



OPDC Local Plan Examination

Note of potential impacts of the non-delivery of Hythe Road Station

2 August 2019

1. Role of this note

- 1.1. At the OPDC Local Plan Examination hearing session 18 (viability) which took place on 18 July 2019, the Inspector requested that OPDC produce a Public Transport Accessibility Level (PTAL) map showing the impact on future PTAL levels should Hythe Road London Overground Station not be delivered. The Inspector also requested OPDC to provide an accompanying statement setting out the evidence that the non-delivery of the station would not inhibit development capacity within Old Oak North.
- 1.2. In addition, OPDC confirmed that TfL would be providing a letter clarifying their support for the delivery of both Hythe Road Station and Old Oak Common Lane Station. This letter is attached in appendix 1.

2. Securing delivery of Hythe Road Station

- 2.1. OPDC is fully committed to securing the delivery of Hythe Road Station in partnership with TfL and stakeholders. OPDC's Local Plan identifies the importance of delivering the station. This is set out in policies SP7, SP10, P2(f) and T5. The station is identified within OPDC's Infrastructure Delivery Plan to be delivered in years 10-20 of the Local Plan period.
- 2.2. TfL has produced a business case for both Hythe Road Station and Old Oak Common Lane Overground Stations. The business case for Hythe Road Station shows that the station has a good business case (1.4:1 Benefit Cost Ratio) and the business case for Old Oak Common Lane Station shows the station is very strong (3.5:1 Business Case Ratio). However, TfL currently has not allocated a budget to meet the costs for these stations in its current business plan (2019-20 to 2023/24). OPDC will be working with TfL to consider how costs for the stations could be met from a range of public and private sector funding sources (see below). In the meantime, both stations remain a firm part of OPDC's and the Mayor's future aspirations for Old Oak and are consequently included in the Local Plan and the Mayor's Transport Strategy.
- 2.3. In relation to the Hythe Road Station, possible future funding sources include:

a) Cargiant site allocation planning contributions: Table 7.3.1 of the BNPPRE [Viability Response](#) contained at Appendix 4 of OPDC's 5 July submission illustrates that the development of the Cargiant site allocation could generate a range of £66m to £178m in planning contributions and it is possible that some of this money could go towards funding the delivery of Hythe Road Station.

b) Other site allocations planning contributions: The Cargiant site allocation would not be the only development site that would benefit from Hythe Road Station. OPDC would also look to secure appropriate planning contributions from other developments.

c) Other funding sources: Other potential funding sources that could be secured to deliver Hythe Road (and Old Oak Common Lane) Overground Stations include:

Public Sector Equity Investment

- a. Homes England Land Assembly Fund
- b. Network Rail Land Pool
- c. OPDC Development Surplus
- d. GLA Land Fund
- e. Future iterations of TfL's business plan
- f. Capital investment by host boroughs

Public Sector Debt Funding

- g. Host Borough Loans
- h. Public Works Loan Board
- i. Homes England Homebuilding Fund

Private Sector Equity Investment

- j. Development and equity investors include:
 - i. a range of funds;

- ii. institutional investors;
- iii. listed asset managers;
- iv. Real Estate Investment Trusts; and
- v. Sovereign wealth funds

Private Sector Debt Investment

- k. OPDC could consider a range of debt investments including:
 - i. project and development finance;
 - ii. private placement; or
 - iii. bond debt.

3. Policy guidance for development capacities if Hythe Road Station is not delivered

3.1. The development capacity of the OPDC area is shaped by national, regional and local policies. If Hythe Road Station is not delivered, the development capacity of Old Oak North would be considered in accordance with:

