

P R A C T

Paddington Residents' Active Concern on Transport

RESPONSE TO CONSULTATION ON TRANSFORMATION OF OXFORD STREET

1. PRACT is a consortium, recognised by Westminster City Council, of four recognised amenity societies, whose areas cover most of the old London Borough of Paddington. Our objectives are to do with the maintenance and improvement of public transport facilities for Paddington residents.

Our general reactions

2. We are in favour of the ‘transformation’ of Oxford Street, provided that good accessibility for all is maintained. Unfortunately this proposal to fully pedestrianise parts, or all, of the Street (of which this would be only the first phase) is, in our view, impractical as being incompatible with good accessibility. However, a proposal allowing two or three buses (say initially hybrid, later electric mini-buses) might be. We think that implementation of the proposal in its current form will cause:-
 - severe damage to the quality of life (including the incidence of pollution) of those living nearby – through increasing traffic in Wigmore Street and displacing traffic into quieter, supposedly residential areas both to the north (because of traffic jams in Wigmore Street) and to the south (Mayfair).
 - damage to the viability of shops in Oxford Street (with accessibility to ordinary shops being limited far more than that to the big stores)
 - problems in the ‘public realm’, such as street entertainment, selling from carts, etc
 - security issues, especially at the designated crossing points
3. In addition the scheme as it stands includes
 - no traffic management scheme to deter displacement of traffic into residential areas
 - no considered proposals for disabled access, and difficulty for the elderly, etc.
 - no workable proposals for deliveries or emergency access
 - severe difficulties on accessibility to the shops in Oxford Street.

Why so much hurry?

4. There is no convincing evidence that partial opening of Crossrail at the beginning of 2018 will have an *immediately* large impact. In any event, passenger levels will take time to build up after the successive openings of the various sections. So we do not see the need for such a hasty move towards the ‘transformation’.
5. It is clear in the consultation material that there were many loose ends at the time consultation was launched – and there still are. For instance:-

- insufficient time to publicise the scheme amongst the many Londoners whose accessibility by bus to the whole of the centre (not only to Oxford Street) will be hindered

- no fully worked out scheme to facilitate transfer from the many curtailed bus routes to the remaining two routes, which will be diverted by way of Wigmore Street and Henrietta Place
- no certainty about what can be done for the disabled and mobility impaired
- no Strategic Environmental Assessment (SAE); it is clear that an SAE would be useful, in equity, whether or not it is statutorily required (which it may be). To us it seems little short of shocking – bearing in mind that any major planning application requires an Environmental Impact Statement – that a scheme with such far reaching consequences as this one is being put forward, apparently, without a full Environment Assessment.

If more time were allowed before a decision of principle was taken, all these things could be done and their results made public.

6. Further, we request that much more should be done to inform bus users. We have a report, for instance, that people living in Kensington know nothing about the curtailment of bus route 10; and it seems likely that is the same for people living in Camden. In the case of past changes of bus routes (e.g. the 390 bus), notification in the buses themselves happened only *after* the decision had been taken, and later we discovered that many users of the 390 bus had heard nothing at the consultation stage. We request that, once options have narrowed, the *proposed* changes of route should be publicised in the buses themselves, before final decisions are taken.

Compatibility between the first stage and later stages

7. There has been no detailed study so far of compatibility between this first stage, relating to the section between Orchard Street and Oxford Circus, and the second phase, relating to the section between Oxford Circus and Tottenham Court Road. For all we know, the second phase could require further changes to the first phase, which could be even more damaging to the residential area. The third phase (pedestrianisation between Marble Arch and Orchard Street) would, it appears, require all the buses and other traffic now using Portman Street/Gloucester Place and Orchard Street/Baker Street to transfer to a section of Edgware Road, with evidently appalling consequences.
8. The rest of this note is about accessibility, in particular by bus – but please see our conclusions at the end (at paragraphs 20 to 23).

The disabled and mobility impaired

10. Whatever can be done for the fully disabled, full pedestrianisation also implies considerable difficulty for the elderly, the mobility impaired and mothers with young children and parcels, in walking to reach buses in Henrietta Place or the entrances to the Crossrail Station at Bond Street. This will impair footfall and reduce the numbers of shoppers in Oxford Street (coupled with the general disincentive of having to change bus, from most points of origin).

