions.

4. Consultation

- 4.1. Approval to carry out public consultation on the draft SPD was given by Planning Committee in October 2010. Below is a summary of the consultation which took place, refer to appendix 2 for the consultation report.
 - 4.1.1. The consultation commenced on the 5th January 2011 and closed on 25th February 2011, a total period of seven weeks. The public consultation was carried out in line with the Council’s statutory obligations set out in the Planning and Compulsory Purchase Act 2004. This act seeks to ensure

greater public participation and transparency in the planning process. The Council has followed the general consultation process for a SPD as set out in the Statement for Community Involvement (SCI) and has actually gone over and above these minimum requirements in order to ensure that the content of the SPD genuinely reflects the wants and needs of the local community.

- 4.1.2. In addition to a notice in the local press a letter was sent to approximately 2500 residents and local businesses in Alperton to inform them of the consultation taking place, posters advertising the consultation were on display around Alperton and e-mails were sent to all known stakeholders including Statutory Consultees, ward councillors, landowners of properties within the masterplan area and anyone who expressed an interest in the first round of consultation which took place in 2009.
- 4.1.3. A summary of the draft SPD was prepared to inform the consultation process as the draft SPD itself was considered to be too long to be genuinely accessible to members of the local community, this summary was published with the draft SPD on the Council's website and on the Planning Portal, and hard copies of the document were made available at One Stop Shops, local libraries and St James Church on Stanley Avenue.
- 4.1.4. The Council organised five exhibitions displaying the summary of the draft SPD as well as hard copies of the whole document. The exhibitions took place at a range of venues across Alperton at different times of day and days during the week. This was to ensure that the exhibition was accessible to a wide cross section of the community and so that as many people as possible could attend, one of the exhibitions was at the Shri Sanathan Hindu Mandir with an interpreter present. In total 127 people attended these events.
- 4.1.5. Several one to one meetings were held with interested parties including local businesses, developer/ landowners and the headmistress at Alperton Community School. A presentation was made to the Heather Park Neighbourhood Watch group and since January 2011 a second presentation has been made updating this group on the progress of the project.
- 4.1.6. A questionnaire was prepared, based on the summary of the draft SPD, which asked for feedback on whether the aims and ambitions of the draft SPD were supported as well as providing an opportunity for consultees to choose which projects within the community were the most important. This questionnaire was available to be filled in online using the Planning Portal as well as being made available as hard copies at the exhibitions. A total of four people completed the online questionnaire and a further 33 completed hard copies.

4.1.7. All comments and suggestions received in letters, e-mails and the questionnaires, a total of 63 pieces of source material have been tabulated and sorted into different topic headings, circa 280 individual comments were recorded (refer to appendix 3). Of the completed questionnaires, letters and e-mails received the majority of representations have been supportive of the proposals but many have provided suggestions for where the document could be improved or have raised particular issues. Out of a total of 63 representations only three were entirely unsupportive of the proposal. Whilst the sample size was too small to carry out any statistical analysis some key issues have been identified.

4.2. Questionnaire

4.2.1. The purpose of the questionnaire was to allow members of the community to comment on whether they agreed with the objectives of the draft SPD and to give them an opportunity to choose which of the potential projects which development could contribute towards were most important.

4.2.2. The number of questionnaires received was too small to be able to be used for statistical analysis, in addition to this, respondents tended to just fill out the sections which were relevant to them. In summary, between 33 and 57% of respondents agreed with the objectives of the draft SPD and between 3 and 11% of respondents did not agree.

4.2.3. Where respondents were asked to choose which projects they thought were most important in the first character area, Alperton's Core, 25% of respondents selected improvements to Alperton Community School, 16% selected to improve the public space outside Alperton Station. In the central character area 25% of respondents chose creating more open and green spaces along the canal and 21% of respondents chose a new road linking Woodside End and Mount Pleasant. In the Industrial Transition Zone 30% of respondents chose creating a new connection to the North Circular Road (which would reduce freight traffic on Beresford Road).

