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COMPANY

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New West End Company's response to the WCC/TfL consultation on the transformation of Oxford Street

JUNE 2017



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Have your say on the transformation of Oxford Street

Response by New West End Company

Executive summary

1. INTRODUCTION

New West End Company welcomes the opportunity to respond to this consultation. Our response is based upon the professional Business Study, 'A Future for the Oxford Street district', that we have commissioned over the past two years. This study provides a clear aspiration and practical guidance for the transformation of the Oxford Street district. The Business Study builds on this current consultation to illustrate how the full potential of the Oxford Street district can be realised for the benefit of businesses, residents, visitors and employees.

2. CONTEXT AND CHALLENGES

Oxford Street is a monocultural street, made-up predominantly of shops, in a time when global shoppers are demanding a wider mix of activities to create a positive experience when shopping. To take advantage of the once-in-a-generation opportunity for change brought about by the opening of the Elizabeth Line, New West End Company believe that there are five key challenges to address.

Three of these are wellbeing challenges, some of which are caused by the traffic congestion, which will get worse with the expected increase in visitor numbers when the Elizabeth Line opens and as London's population increases. These challenges are:

- Very poor air quality
- Poor road safety
- Inadequate public realm

The other two challenges are growth-limiting. They need to be addressed if the West End is to realise its full economic potential and if the ambitious job creation targets of WCC are to be met. These challenges are:

- A shortage of commercial workspace
- Evolving retail trends and fierce global competition

RESPONSE TO QUESTION 1: THE NEED TO TRANSFORM OXFORD STREET

3. New West End Company supports the transformation of Oxford Street to address these challenges.

RESPONSE TO QUESTION 2: ADDRESSING THE CHALLENGES OF OXFORD STREET

4. Addressing wellbeing challenges

In considering traffic reduction in the West End and traffic-free options for Oxford Street, New West End Company suggests the following elements are required:

- Traffic reduction in the West End must be achieved by a genuine reduction throughout the West End and not through large-scale redirection of traffic onto side streets
- All proposals for traffic-free options must be accompanied by an economic impact study to assess how each will affect West End businesses, not just in Oxford Street but on the other main shopping streets, so that any chosen proposal enhances retail performance on Oxford Street and the wider West End
- Any proposal must allow businesses to operate effectively
- Any proposal must enhance the experience for visitors, employees and residents
- Any proposal must include long-term management schemes for the traffic free areas

New West End Company has defined three key changes that we believe should be made by the time the Elizabeth Line opens:

- At least a 50% reduction in traffic entering Oxford Street and Regent Street
- Removal of the worst polluting vehicles from our streets and aim for all public transport and, where possible, service vehicles entering the area to use only electric power
- An accelerated introduction of the Ultra Low Emission Zone

Our preferred traffic-free option for Oxford Street is that between 10am and 10pm blocks of Oxford Street should be traffic-free with some or all of the north-south routes remaining open. Our views on buses, taxis and deliveries reflect this option with certain north-south routes used to enable shoppers to access bus and taxi services.

5. ADDRESSING GROWTH-LIMITING CHALLENGES

New West End Company recommends that a clear and ambitious aspiration for the Oxford Street district should be adopted.

We recommend that intensification of use and higher buildings should be allowed within the Oxford Street district to provide the necessary commercial space to accommodate future growth as set out in the West End Partnership's vision.

We recommended that Oxford Street should be given the ability and encouragement to evolve to meet global retailing demands. This would require:

- Encouraging a broader range of uses including leisure, culture and civic amenities
- Expanding the boundaries of the International Shopping Centre and West End Special Retail Policy Area into surrounding streets
- Promoting the evening economy
- Developing and promoting a cultural strategy
- Preparing planning and design guidance that will help deliver the long term vision

RESPONSE TO QUESTION 3: LOOK AND FEEL

6. Public realm and management

New West End Company believes that the public realm across the Oxford Street district should be of a high quality to reflect its function and identity as an international shopping centre.

A robust management plan for a traffic-free Oxford Street should be created involving all relevant local parties and clearly identifying the necessary resources to enable the plan to be delivered and enforced.