Ultimate impact of Crossrail

11. In addition to these apparently intractable problems, it is far from clear that the opening of Crossrail will indeed add very much to the numbers of shoppers – it could equally favour access to out of town shopping centres such as Westfield at Stratford. Crossrail provides an incentive for the

creation of other hyper-shopping centres along its route, for instance, one could well be proposed in the Ealing area. Estimates of the ultimate impact of Crossrail must be speculative at this stage, so the whole scheme may be based on an over-estimate of the impact of Crossrail.

BUSES AND FULL PEDESTRIANISATION OF OXFORD STREET

12. With these points in mind, it is still necessary to point up severe deficiencies in the proposals for bus routes with full pedestrianisation of Oxford Street (between Orchard Street and Oxford Circus) – as they appeared in the consultation documents. A later section covers the welcome, albeit partial, proposals for mitigation which are now being worked upon, based on a meeting of 13 December with officials from WCC and TfL.

Buses – problems with the proposals as they appear in the consultation documents

- 13.1 **Chaos at Marble Arch.** Six routes, 7, 10, 23, 94, 98 and 113, which currently go along Oxford Street, would either terminate at, or pass through, Marble Arch. The drawings indicate final stops in Edgware Road, Bayswater Road, etc. For the first four of these (7, 23, 94 and 98), interconnection with the single route (the 390) that would connect Marble Arch with Wimpole Street etc. would involve quite long walks – difficult for the elderly. In the outward direction (leaving Oxford Street), several streets would have to be crossed to interconnect between the 390 and these four routes. Further, in order to reach Regent Street from or to any point in Paddington/Bayswater, two changes of bus would be needed.
- 13.2 **Likely overcrowding of the 390 bus.** Five routes, 7, 10, 23, 94 and 98 would feed into it at Marble Arch. Only two routes, 113 and 159, would feed into the 390, and in different directions. This severe imbalance would probably lead to overcrowding of the 390 in its central section, and thus to a need to increase its frequency over its whole route, so adding to the number of buses on Wigmore Street.
- 13.3 Even with some improvements, Paddington and Bayswater would be largely cut off, by bus, from the whole of central London, and not merely Oxford Street. It would be far better to keep a limited number of bus routes on Oxford Street, and there are also the other more fundamental difficulties with full pedestrianisation, as mentioned above. We don't accept that the opening of Crossrail mitigates these losses, because a change from bus to Crossrail at Paddington is cumbersome and requires a second fare to be paid.
- 13.4 **Marble Arch, detail, as in the consultation documents.** *Routes 7, 23, 98.* Inward to Oxford Street We do not regard the walk from the last stop in Edgware Road to the first stop in Oxford Street (for the 390) as acceptable. Outward from Oxford Street. The walk from the last stop of the 390 on Oxford Street to stops in Edgware Road would be quite unacceptable. *Route 94* – situation completely unacceptable, in both directions (but see below).

Buses – Mitigation as now apparently proposed.

14.1 **Basic features**

Route 94. Would run into Oxford Street, connect with the 390 (inward) at a stop near Marble Arch, go to a stand in North Row, leave its stand by way of North Audley Street (direction of flow reversed) and pick up, in the outward direction, at the last stop in Oxford Street of the 390.

14.2 We strongly endorse this welcome proposal and hope that it will be implemented.

- 14.3 Routes 7 and 98. Would pass through Marble Arch in the inward direction, go southwards to Grosvenor Gate, do a 'U' turn there, and go to stands in Park Lane (northbound). It is an open question whether they would set down and pick up at stops in Park Lane, near to Marble Arch.
- 14.4 Assessment – without stops in Park Lane (for the 7 and 98). In the inward direction, there would be a long walk of some 200m, to interchange between the last stop in Edgware Road of routes 7, 23 and 98 and the 390's stop in Oxford Street. In the reverse (outward) direction, it would be necessary to walk a very long way, across several traffic streams, between the 390's stop in Park Lane and the first northbound stop in Edgware Road – we regard this as quite unacceptable.
- 14.5 Assessment – with stops of 7 and 98 in Park Lane. For the reverse (outward) direction, there would be some reduction in inconvenience, if it proves practical, as is apparently proposed, to create a new pedestrian crossing over both arms of Park Lane, just south of Marble Arch.
- 14.6 Conclusion on routes 7 and 98 We strongly request that buses on both these routes should set down and pick up at stops in Park Lane, and we endorse the new pedestrian crossing. We do not, however, regard as acceptable a situation in which, for interchange with the 390, long walks from/to three bus routes (7, 23 and 98) would be needed – see the next section.
- 14.7 Other routes: interchange at Marble Arch to and from the 390 Route 23/10 from and to the north: as for routes 7 and 98, see above – not good. Route 10/23 from and to the south: OK, interchange with route 390 at stops in Park Lane.