- a) National Planning Policy Framework (NPPF) (2018) paragraphs 122 and 123 in achieving appropriate densities considering the need for development, viability, infrastructure provision, local character, promoting regeneration, design and optimising the use of sites;
- b) London Plan (2016) and Draft New London Plan (July 2019) which continue to designate Old Oak and Park Royal as an Opportunity Area to deliver 25,500 new homes and space for 65,000 new jobs. Opportunity Areas are London's main reservoirs for growth. The current London Plan 2016 (Policy 2.13) supports development in these areas that potentially exceeds defined targets, by optimising development densities. The Draft New London Plan policy SD1(B)(4) (including July 2019 proposed modifications) also recognises the potential for Opportunity Areas, such as Old Oak, to establish the capacity for growth taking account of the indicative capacity for homes and jobs for Opportunity Areas;
- c) The Draft New London Plan (July 2019) Policy D1B (Optimising site capacity through the design-led approach) removes the density matrix and instead requires a broader approach that requires development to optimise capacity of sites through a design led approach that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity;
- d) Housing SPG (2016) paragraphs 7.5.7 and 7.5.8 which state that targets should be considered as a minimum, to be exceeded and accelerated where possible and that densities in Opportunity Areas may exceed the relevant density ranges in the London Plan Sustainable Residential Quality (SRQ) density matrix (table 3.2); and
- e) Local Plan policies SP9 and SP10 which seek to optimise development capacity of sites.

4. Impact on PTAL levels if Hythe Road Station is not delivered

4.1. As part of its work developing the business cases for the potential new Overground Stations Transport for London (TfL) undertook work to demonstrate the impact on PTALs if Hythe Road Station is not delivered. Figure 1 shows the future PTAL levels at 2038 as set out in OPDC's Local Plan figure 7.11 and includes the delivery of the Hythe Road station. Figure 2 shows the impact on these future PTAL levels following the removal of Hythe Road Station. These figures are attached at the end of this note.

4.2. Figure 2 shows that the impact of removing Hythe Road Station is limited to decreases from:

- 4.2.1. PTAL 6b to PTAL 6a in the east of Willesden Junction;
- 4.2.2. PTAL 6b to PTAL 6a north of Hythe Road adjacent to the Haul Road;
- 4.2.3. PTAL 6a to PTAL 5 on the north east edge of Wormwood Scrubs, to the east of Old Oak Common Station and a portion of the Grand Union Canal to the north east of Wormwood Scrubs; and
- 4.2.4. PTAL 6a to PTAL 5 on Scrubs Lane directly south of the Grand Union Canal.

4.3. In summary, in locations where impacts are shown, these locations continue to deliver excellent or very good PTALs to support the development capacities of Local Plan site allocations.

5. Impact on viability appraisals if Hythe Road Station is not delivered

- 5.1. The BNPPRE [Viability Appraisal](#) values results do not rely on Hythe Road Station being delivered. Values are supported by other new and existing transport infrastructure serving Old Oak North. This infrastructure will result in all of Old Oak North being within 5 minute walk of a number of bus routes and a large proportion of Old Oak North being within a 5 minute walk of Old Oak Common Station (providing up to 45 HS2, Elizabeth Line, GWML and Heathrow Express trains per hour, which could increase further if Chiltern Line services call there) or Willesden Junction Station (currently served by 27 trains per hour). These walking distances are illustrated in figure 3 attached at the end of this note. Services from Willesden Junction will also provide connections to stations along the West London Line, and beyond with an interchange at Clapham Junction. If Hythe Road Station is not delivered, this connectivity will remain via Willesden Junction Station.
- 5.2. It should also be noted that high densities of other regeneration schemes within London have been agreed and delivered before funding of transport infrastructure interventions has been secured. Examples include the Old Kent Road Opportunity Area and Vauxhall Nine Elms Battersea Opportunity Area.

6. Conclusion

- 6.1. OPDC is fully committed to securing the delivery of Hythe Road Station in partnership with TfL, Network Rail and stakeholders. However, in the context of the above, OPDC is confident that the development capacities and resultant densities proposed in Old Oak North by the Local Plan are appropriate and that the minimum housing targets included within the Local Plan are achievable with or without the delivery of Hythe Road Station.

Figure 1: OPDC Local Plan figure 7.11: Future PTAL with Hythe Road London Overground Station