New West End Company response

1. INTRODUCTION

- 1.1 New West End Company welcomes the opportunity to contribute to the ‘Transformation of Oxford Street’ consultation being undertaken by Westminster City Council (WCC) and Transport for London (TfL).

New West End Company

- 1.2 New West End Company is the Business Improvement District for the major shopping streets of London’s West End. Comprising an Occupier BID and a Property Owner BID, we represent over 600 retail, hotel and property companies in and around Oxford Street, Regent Street and Bond Street. We are a leading business voice in the West End.
- 1.3 New West End Company has worked closely with WCC and TfL over twelve years to promote the growth of the West End and to address many of the issues that the district faces. In particular we three organisations are all members of the West End Partnership (WEP) which brings together representatives of all the major communities and interested parties in the West End to plan for its successful and sustainable growth.

Scope of response

- 1.4 We note that, while WCC and TfL’s vision for Oxford Street applies to its entire length, the current consultation relates to the transformation of that section of Oxford Street between Orchard Street and Oxford Circus. Our response covers this section but our recommendations also relate to the wider context of the whole Oxford Street district and the wider West End.
- 1.5 We strongly believe that the scope of the first phase should be extended to include all of Oxford Circus, both east and west, in order to retain the integrity of this iconic landmark crossroads.

How we have developed our response

- 1.6 New West End Company has welcomed and supported developments and growth plans for the West End. In particular, through the WEP, we have supported a vision for the West End that takes account of major changes, particularly the opening of the Elizabeth Line in 2018 and the forecast population growth of London, to ensure that the West End is prepared for and maximises the benefits from the expected visitor and employment growth in the district. This includes the sufficient provision of commercial space, the safe and comfortable accommodation of significantly larger numbers of people on our streets and the retention of heritage and residential elements in order to ensure that the West End remains one of the world’s best places to live, work, invest and visit.

- 1.7 We believe that the opening of the Elizabeth Line, and the investment required to support it, provide a once-in-a-lifetime opportunity to take a longer term view of the West End's future and the measures needed to secure it. This goes beyond the transport and public realm improvements needed to accommodate additional visitors. It should also look at the policies and investments that will enable the West End to grow in ways that reflect and respond to the development of international shopping and entertainment centres worldwide.
- 1.8 Plans to remove most or all of the traffic from Oxford Street will reassert the primacy of this iconic street as an economic zone rather than a local traffic corridor. The opportunities caused by this transformation, if seized by the public and private sectors, can create thousands of new jobs, generate millions of pounds of extra turnover and produce huge additional income for Westminster and the Mayor to spend on their local priorities.
- 1.9 In 2015 New West End Company commissioned an extensive study of the Oxford Street district combining the expertise of Publica (urban design and public realm consultants), Gerald Eve (international property consultants) and Volterra (economic consultants). Over a two-year period these consultancies have worked together to demonstrate the need for a bold, holistic aspiration for the future of the Oxford Street district and to suggest the policy, partnership and financing initiatives that will be required to deliver that aspiration.
- 1.10 Launched at the London Real Estate Forum in June 2017, this study has provided the evidence base for the creation of a strong, clear and deliverable aspiration for the Oxford Street district. The aim of this aspiration is to inspire all West End and London stakeholders to support a farsighted and holistic future for the Oxford Street district for the benefit of all local communities, whether these be businesses, employees, residents or visitors. It will demonstrate how the once-in-a-generation opportunity offered by the opening of the Elizabeth Line could create, over time, a renaissance for this major shopping street, to halt its decline and establish it as a significant positive contributing element, helping to secure the wider West End's future as a global shopping, entertainment and commercial district, and one in which it is a pleasure to live.
- 1.11 This study also informs New West End Company's response to the current consultation and it will be referenced throughout. The study and supporting evidence base are available on our dedicated Oxford Street district website (www.oxfordstreetdistrict.com). The Business Study comprises two distinct elements: an evidence base called 'Oxford Street Today' and a document, 'A future for the Oxford Street district', which uses that evidence to suggest what a new Oxford Street district could look like. 'Oxford Street Today' is supported by a series of appendices on the economic performance of the district and the relevant planning policies that currently determine future development in the district and their implications on its future growth.
- 1.12 Our responses to the specific issues raised in the 'Transformation of Oxford Street' consultation paper are based on our study for the future of the Oxford Street district. The recommendations we make in this document would enable a shared aspiration for the future of the Oxford Street district to be supported and practically delivered by public and private sector partners.