Buses – further mitigation, as now apparently under consideration.

- 15.1 It would be far better if one of the three routes 7, 23 and 98 could, like the 94, proceed into Oxford Street and set-down/pick-up at a stop of the 390, in both directions. In that event transfer from the other two routes could be made at stops in Edgware Road, evidently involving two changes, but easy ones. (We add route 23 to this list, on the basis that – if it proved most suitable because its catchment area was the largest – the combination of route 10 with another route could be with either the 7 or the 98.)
- 15.2 We strongly endorse this objective, which (we understand) requires finding space for another bus stand either north or south of Oxford Street.

Connections between Bayswater /Paddington and points beyond Oxford Street.

- 16.1 At present route 94 goes to Piccadilly Circus, and route 23 goes to Piccadilly Circus, Trafalgar Square, Aldwych and beyond. Connections after the proposed changes: from/to points on *route 94*, from Shepherds Bush, take the 148 and transfer to route 6 at a stop in Park Lane; from/to points on *routes 7, 23 and 98*, transfer to route 6 at a stop in Edgware Road
- 16.2 A direct service to points beyond could be provided if route 7 or 23 were extended to Piccadilly Circus (or further), going by way of Hyde Park Corner, like route 6. If the terminus were at Piccadilly Circus, it could use the present stand for the 94, in Charles II Street. This would

alleviate the stand/stop problem for these two routes in Park Lane. It appears to us, however, that – considered as an alternative – this has lesser priority than the proposal in paragraph 15.1 above.

16.3 From/to *points east of* Oxford Circus: transfer to route 390

Facilitating interchange

- 17.1 In many instances, interchange will be possible, at points where – for other reasons – there is only a single stop, rather than two stops arranged according to destination and separated. There are single stops like this in Edgware Road and in Park Lane. Where no such single stop exists at points suitable for interchange, we request bringing together the stops at these points.
- 17.2 Further, we ask for consideration of adapting the automatic announcements in buses, for these stops, so as to add ‘change here to route x’ or ‘change here to route 390 for the Oxford Street area’ (or similar) – as in the London Tube and Underground.
- 17.3 It is essential that the announced proposal to adapt the ‘Bus Hopper’ facility, so as to permit up to three changes of bus without further charge, should be implemented at the same time as these changes.

Other matters affecting buses

18. We think that the new situation requires a full review of pedestrian crossings, the hours of operation of bus lanes and of permitted loading in the streets affected – especially Edgware Road.
19. We request that all new bus stops, and existing stops used for interchange, should have shelters and the usual screen giving information about wait times.

Conclusion on buses.

20. Despite the suggested mitigation described above, we cannot see any satisfactory solution, avoiding the very substantial inconvenience (especially to the mobility impaired), caused by truncating or diverting so many bus routes. This is not only a question of accessibility to Oxford Street, it is question of not cutting off direct east-west links by bus between points often far to the east (or north or south) of Oxford Circus and points often far to the west (or south or north) of Marble Arch.
21. Should full pedestrianisation nevertheless go ahead, we request mitigation in all the aspects described above (at paragraphs 6, 14.2, 14.6, 15.2, 17.1-3 and 19), and consideration of extending bus 23 to Piccadilly Circus (merging bus 10 with another) – see paragraph 16.2.

General conclusion

22. Both on grounds of accessibility (buses, the mobility impaired) and on the general grounds set out in paragraphs two and three above, we do not think that full pedestrianisation of Oxford Street is practical. ‘Transformation’ in a form which would allow two or three routes of hybrid or electric buses, or electric mini-buses, to pass through Oxford Street (reducing pollution from the present nine routes), and perhaps electric taxis, might be practical. If more time were allowed, a better scheme could emerge.
23. We deplore the absence of any detailed proposals on how to cater for the disabled and mobility impaired, and we are very doubtful that a satisfactory solution for them can be found _

John Walton

PRACT

20 December 2017