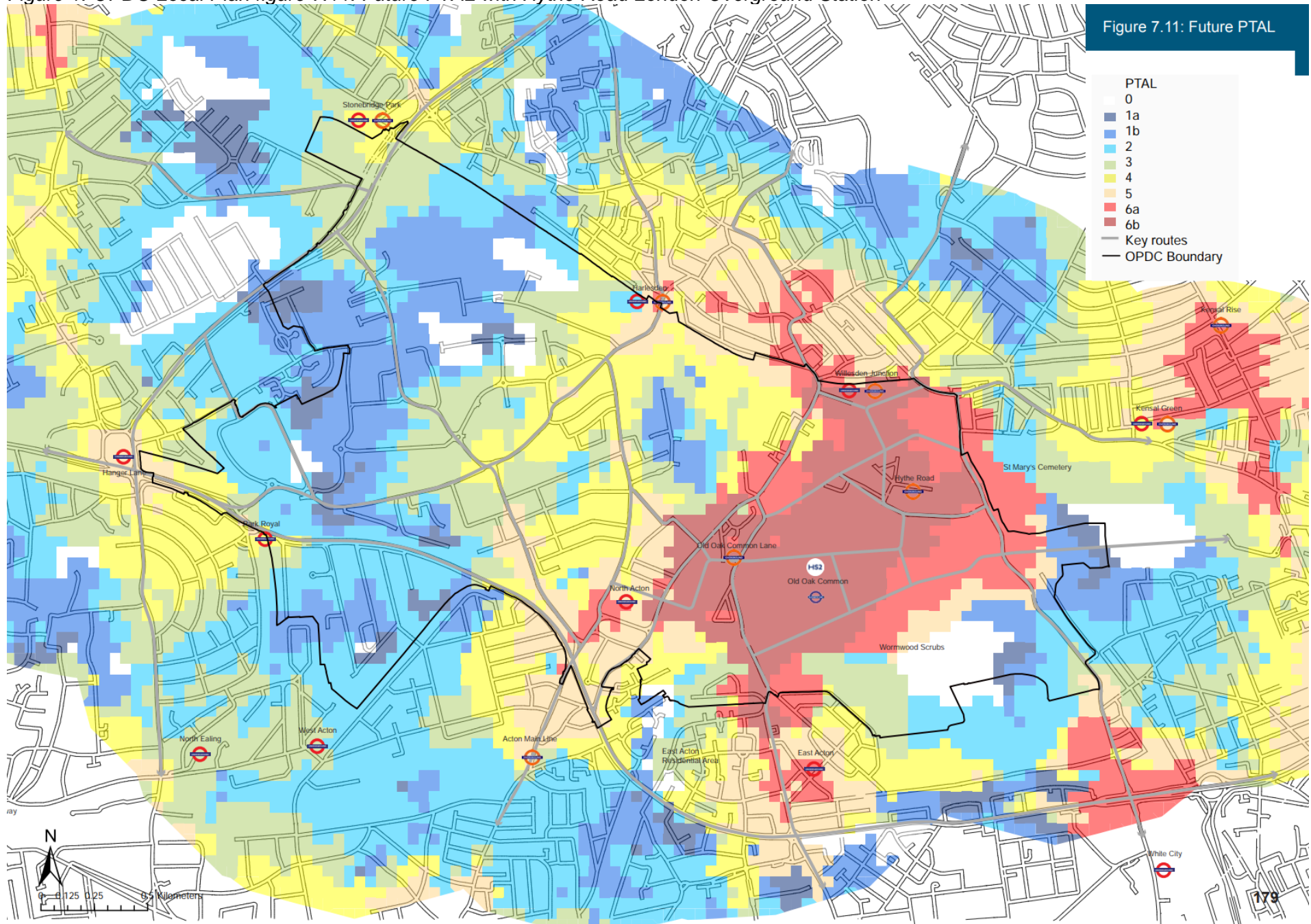


Figure 2: Future PTAL with Hythe Road London Overground