- 1.13 During the consultation period, we have sought the views of West End business, employees, visitors and residents on our proposals to help inform our response and measure the level of support for our recommendations. In particular we have held two business workshops, attended by over 40 West End businesses, created and promoted a dedicated Oxford Street transformation consultation micro-site, commissioned ComRes to undertake surveys of shoppers, employees and residents to seek their views on our proposals, met resident groups, and sought input to and comments on our response from our board, property steering group and key stakeholders. We will publish the various survey results as a separate document when they have been completed.
- 1.14 New West End Company recognises that the unique strength and appeal of the West End is the substantial mix of world class retail, leisure and entertainment facilities in a district that has retained its character as it has evolved and which contains a strong and thriving residential community, contributing additional life and character. Our recommendations and our aspiration reflect the power of this diversity and seek to enhance each aspect and use in the West End.
- 1.15 We are very sensitive to the interests of local residents in the West End. New West End Company has developed strong and productive relationships with all the key community groups and our senior staff members play active roles on four West End Neighbourhood Forums. We work together with local resident representatives as fellow members of the West End Partnership. We firmly believe that business and residents share many of the same benefits from a thriving West End as well as the desire to improve its overall economic, built and natural environments. A thriving West End with constant new investment and the addition of innovative experiential retail, culture and entertainment to an already world class district makes it a wonderful place to live. But together we need to tackle problems of air pollution, congestion, a poor quality public realm and overcrowded streets in order to provide benefits for residents as much as businesses and visitors. We are aware of issues that cause particular concerns to residents and so we do not, for example, support a late night economy in the district. We work to ensure that Sunday mornings remain peaceful and calm and we argue that traffic reduction on the main shopping streets should not be achieved by redirection through residential streets but through a genuine reduction in bus routes through the West End.

2. CONTEXT AND ISSUES

- 2.1 In this section we outline the context for our responses, based on our Business Study. First we look at the current state of the Oxford Street ditrict within the global shopping and commercial context. Then we examine the specific challenges faced by the district. These are the issues that our response seeks to highlight and recommends that WCC and TfL should address.

Oxford Street today

- 2.2 Alone, as a single, relatively monocultural retail street, Oxford Street cannot continue to compete with modern shopping malls and town centre retail destinations which offer better integrated retail, entertainment and leisure

experiences for visitors. In addition, the growth of online retailing means that major shopping districts must offer visitors an experience that is more than just shopping to provide a distinctive appeal to current and future shoppers.

- 2.3 Oxford Street has for some time been showing signs of decline both in terms of its physical appearance and its attractiveness to shoppers. Footfall is in decline, particularly in the western section of the street. Surveys of visitors point to concerns about the poor quality public realm, overcrowding of pavements, traffic, lack of cleanliness, a poor food and drink offer and a lack of amenities such as public toilets and places to sit.¹ Oxford Street's decline comes at a time when other regional and global shopping centres are growing and providing shoppers with high-quality facilities.
- 2.4 But if Oxford Street were to be considered part of a diverse district, better integrated into the wider West End, it could provide a unique wealth of retail, offices, amenity, homes, culture and leisure. This would ensure that it delivers economic growth, responds to emerging trends in retail and working, capitalises on the opening of the Elizabeth Line in 2018, and captures opportunities to offer an unparalleled shopping experience for Londoners and visitors in years to come.
- 2.5 The Crown Estate's ongoing transformation of Regent Street has demonstrated what can be achieved when there is a clear vision for the shape, style and content of a major London shopping street. We believe that a similar, wide-ranging vision should be adopted and delivered for the Oxford Street district.

Challenges

- 2.6 Like much of the rest of the West End and London, the Oxford Street district is facing a number of challenges today. These challenges currently prevent the district from realising its full potential. If they are addressed however, the Oxford Street district's economic performance, its identity and position as one of the world's leading retail and business destinations, and the wellbeing of all who visit, live and work here will be enhanced and safeguarded for the future.
- 2.7 New West End Company has identified two groups of challenges for Oxford Street. The first group contains wellbeing challenges for visitors, employees and residents and the second group refers to growth-limiting challenges.