4.3. Social and Physical Infrastructure

4.3.1. Almost half of the representations received have said that it is important to provide sufficient additional social and physical infrastructure to support the existing growth including GPs, dentists, school places, nursery places and community facilities. Response: The council recognises that in order for the transformation of Alperton to be a success new developments must have regard for the needs of the new and existing communities and the need for infrastructure, both social and physical, to be delivered alongside the new homes. This aim to create a successful place is embedded within the Core Strategy (CP5), the changing needs of the community as the

population increases has been calculated and is set out in the Brent IIF. This approach is set out in Section 4.0 – Achieving the vision and more detail on the proposed location of the social infrastructure so that it is set out in Section 7.3 – Destinations and places, in response to these comments these two sections have been amended to make this intention clearer.

4.3.2. Representations received have also raised concern about the lack of open space for recreations and particularly for young people. Response: Section 7.3 describes the councils approach to meeting open space requirements in Alperton, which includes improving existing open space and proposing locations of new open spaces which can be delivered through development. It has been noted however that this section should provide more detail on how open spaces can be improved with a clear reference back to CP8 –Protection and enhancement of Open Space, Sports and Biodiversity and the requirements of the IIF.

4.3.3. Several comments have also been received about lack of support for the elderly and vulnerable members of the community and the need for more elderly care homes. Response: Supported housing need in the borough accommodates a wide range of client groups, which include the some of the most vulnerable people in the borough, including frail elderly people and individuals and households with multiple, complex needs. The provision of new care and support accommodation, as well as the remodelling of existing facilities, to enable people to live more independently is a strategic priority for the borough (CP21). The extent, number and location of such housing should come out of a borough wide assessment of needs and analysis of available resources and this will inform the next version of the IIF for the Borough. No changes to the draft SPD are proposed.

4.4. **Housing**

4.4.1. Some residents have raised concerns about the planned growth in the area, stating issues of overcrowding and congestion. Response: The decision to support growth in Alperton was already set out in the Core Strategy as one of the Boroughs Growth Areas. The Core Strategy (CP2) sets out the borough's plan for a sustainable population growth of 28,000 people by 2017 and the provision of at least 22,000 additional homes between 2007 and 2026. Over 85% of these new homes will be delivered in five growth areas, one of which is Alperton, where mixed use regeneration is identified as having the capacity to delivery a minimum of 1,600 new homes. The draft SPD has tested the acceptability of this target, which is informed by the LDF Site Specific Allocations. Indicative capacities and phasing for development sites across the borough are set out calculated on the basis of site area, accessibility to public transport,

extant planning permissions and detailed pre-planning application discussion with developers. No changes are proposed to the draft SPD.

4.4.2. Several comments have been recorded about the massing and density of the new homes within the draft SPD and the low rise approach in the central character area– “Waterside Residential Neighbourhood”. Typically comments from the existing community have expressed support for the ambition to restrict the height of new development so that it is in keeping with the existing massing and landowners and developers have expressed concerns that the proposed low rise development is too restrictive stating that the draft SPD should be more flexible. Response: The Council has carried out a significant amount of testing of the layouts that are illustrated in the draft SPD. Proposals within the central character area aims to show how the compact and tight-knit character described in the vision can be achieved whilst being sympathetic with the surrounding building heights and maintaining the spirit of existing planning requirements. The draft SPD is intended to be clear about the scale of development that the Council and Local community expect whilst at the same time being flexible in as much as it states that the proposals provide one interpretation of how development can come forward in Alperton to achieve the character that is set out in the vision and where design is of the highest or exemplary standard, higher densities will be considered. In response to these comments Section 4.0 and Section 9.0 - Waterside residential neighbourhood has been updated to reflect some of the comments received from developer/ landowners and it has been made clear that maps and diagrams are for illustrative purposes only and that future applications will not be held up against them to get an exact match.

4.4.3. Local residents have expressed concerns about building more high rise buildings in Alperton. Response: The guidance actually restricts taller, higher density housing to one area at the junction of Ealing Road and the canal near to Alperton Station. This area is considered suitable for higher density housing as it has good public transport links and is well served by a range of local services and amenities. Further, this area is characterised by taller buildings, such as Middlesex House, the recently completed development on Atlip Road, and the permitted proposal for the B&Q site, and therefore this form of development is considered to be in keeping with the existing built environment. No changes to the draft SPD are proposed.