Station removed

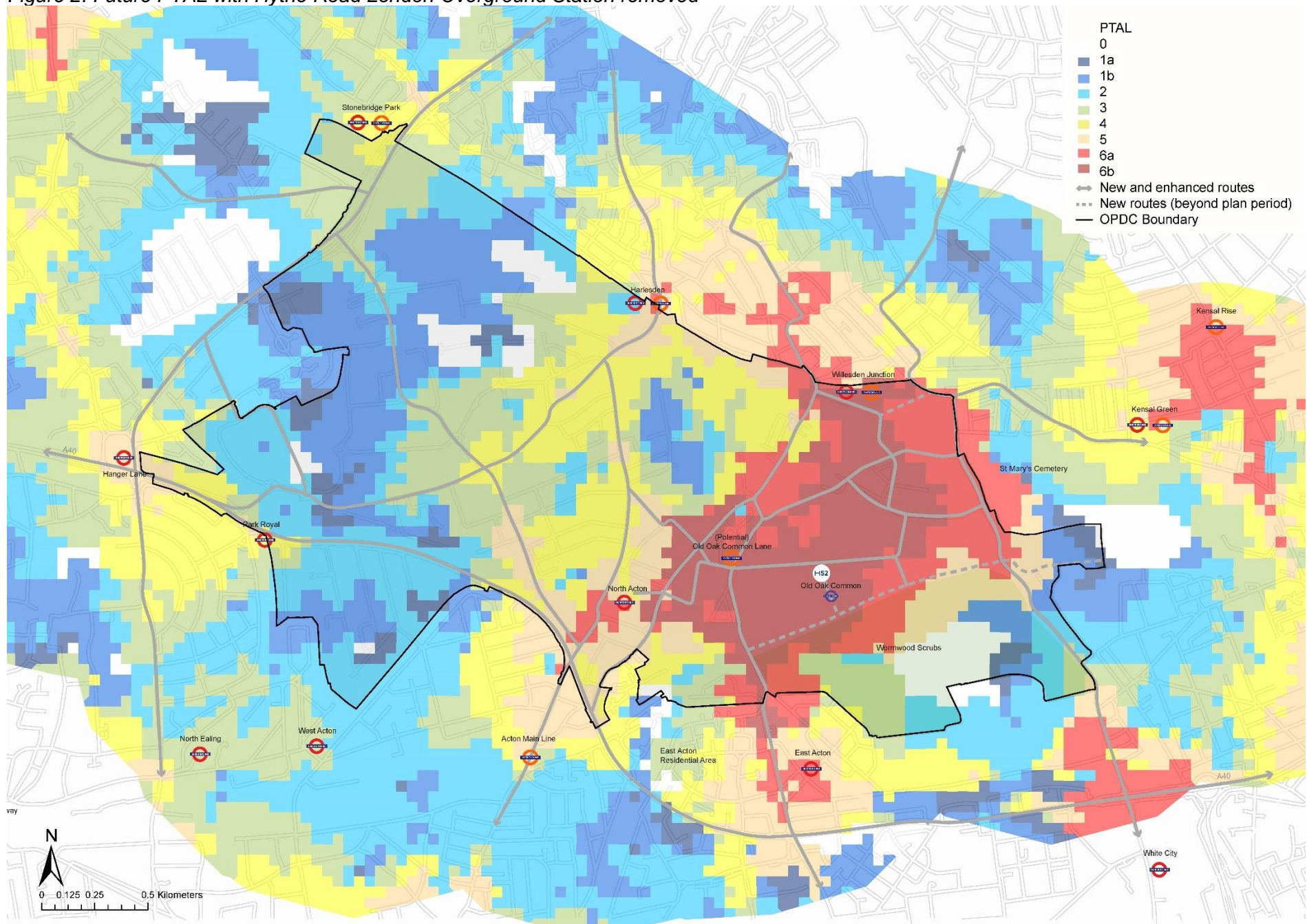
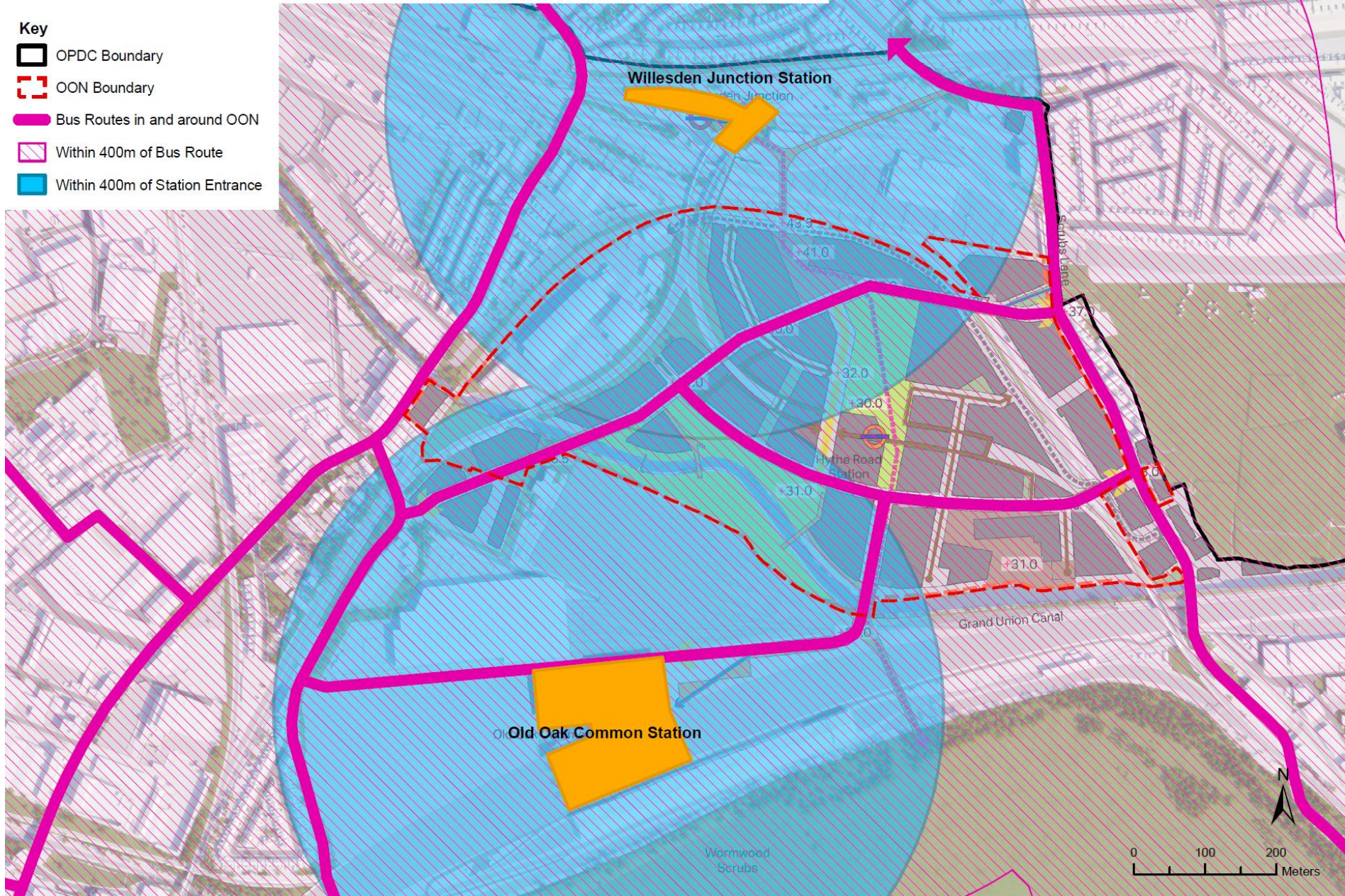