Wellbeing challenges

Oxford Street suffers from high levels of vehicle traffic and congestion. This creates major wellbeing challenges that detract from the district's appeal for residents, visitors and investors.

- *Very poor air quality*: in part due to the high number of buses on Oxford Street, local pollution rates are three times higher than the legal limit set by the EU, and annual limits for nitrogen dioxide emissions are typically breached within the first few days of each new year.²

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1 Oxford Street Today, page 60

2 Oxford Street Today, page 67

- *Poor road safety*: research by the Department of Transport published in 2015 cites Oxford Street as being the location of three of the top ten accident hotspots in the country.³ All of these are on the western section of Oxford Street.
- *Inadequate public realm*: in 2013 a report by the Roads Task Force stated that “traffic movement (on Oxford Street) conflicts with the place functions for visitors and shoppers, contributing to high levels of pedestrian crowding on footways”.⁴ Poor quality public realm and limited amenities mean that the current pedestrian environment is no longer sufficiently safe or pleasant for visitors to the district, and connections between the street and its surroundings are often unclear.

Growth-limiting challenges

Simply providing a new transport link, in the form of the Elizabeth Line and undertaking transport and public realm improvements to accommodate new visitors does not in itself guarantee the future success of a district. To maximise the impact of these significant transport investments we need to ensure that the district is able to grow in ways that are appropriate to its heritage and mix of uses but which reflect the requirements of a global shopping and commercial district. We have identified two key challenges to successful economic growth.

- *A shortage of commercial workspace*: the Oxford Street district and the wider West End face an employment floorspace capacity shortfall that will, without intervention, weaken London’s competitiveness, and hamper WCC’s ambitions to create 77,000 new jobs in the borough by 2036. The Elizabeth Line will be a key commuter line into central London and we need to ensure that there is the commercial space available to accommodate new and growth businesses.
- *Evolving retail trends and fierce global competition*: in an age of online shopping, high street retail is increasingly moving away from traditional commerce, towards leisure, entertainment and experience. Oxford Street’s competitors – both within London and further afield – are better at meeting the needs of future shoppers by providing more attractive shopping destinations.

2.8 The wellbeing challenges will soon get far worse if nothing is done. The opening of the Elizabeth Line in 2018 is expected to bring an additional 60 million people to the West End each year by 2020, contributing nearly a third more than the current 200 million annual visits. In addition London’s population is forecast to grow from 8.6 million today to over 10 million in 2031.⁵ The current Oxford Street district will not support these significant increases in visitor numbers safely and comfortably.

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3 Oxford Street Today, page 73

4. Oxford Street Today, page 125

5 TfL consultation ‘Have your say on the transformation of Oxford Street’

2.9 With increasing global competition the West End needs to be enabled and encouraged to respond to evolving shopping trends. The growth-limiting challenges prevent Oxford Street and the wider West End from reaching its economic potential for the benefit of the wider district, London and the UK. WCC has set ambitious growth and job creation targets and to achieve them we believe that these growth-limiting challenges need to be addressed.

Q1 “Our consultation explains why we believe it is necessary to transform Oxford Street. This would mean however potential changes for buses, taxis, cyclists and vehicles making deliveries or servicing businesses. Bearing in mind the changes we would need to make do you agree with the transformation of Oxford Street in principle?”

3.1 New West End Company fully supports the transformation of Oxford Street but in ways that will address the wellbeing and growth-limiting challenges. We are comfortable with the changes that would be necessary to make this possible so long as certain requirements are addressed as outlined in section 4.9, below.

Q2 “Our consultation materials describe the various challenges we would need to address to achieve our vision for the transformation of Oxford Street. We have described possible changes to access arrangements for buses and taxis, and we have explained what the transformation of Oxford Street may mean for cyclists and for freight and servicing. If you have any comments about these and other issues, please record them below.”

4. WELLBEING CHALLENGES

4.1 In answer to this question we focus, in section 4, on the wellbeing challenges, which relate to traffic and public realm issues. In section 5 we examine the growth-limiting challenges.