4.5. **Transport**

4.5.1. Existing residents are concerned about the number of new cars which will be introduced to Alperton as a result of the new development and are concerned about increased congestion and in particular increased strain on parking in the area. Response: The proposals in the SPD have been designed so that, using the average parking ratios set out in Section 7.4 - Reducing car use, all new cars introduced to the area can be accommodated within the growth area boundary using a combination of on

and off street parking. Car clubs and car sharing will also be encouraged in new development to reduce car use. If new development has an affect on parking availability on existing streets then the introduction of controlled parking should be considered if it is in the interest of existing residents. Some residents have suggested that a multi storey car park should be built or developments should consider underground car parking, neither of these solutions have been proposed in the draft SPD as they are considered to be unviable and contrary to sustainable development and the design principles of the draft SPD. Section 7.4 has been updated to reinforce this approach.

4.5.2. Concerns have been recorded about the impact of additional cars on road safety, specifically on Beresford Avenue and Mount Pleasant which is already considered to be dangerous. Response: The Council has referred concerns raised about existing safety on Beresford Avenue to the Highways Department who are investigating this item. Opportunities for road and junction improvements and traffic calming if necessary will be investigated as part of the transport assessment for each individual development site. Section 7.2 - New routes and roads has been updated to reinforce this approach.

4.5.3. Support for better public transport has been noted, in particular more bus routes and increased frequency of existing routes. Residents have advised that they would like a bus routes to link Beresford Avenue to Stonebridge Park Station. Response: As a council we have an aspiration to secure a new bus route through the borough which will go through Alperton, linking Sainsbury's in the west with Beresford Avenue and Stonebridge Park Station. The council will continue to work closely with Transport for London to negotiate improved frequency of the 224 bus route and the potentially new bus route as the new homes are delivered and demand increases. Section 7.4 has been updated with more information on the proposed new bus route.

4.6. **Northfields Industrial Estate**

4.6.1. Comments have been received that support the alternative option to develop part of Northfields Industrial Estate for residential use but the representation from the GLA has been very clear that they cannot support this option as the Northfields Industrial Estate remains protected by the Mayor of London as a Strategic Industrial Location (SIL). Response: The Council believes that the site presents a major opportunity not only to provide additional homes but also contribute to the delivery of the essential social and physical infrastructure that Alperton needs including potentially a new open space and is disappointed that the GLA are not flexible enough to consider some enabling development to see this site come forward. Due to the specific concerns raised by the GLA however the council accepts reluctantly that any review of the site allocation will

need to be completed through a Development Plan Document and so has withdrawn any reference to any alternative development option for this area. Section 10.3 – Opportunity to introduce residential development along the canal has been withdrawn.

4.7. **The Environment, Biodiversity and Waterside Regeneration**

- 4.7.1. Comments have been received from Natural England, British Waterways, Environment Agency and the community that there should be more detail on how green and open spaces including the canal and Brent River will be protected and enhanced, also more emphasis on sustainable development and the effects of climate change has been requested. Response: Section 7.5 – Environmental Sustainability has been updated to include more guidance on sustainable development including relevant biodiversity and canal-side protection and enhancement measures which will be sought from development proposals and an additional section 7.6 has been added on renewable energy and climate change adaptation.
- 4.7.2. Support for new on line and off line moorings has been recorded alongside concerns from developers and landowners about the costs involved in delivering these. Response: The draft SPD promotes the installation of a range of types of additional mooring points along the canal in appropriate locations and these have been proved to be deliverable by developments on the ground. To introduce canalside character alongside new developments, the masterplan does also suggest that it may be possible to introduce inlets at appropriate locations, which may be full depth or shallow constructions. The deliverability of specific proposals (technical and financial) would need to be properly investigated through the planning process.
- 4.7.3. Comments have been received about the need to improve the maintenance of the canal alongside concerns from developers about how this will be funded. Response: Although British Waterways will be principally responsible for the maintenance and upkeep of the tow path, new development in this area is likely to significantly increase the numbers of those using such spaces. The council will work together with developer partners and statutory undertakers in order to ensure that the canal is a successful public space and reasonable contributions to public realm improvements will be sought and negotiated upon as development comes forward. No change to the draft SPD is proposed.