Figure 3: 5-minute walking times to future public transport access serving Old Oak North

Map showing 400 metre (5 minute walk) distance from future public transport services



Appendix 1: TfL letter clarifying support for the delivery of Hythe Road Station and Old Oak Common Lane Station



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2 August 2019

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Dear Sir

Old Oak Common – Potential New London Overground Stations

I am writing to provide you with an update on the status of the two potential new London Overground Stations at Hythe Road and Old Oak Common Lane.

As you will be aware TfL has been working closely with OPDC and other stakeholders in relation to the two potential new stations. In late 2017 we completed concept designs (to a GRIP 3 level) and a strategic outline business case for both stations. Alongside this work, in autumn 2017 we also carried out a second public consultation on the stations, focusing on their potential design.

This work has shown that the stations are technically deliverable, have a good business case and a high level of public support. TfL remains supportive of them; however, with no identified funding for the stations and with constrained funding and many other priorities, TfL is not able to provide any funding towards their delivery within its current business plan (2019-20 to 2023/24).

We are continuing to work with OPDC and local borough partners to explore a range of public and private sector funding opportunities to see if there is a package of funding that could enable the stations to be delivered. Any estimated timescale for their delivery is therefore subject to confirmation of funding.

More widely we are working with OPDC and other partners to ensure excellent walking, cycling and bus connectivity is provided across the local area to the new Old Oak Common station and also to existing stations at Willesden Junction and North Acton. We are also looking at opportunities to improve both these existing stations to enhance the role that they play in supporting local

access and connectivity. These measures will play a critical role in ensuring delivery of good growth at Old Oak Common.

Yours sincerely

A handwritten signature in black ink, appearing to read 'L Turner', written in a cursive style.

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