The need for large scale traffic reduction in the West End

4.2 Since its formation, New West End Company has campaigned for significant reduction in traffic in the West End. We believe that this would be one of the most important improvements to the West End. Current congestion leads to:

- Very poor air quality
- Poor road safety
- Pavements that are uncomfortably crowded at peak shopping times due to lack of additional space

4.3 West End businesses are concerned that, over time, this level of congestion and the problems caused by it will lessen the West End’s attractiveness to residents, visitors, investors and businesses. It will also make the district a less pleasant place in which to live and work. In September 2016 the Chair of the London Assembly Transport Commission wrote to the Mayor saying “Oxford Street is currently a dangerous and dirty destination for pedestrians in the capital - with poor air quality and high numbers of casualties. Something’s got to give and it’s

got to give now. Without significant change to make the area cleaner and safer for Londoners and visitors to the city, the global reputation of Oxford Street is at risk”.

- 4.4 Despite marginal changes aimed at relieving the volume of traffic in the West End (e.g. the previous Mayor’s commitment to a 10% reduction in bus travel on Oxford Street each year for three years and the introduction of freight and waste consolidation schemes by The Crown Estate on Regent Street and New West End Company on Bond Street) the practical impact has been very limited. Traffic congestion is still a major problem in the West End.
- 4.5 In 2010 the London Assembly’s Transport Committee concluded, in its report ‘Streets Ahead: Congestion on Oxford Street, Regent Street & Bond Street’, that “various schemes to reduce traffic congestion and improve the pedestrian experience in one of the world’s premier shopping destinations may not be enough, prompting a call for more radical thinking. At the heart of the problem is the conflict between the need to provide a pleasant shopping and leisure environment, and meeting the demand for transport links through the West End”.
- 4.6 New West End Company has been particularly concerned about the number of buses that use Oxford Street as an east-west link road and which, outside commuter hours, are often largely empty. On average there are 18 passengers on each bus on Oxford Street, indicating that these buses are not operating at efficient carrying capacity.⁶ We do not believe that these near-empty buses effectively serve West End shoppers or employees. We have argued that the West End, as a designated International Shopping Centre in the Mayor’s London Plan and zoned as the West End Special Retail Policy Area in WCC’s City Plan, should prioritise the interests of shoppers, but until recently these appear to be secondary to the interests of terminating bus routes.
- 4.7 New West End Company therefore welcomes the Mayor’s recent announcement (April 2017) of a 40% reduction in bus routes on Oxford Street.⁷ We are particularly pleased that this will be achieved by removing unnecessary bus routes from the West End rather than by diverting them off the main shopping streets onto nearby residential streets.
- 4.8 While traffic reduction in the West End is important currently it will become an imperative when the Elizabeth Line is opened. Streets that are currently crowded with the 200 million people who visit the area each year will have to accommodate an estimated additional 60 million people each year. We therefore support the consultation’s proposals for creating a traffic-free element to Oxford Street made possible by large-scale reduction in bus routes into the West End, not by the redirecting of current routes through nearby residential streets. We are pleased that the Mayor has turned this manifesto commitment into a policy priority.

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⁶ Oxford Street Today, page 69

⁷ TfL press release ‘TfL confirms changes to bus routes in central London’, April 17th 2017

Requirements for traffic reduction on Oxford Street

- 4.9 In considering traffic reduction in the West End and traffic-free options for Oxford Street, New West End Company suggests the following elements are required:
- Traffic reduction in the West End must be achieved by a genuine reduction throughout the West End and not through large scale redirection of traffic onto side streets
 - All proposals for traffic-free options must be accompanied by an economic impact study to assess how each will affect West End businesses, not just in Oxford Street but on the other main shopping streets, so that any chosen proposal enhances retail performance on Oxford Street and the wider West End
 - Any proposal must allow businesses to operate effectively
 - Any proposal must enhance the experience for visitors, employees and residents
 - Any proposal must include long-term management schemes for the traffic free areas
- 4.10 New West End Company recommends that, in assessing each traffic-free option, TfL and WCC should examine the performance of different traffic-free schemes in major shopping streets in the UK and worldwide to understand what works and what does not. New West End Company's Business Study has already begun this process through an analysis of local and international precedents.