4.8. **Public realm, management and maintenance**

- 4.8.1. Support for improvements to the public realm have been recorded alongside concerns that the public realm is not maintained adequately. Response: Public realm improvements are a central part of the proposals for Alperton, in order to create a legible and identifiable place which is

pleasant and safe to walk around. The draft SPD is to be read in conjunction with The Brent Placemaking Guide which sets out public realm policy and design guidelines. Contributions to the management and maintenance of open spaces will be required as part of any development proposal. Section 7.2 has been updated to reinforce the requirement to refer back to the Placemaking Guide and Section 11.1 – Working with Partners has been update to show a commitment to working with partners and the community to improve public realm design and management and maintenance.

4.9. **Anti Social Behaviour (ASB)**

- 4.9.1. Concerns about ASB including dog fouling, littering, vandalism and aggressive behaviour were recorded. Response: While the draft SPD cannot deal with every individual or particular problems related to ASB, it does provide support to ensure that in planning dwellings and neighbourhoods attention is given to planning out crime by adopting important design principles such as ensuring overlooking of spaces, providing good lines of sight and so-on. An amendment is proposed in section 4.0 to underline this important issue. It is recognised that the council will need to work closely with other teams including SNT, parks and streetcare as the area is developed to tackle such issues and section 11.1 has been updated to show this.

4.10. **Conservation**

- 4.10.1. Comments have been received that there should be more consideration for the historic environment. Response: The council will expect the usual detailed analysis of the impact of development on adjacent registered heritage assets, as part of any definite development proposal. The impact on views in and out of the Conservation Area will require testing and Brent Council will require the test as a part of any Design and Access statement.

4.11. **Viability**

- 4.11.1. Concerns have been recorded that the proposals are unrealistic and undeliverable. Response: The draft SPD sets out a broad interpretation of the vision for Alperton, including building massing that is able to deliver approximately 1600 homes, as identified within the Core Strategy. On the basis of estimations of land values, construction costs and sales values, the council is comfortable that the proposals are deliverable across medium to long term development cycles. The viability of specific proposals will be tested through the planning process having consideration for the need to deliver mixed and sustainable development, including infrastructure to support development and affordable housing. No changes are proposed.

- 4.11.2. Concerns about the accuracy of the viability study have been recorded and the affordable housing targets have been recorded. Response: On the basis of availability of information, the council has a broad understanding of costs and values in the masterplan area and these are not perceived to be prohibitive. The 2009 Affordable Housing Viability Study concludes that although circumstances vary from site to site, it is appropriate for the council to maintain the 50% borough wide target and this is included within the Adopted LDF Core Strategy (2011). Development proposals that come forward will be tested for viability through the planning process having regard for a number of factors, including the deliver of affordable housing. In any case, it is not possible for the draft SPD to introduce a policy that differs from the Core Strategy.
- 4.11.3. The requirement to work closely with the community during delivery stage has been recorded. Response: Section 11.1 has been update to show a commitment to working with partners and the community during delivery stage.

5. Financial Implications

- 5.1. The council's property interests in the area are very limited, its role in delivery is to facilitate development and help to prioritise the physical and social infrastructure needed to support new homes and adapt to changing economic circumstances. There is no proposal from the council to inject any kick start capital investment into the area.
- 5.2. **Revenue Expenditure:** The draft SPD is essentially a development promotional tool giving clear guidance and certainty to developers. It will be for land owners and developers to come forward on private land and bring forward proposals. The revenue costs to the council of any further planning work hereafter will be limited. It will be mostly limited to a role of encouragement and assistance through established Planning and Regeneration and Major Projects (R&MP) Teams. A relatively small sum has been identified using New Homes Bonus funds to look at stalled development sites in the area. There is a clear business case for this work as it should be remembered that early delivery of new homes has significant benefits to the council in receiving New Homes Bonus.
- 5.3. **Infrastructure Expenditure:** The overall infrastructure needs of building 1600 new homes in this area was set out in the council's IIF. This was completed in 2008 and officers are now updating this IIF to support the proposed introduction of the Community Infrastructure Levy (CIL). In 2008, the 1600 new homes to be provided over the next 15-20 years were calculated to require £24.4m of infrastructure (transport, education, health,

open space, children's plan, community facilities and the like). Only £10.4m of this was identified at the time leaving a circa £14m shortfall. The scale of shortfall is by no means unusual and is normally remedied by reducing the quality or quantity of infrastructure or by utilising other funding schemes that are not known at the time. So for example, the New Homes Bonus, which was not available in 2008, could deliver at least £12m if it continued through the whole period. It is also proposed that CIL would collect more than the current S106 planning obligations. The costs of infrastructure development would therefore be largely neutral. Even if they were not, the council's judgement within the Core Strategy is that growth provides housing stock renewal, jobs and other improvements to the borough that will be worth any notional infrastructure cost.

