

22 December 2025

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Dear Sir / Madam

**Representations to the Council's Draft Local Plan Main Modifications Consultation
Harrow & Wealdstone Station Car Park, Ellen Webb Drive**

Thank you for providing us with the opportunity to engage with the consultation on the New Local Plan. I write on behalf of our client, Solum, who has an interest in the above site.

The Harrow & Wealdstone Station Car Park site has been earmarked for re-development by the Council for over 10 years. In discussion with the relevant rail organisations Solum has identified an opportunity to deliver a significant number of new homes on the site whilst retaining station related infrastructure. It is in this context that we provide comments on the Draft Local Plan Main Modifications Consultation Document, with a particular focus on the site allocation (Main Modification Ref. MM72).

Below I provide a brief overview of Solum, the site and its context, and the background to the site, before turning to specific comments on consultation document.

Solum

Established in July 2008, Solum is a joint venture between Network Rail and Kier Property formed to attract private investment into the rail network and build much needed new homes close to railway stations. The joint venture specialises in developing underutilised brownfield sites near to or including train stations which in turn generates funding to enable station related and environmental improvements for the travelling public.

To date, Solum has completed schemes in Epsom, Christchurch, Haywards Heath, Walthamstow, and Twickenham, with further schemes, in various phases of delivery, in Guildford, Bishop's Stortford, and Twickenham Station Yard.

Site and Context

The site is located 200 metres northwest of Harrow & Wealdstone Train Station, accessed off Ellen Webb Drive. The site comprises two parts: 61 at grade station car parking spaces in the southern part of the site (one of two station car parking facilities, being the subservient of the two); and an operational rail compound in the northern part of the site which is used by Network Rail on an ad hoc basis.

The site falls both south to north and east to west as Ellen Webb Drive slopes down as it heads west towards Headstone Drive, which runs under the railway bridge.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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The site does not contain any statutory or locally listed buildings or structures, and is not located within a conservation area or archaeological priority area. The Grade II listed station and platform buildings, 36 High Street and Wealdstone Police Station, and locally listed buildings 21 the Bridge and the Holy Trinity church are all located circa 200 metres from the site. The site lies within the Roxborough Road Footbridge Protected Views Setting Corridor.

The Environment Agency mapping system shows the site to be within Flood Zone 1 (rivers and sea). A section of the site lies within a Critical Drainage Area as it lies within Flood Zone 3 (surface water), despite this there is a limited level of risk as it pertains to the northern extremity only.

The site benefits from a PTAL (Public Transport Accessibility Level) rating of 5 indication 'very good' access to public transport. Harrow & Wealdstone Station (served by the overground and underground) is located approximately 200 metres to the southeast of the site. The nearest bus stops can be found here as well. These are served by bus routes 140, 182, 186, 258, 340, 640, N18 and N140. The site is also connected to a network of pedestrian routes which run along the northern boundary. These transport links allow public travel throughout the wider locality and beyond.

The site benefits from a good range of services and facilities within the wider locality. These include schools, convenience stores, post office, places of worship, a variety of public houses and eateries and public open space.

Within current planning policy documents the site falls within the Harrow & Wealdstone Opportunity Area (OA) and is allocated for re-development within the 2013 Harrow & Wealdstone Area Action Plan (Site 5 – Wealdstone Infills). This allocation covers several other smaller sites to the northeast.

Background

In line with the long term aspirations of the Council for the site to be re-developed Solum has identified an opportunity to deliver a significant number of new homes on the site.

In August 2022 Solum met with planning officers at the Council to discuss initial redevelopment options for the site. Officers were generally supportive of the introduction of residential dwellings on the site, and were of the view that the site has the potential to accommodate greater height and density than as specified within the Harrow & Wealdstone AAP taking into account the emerging Wealdstone context. Further discussions were held in May 2025, where this sentiment was reiterated.

Solum submitted representations to the Draft Local Plan (Regulation 18) consultation document in April 2024 in relation to the draft allocation of the site, as well as the Regulation 19 consultation document in December 2024. Solum also engaged with the Local Plan Hearing Sessions in 2025.

Comments on the Consultation Document

Site OA11 – Carpark Ellen Webb Drive (Main Modification 72)

The Council is proposing to allocate the site for comprehensive redevelopment which Solum fully supports in principle. In terms of the latest modifications to the draft allocation, Solum would offer the following comments:

Draft New Local Plan wording with Main Modifications (strikethrough for deletions and <u>underlining</u> for additions of text)		Solum Comments
Site information		
Address	Car park, Ellen Webb Drive, Wealdstone	No comments at this stage.
Area	0.32 ha	No comments at this stage.