Elizabeth Line opening position

- 4.11 The Elizabeth Line is scheduled to open in the West End in December 2018. New West End Company has defined three key changes that we believe should be made by the time that the West End stations on the Elizabeth Line open. These are:
- At least a 50% reduction in traffic entering Oxford Street and Regent Street
 - Removal of the worst polluting vehicles from our streets and aim for all public transport and, where possible, service vehicles entering the area to use only electric power
 - An accelerated introduction of the Ultra Low Emission Zone

Traffic-free options

- 4.12 The Mayor committed in his manifesto to the pedestrianisation of Oxford Street, stating that one of his 10 priorities was to “restore London’s air quality to legal and safe levels, with action to make travel greener and pedestrianise Oxford Street.”⁸ He stated that he would “work with Westminster Council, local businesses, Transport for London and taxis, to pedestrianise Oxford Street. I will start by bringing back car-free days, and possibly weekends, before moving towards full pedestrianisation. Our eventual ambition should be to turn one of

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8 A Manifesto for all Londoners, Mayor of London (2016)

the world's most polluted streets into one of the world's finest public spaces – a tree-lined avenue from Tottenham Court Road to Marble Arch.”

4.13 New West End Company welcomes this commitment but realises that there are a number of ways to deliver a traffic-free Oxford Street based on the physical extent of the traffic-free area and the timing of it. We consider here the main options, based on our requirements set down in section 4.9. While we recognise the limited scope of this current consultation our response refers to the whole of Oxford Street.

4.14 When looking at the physical extent of any traffic free areas we believe there are two main options:

Traffic-free from Marble Arch to Tottenham Court Road – we do not support this option because:

- The mile-long route would be too long for many visitors to walk, particularly those with limited mobility or parents with buggies
- Shoppers would not have easy access to buses and taxis
- Businesses would have difficulties with deliveries and other operational matters
- Closing north-south routes would severely disrupt traffic in central London

Traffic free blocks with all or some north-south routes remaining open – this is our preferred option because:

- Shoppers will still experience a traffic-free shopping environment
- Shoppers can access buses and taxis on certain north-south routes
- Delivery vehicles can operate from certain north-south routes
- Each block will be easier to manage

4.15 When looking at the timing of any traffic-free options we believe there are also two main possibilities:

24 hour traffic-free – we do not support this option because:

- It reduces options for deliveries
- It creates an unanimated area during the night time, when there will be few pedestrians, which can lead to management problems

Traffic-free from 10am to 10pm – this is our preferred option because:

- It allows for deliveries
- It provides activity on Oxford Street throughout the night which helps deter antisocial activity

4.16 Our preferred option is therefore that between 10am and 10pm blocks of Oxford Street should be traffic-free with some or all of the north-south routes remaining open.

4.17 Assuming that this option is adopted we would add the following points:

- Some form of surface level east-west public transport should be provided along Oxford Street during 10am and 10pm, but in ways that do not interfere with pedestrian priority. This would assist visitors who are elderly, disabled or simply do not wish to walk the full length of Oxford Street.

- Work would be required on certain streets and junctions outside the immediate Oxford Street area to enable them to accommodate traffic movement and to provide space for taxis, buses and delivery vehicles to operate.
- Regent Street is the main north-south route through Oxford Street and like Oxford Street it requires traffic reduction. It would not be acceptable to increase traffic on Regent Street as part of a scheme for a traffic-free Oxford Street.
- All public realm works should be of a quality that reflects and enhances the position of the West End as a world-class shopping district.
- Additional traffic-free activities on other streets should also be considered, such as the events currently undertaken on Regent Street. We believe, for example, that there is scope for other traffic free days in the West End, without supporting events, as a way of monitoring the impact on air pollution.

Buses

- 4.18 New West End Company's preferred traffic-free option for Oxford Street would result in buses crossing Oxford Street on certain north-south routes during the day. We do not believe that there should be any bus routes along Oxford Street between 10am and 10pm. Buses could be permitted along Oxford Street between 10pm and 10am, animating the street during quieter hours, providing a critical evening transport connection and also enabling existing commuter routes during the morning peak to be retained.
- 4.19 To achieve this we believe that bus routes and numbers in central London should be significantly reduced rather than redirected onto neighbouring streets.
- 4.20 We also believe that bus stops should be located on certain of the north-south routes close to Oxford Street to enable visitors and employees to use buses at a range of points rather than just at the ends of Oxford Street (i.e. Tottenham Court Road and Marble Arch).