- 5.4. **School provision:** The 2008 IIF only included the costs of providing for the 'extra new' population that would be generated by the new homes. This amounted to an extra form of entry at secondary school level and two forms of entry at primary school level, based on expanding existing schools (so no land acquisition costs were included). At the time the redevelopment of Alperton Community School was promoted as a Building Schools for the Future (BSF) Project and full replacement funding was assumed. Currently there is likely to be enough capital resource generated through either S106 or CIL to cover the cost of school expansion in the area if it takes place on existing school sites. The complete redevelopment of Alperton Community School is largely outside of the growth agenda because it was to remedy existing deficiencies in the school buildings and layout. Nevertheless the R&MP team will review the possible development options by the Autumn/Winter of this year for report to Executive.
- 5.5. The Council expects that the published document will improve pre-application understanding and negotiations with developers and contribute to improved application processing times. The adopted draft SPD will, in parallel with the infrastructure study, clarify the Council's expectations upon developers for their contribution to roads, schools, open space, health and community facilities etc.
- 5.6. The original planning and consultation work was met from R&MP and planning service budget and any future costs, for example publishing the document, will be met from R&MP budgets funded from the New Homes Bonus.

6. Legal Implications

- 6.1. The Planning and Compulsory Purchase Act 2004 has changed the statutory basis for drawing up development plans in England and Wales. Unitary Development Plans and Supplementary Planning Guidance will be replaced by a Local Development Framework (LDF). Supplementary Planning Documents (SPD) are intended to provide greater detail and clarify the Council's planning policies however, they cannot introduce new policies.
- 6.2. New Planning Policy Statement 12 "Local Spatial Planning" (PPS12) sets out the procedural policy and process of preparing Local Development Documents, including SPD. SPD's are produced as part of the council's Local Development Framework and replace Supplementary Planning Guidance (SPG). The SPD's expand on the council's adopted policies to provide more detailed information than can be contained in the policies themselves. The draft SPD cannot introduce new policy and is consistent with the Core Strategy.
- 6.3. Any of the Council-led infrastructure proposals will have to go through the appropriate Council procedures e.g. obtaining approvals from the Planning Committee and the Executive if required.

7. Diversity Implications

- 7.1. The Statement of Community Involvement identifies how the public are to be engaged in the preparation of draft SPD in general. An inclusive approach to the consultation was taken.
- 7.2. The draft SPD sets out the development framework in one of the most diverse communities in London. The regeneration of the area is set to embrace and celebrate this diversity through the securing of a range of facilities for the community to meet the needs of its diverse ethnic, cultural and religious groups. It also tries to create a broad base of employment opportunities for different sectors and supports skills and other training and job placements. The draft SPD also tries to create an environment such as new public parks and spaces which will be accessible to all.
- 7.3. The Council has carried out an impact needs/requirement assessment on the draft SPD, and this is available as a background document.

8. Staffing/Accommodation Implications (if appropriate)

- 8.1. There are no additional staffing requirements arising as a result of the recommendations of this report.

9. Environmental Implications

- 9.1. The Planning Act 2008 allows Local Planning Authorities to prepare SPD without undertaking SA/SEA, as long as they screen for the need for a Sustainability Appraisal (SA) incorporating a Strategic Environmental Assessment (SEA) of the SPD as it is produced. In light of the 2008 Planning Act, the Council is required to carry out a screening to ensure that the legal requirements for SA/SEA are met where there are impacts that have not been covered in the appraisal of the parent DPD.
- 9.2. The draft SPD screening report is available as a background document.

Appendices:

Appendix 1 – Draft Alperton Masterplan SPD
Appendix 2 – Consultation Report
Appendix 3 – Table of consultation comments

Background Papers

Alperton SPD Equalities Impact assessment (INRA)
Alperton SPD – Sustainability Appraisal Statement

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