Description	<p>Narrow semi-oval shaped parcel between Ellen Webb Drive and the railway line in Wealdstone. The site was formerly used as a carpark associated with Harrow & Wealdstone Station. Part of the site is still used, but part is now vacant.</p> <p>This site is located very near Harrow & Wealdstone Station with good connections to Central London and elsewhere, and is within the Wealdstone District Centre, making it suitable for a mixed use scheme including residential or town centre uses.</p>	<p>Suggest that the following is amended to more accurately reflect the existing situation (underlined text):</p> <p><i>"Part of the site is still used (for ad hoc maintenance), but part is now vacant (car park)."</i></p>
Current use	<u>Vacant</u> <u>Partly carpark, partly unused former carpark</u>	Solum supports this modification.
Ownership	Public	No comments at this stage.
PTAL	5-6a	No comments at this stage.
Site source	<u>Call for sites</u> <u>Allocation in Harrow and Wealdstone Area Action Plan (2013) (part)</u>	No comments at this stage.
Relevant applications	-	
Site allocation		
Site objective	Major mixed-use development to provide a residential or hotel led development with appropriate town centre use/s <u>at ground floor</u> and improvements to the public realm.	Solum supports the removal of appropriate town centre uses being restricted to the ground floor. Limiting town centre uses to the ground floor is overly restrictive.
Allocated use	Leading land use <u>Residential and/or Hotel</u> Supporting land use(s) Appropriate town centre uses Revision of car parking spaces	<i>"Revision of car parking spaces"</i> needs to be deleted as there is no longer a requirement for the car parking spaces to be reprovided; supported by the fact the parking area is closed off and redundant. This has been confirmed by Network Rail. This would then align with the other modifications below.
Development timeframe	6/10 years	No comments at this stage.
Indicative Minimum residential capacity	201-483 C3 dwelling houses / units or equivalent, or 282 C1 Hotel rooms	<p>The increase in the indicative / minimum residential capacity and the omission of the use classes is strongly supported by Solum.</p> <p>Solum supports the retention of "equivalent" as it is understood from policy officers at the Council that this term allows for other forms of housing other than traditional housing (Use Class C3) that does not have a 1 - 1 housing supply ratio such as Co-Living and Purpose Built</p>

		Student Accommodation (subject to other policy considerations).
Minimum non-residential floorspace capacity (GIA)	683sqm	<p>The inclusion of a minimum amount of non-residential floorspace is overly prescriptive and would constitute a large percentage of the overall floorspace, which would have an impact upon viability. This should be addressed through the detailed design process, where design and operational considerations will inevitably shape the final outcome. The minimum non-residential floorspace capacity (GIA) for this site allocation should be deleted.</p> <p>If the principle of a minimum non-residential floorspace capacity is retained within the allocation (which as mentioned above is not supported by Solum), then the figure currently stated needs to be reduced to c.150sqm. This is to avoid detracting from existing town centre hubs and is a quantum that would not undermine the viability and deliverability of any scheme.</p>
Planning considerations		
Flood zone	<p>Critical drainage area</p> <p>Flood zone (Surface Water) 3a – Part of site</p> <p><u>The site is at high risk of surface water flooding, particularly in the northwest of the site. The intersection of Ellen Webb Drive and Headstone Drive, is at high risk of surface water flooding.</u></p> <p><u>Development should be directed away from the west side of the site where there is higher risk of surface water flooding.</u></p>	<p>If the higher risk of flooding can be sufficiently dealt with through interventions or design measures then you should be able to develop on this part of the site. The modification should be reworded to allow for this situation.</p>
Heritage	Protected Views Setting Corridor (Roxborough Road Bridge)	No comments at this stage.
Other	Harrow & Wealdstone Opportunity Area Town Centre Boundaries (Wealdstone) RAF Northolt Safeguarding Zone	No comments at this stage.

Development considerations		
Requirements	<p>Appropriate car parking provision</p> <p>Improvement to public realm, specifically towards Harrow & Wealdstone Station and Wealdstone High Street.</p> <p>Drainage and flood risk improvements, specifically to the western end of the site and within the adjoining public realm</p>	<p>Solum supports the removal of “<i>Appropriate car parking provision</i>” as there is no longer a requirement for the car parking spaces to be reprovided. This has been confirmed by Network Rail; supported by the fact the parking area is closed off and redundant.</p>
Development principles	<p>The site is an irregular and narrow shaped site with some notable constraints that need to be appropriately address in the design and in delivery of any new development. New development must respond to the railway line (Network Rail / London underground and overground) to the rear (south) of the site, and to the public realm linking the site to Wealdstone High Street and the Harrow & Wealdstone Station.</p> <p>Car parking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Town Centre and Harrow and Wealdstone Station. New development will have to demonstrate an appropriate level of car parking. Car parking on site must ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage.</p> <p><u>Car free development except for disabled person' or operational requirements, in line with London Plan standards. Car parking on site must ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage</u></p> <p>New development must provide public realm improvements. The western part of the site is located within a flood zone, which continues into the public highway further to the west. Improvements on site should be explored to reduce flood risk on site and within the wider area. The design and layout of the site should have</p>	<p>Solum supports the removal of “<i>Car parking will continue to be required at a level that is supportive of both any new development and for the Wealdstone District Town Centre and Harrow and Wealdstone Station. New development will have to demonstrate an appropriate level of car parking. Car parking on site must ensure an active frontage onto Ellen Webb Drive is provided, whereby avoiding a blank and inactive frontage</i>”, as there is no longer a requirement for the car parking spaces to be reprovided. This has been confirmed by Network Rail.</p> <p>Solum does not support “<i>Furthermore, opportunities to improve the cycle and pedestrian environment under the Headstone Drive railway underpass should be delivered.</i>” This should be funded through Borough CIL rather than an obligation of any redevelopment of the site.</p>

	<p>regard to the recommendations detailed in the individual Level 2 SFRA Site Assessment read alongside the general mitigation requirements.</p> <p>Furthermore, opportunities to improve the cycle and pedestrian environment under the Headstone Drive railway underpass should be delivered. To the east and south east of the site is both Wealdstone High Street and Harrow & Wealdstone Station respectively. Public realm improvements should be delivered to improve the urban environment between the site and both of these destinations.</p> <p>Any form of residential development on site must ensure high quality of residential amenity, specifically addressing impacts from the railway line to the south.</p> <p>The site is appropriate for tall building development, with consideration required to be taken in relation to the protected viewing corridors towards St Mary's Church on Harrow on the Hill.</p>	
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The above comments also apply to MM59 & MM61 (where relevant).

Future Participation

I trust that the above is of assistance in the preparation of the New Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the draft New Local Plan in the future. If you have any queries or would like to discuss anything, please don't hesitate to get in contact with me.