Cycling

- 4.21 The consultation paper states that Oxford Street is currently used by very few cyclists. We believe that, for the safety and comfort of pedestrians, cycling should not be encouraged on traffic-free areas by creating special facilities (e.g. cycle lanes).
- 4.22 However, there should be provision for cyclists to visit the West End by providing facilities such as cycle racks in proximity to nearby alternative routes.

Pedicabs

- 4.23 New West End Company has long supported WCC's opposition to unlicensed pedicabs on central London streets. We share the council's concerns about the safety of passengers and pedestrians. We do not believe that pedicabs should be allowed to operate on any traffic-free areas.

Taxis

- 4.24 Our preferred traffic-free option would result in taxis crossing Oxford Street on the north-south routes. We do not believe that there should be any vehicular traffic along Oxford Street between 10am and 10 pm.
- 4.25 We believe that taxi ranks should be located on certain north-south routes close to Oxford Street to enable visitors and employees to use taxis at a range of points, rather than just at the ends of Oxford Street (i.e. at Tottenham Court Road and Marble Arch).

Deliveries

- 4.26 Our preferred traffic option would allow for delivery vehicles to access Oxford Street between the hours of 10pm and 10am and also offload from bays on the north-south routes, as well as any current side and rear servicing.

5. GROWTH—LIMITING CHALLENGES

- 5.1 While much of the consultation paper commentary focuses on transport issues, the paper also aims to create proposals that:
- Support future growth and economic activity
 - Support businesses throughout the district, enabling economic growth and creating jobs
 - Provide the commercial accommodation necessary to meet economic and employment growth targets
- 5.2 To realise the full potential of the area and enable it to retain its global position in the face of increasing competition the West End needs to be able to evolve and create the right sort of growth that enhances the district for businesses, visitors and residents. New West End Company believes that the future of the West End depends not just on the transport and public realm improvements discussed in section 4 but also on addressing growth-limiting challenges outlined in section 2.7 above, specifically:
- A shortage of commercial workspace
 - Evolving retail trends and fierce global competition

An ambitious long-term aspiration for the Oxford Street district

- 5.3 New West End Company believes that there should be a clear and ambitious long-term aspiration to ensure that this transformation is not just transport focused but relates to place-making, employment and economic growth, addressing many of the current challenges facing the district. This needs to be a fully co-ordinated and coherent aspiration shared by WCC, the GLA/TfL, LB Camden, businesses, residents and other key stakeholders.
- 5.4 An ambitious and clear aspiration is required to guide the future growth of this part of the West End, maintaining and enhancing its world standing as a leading shopping, entertainment and commercial district whilst maintaining its unique character. The long-term future needs to recognise the potential for

significant growth on Oxford Street and within the wider district to meet WCC's challenging employment and economic growth targets. Specific planning policy is required at the London Plan and Westminster City Plan levels to support this.

- 5.5 The opening of the Elizabeth Line provides a great catalyst for growth. We agree with the words of the Deputy Leader of WCC and the Deputy Mayor for Transport in the overview of the consultation paper that "the introduction of the Elizabeth Line in late 2018 provides a once in a generation opportunity to tackle these challenges and make the district into the world's best outdoor shopping experience and an unrivalled place to live, work and visit." But to realise fully that opportunity we need to articulate that aspiration and provide the enabling environment for it to be delivered by all parties.

A shortage of commercial office space

- 5.6 The Mayor and WCC have set ambitious growth targets for Westminster. In its consultation paper 'Building Height' WCC states that "being at the heart of a world city there is no room for a 'no growth' option". The council continues "we have to find an additional two million square metres of business floorspace to accommodate an additional 77,000 jobs and to make up for the significant amount of office space we have lost to housing since 2005".⁹
- 5.7 The West End Partnership supports this when it says "The Partnership is committed to ensuring that local people and all Londoners are able to see and access the benefits of greater prosperity and better life opportunities that a thriving and growing West End will offer. For example, there is a projected growth in jobs of 77,000 in Westminster by 2036".¹⁰
- 5.8 The West End Partnership's Vision proposes that "more space for employment and expanding businesses will be provided" and adds that "higher levels of economic growth in both the core West End and in its fringes will be matched by the sustainable and balanced creation of new capacity, in terms both of accommodation and city management."¹¹ The Partnership notes "Its (the West End's) property stock faces a near-zero void rate soon, creating a shortage of commercial space for a huge number of small and medium sized firms that have traditionally started life here".¹²
- 5.9 The West End Partnership's Vision 2030 further stresses the need for additional commercial space saying "It is estimated that Westminster will need to host thousands of new jobs every year over the next 20 years just to maintain its share of London's employment market, given the forecast growth in population...The necessary growth in floor space to meet these jobs targets will be required over the next 20 years...Changes to the West End's density, massing and form will have to be considered, on the basis that the interests of both residents and the needs of businesses can be met. It must enhance the West End, not detract from

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9 Building Height: getting the right kind of growth for Westminster (WCC, 2017)

10 The West End Partnership. Vision 2030

11 The West End Partnership. Vision 2030, page 12

12 The Case for the West End, August 2016, page 4

it”.¹³

- 5.10 New West End Company commissioned research from Volterra and Gerald Eve to determine the amount of new commercial floorspace required to accommodate an additional 30,000 new jobs in Oxford Street over 15 years as the district’s contribution to the West End Partnership’s jobs growth targets. Three different floorspace scenarios were considered dependent on how these additional jobs are delivered and how much new floorspace is required to deliver them. The results show that up to 750,000 sqm of new office space could be required to meet these job creation targets. The full study is available from New West End Company.
- 5.11 The report also showed that WCC and The Mayor could accrue planning payments of up to £206 million over that 15 year period and additional business rate income of up to £160 million annually if permission to deliver the maximum commercial space required to meet its job targets was granted.
- 5.12 Gerald Eve was also asked to examine major development schemes across the Oxford Street either being determined, permitted or under construction (but not yet occupied), as a sample of the historic pipeline, to consider the extent to which they could have contributed to meeting these employment targets. The full study is available from New West End Company.
- 5.13 The study looked at these schemes in terms of the floorspace uplift and contribution towards policy objectives in terms of jobs, homes and CIL/business rates. They then undertook a separate assessment based upon a more positive policy framework in terms of both building and employment growth and more flexible mixed-use policies for the district. The schemes considered, and the additional volume applied, are set out at Appendix A of the study.
- 5.14 This sample confirms that a reasonably modest increase in these existing schemes alone would have delivered around 84,000sqm GEA of additional office floor area. This would have supplied over 10% of the new floorspace that may be needed over the next 15 years. This space could have accommodated around 8,000 new jobs, potentially adding up to £600m to the City of Westminster’s annual GVA.
- 5.15 This sample would have, additionally, contributed £16.5m to Westminster’s CIL receipts and a further £11.7m of Mayoral CIL / Crossrail payments. Gerald Eve’s ratings analysis suggests this more ambitious approach to the sample of schemes reviewed could have secured an additional business rates take of £480m over a 20 year period.
- 5.16 The West End clearly needs additional commercial space to be created and there would be great economic and financial benefits to both businesses and the public sector in providing it. To meet the challenge of providing sufficient new commercial accommodation New West End Company believes that WCC should:
- Continue with the current mixed use policy to enable the maximum area of

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13 The West End Partnership. Vision 2030, page 12

new commercial space to be created on Oxford Street without having to provide a housing element

- Relax the restrictions on the height of development in the CAZ. WCC is currently consulting upon appropriate locations for bigger and higher buildings and roof level extensions to meet growth targets. The Oxford Street district is ideally located for bigger and higher buildings given the exceptional public transport accessibility, scale of existing buildings and streets and significant potential for place-making.
- Consider other changes to local planning policy, such as rights of light, which would facilitate greater commercial development

5.17 Without these policy considerations we do not believe that WCC will be able to meet its jobs growth targets, to the detriment of the economy and future business rate income for the council.

Evolving retail trends and fierce global competition

5.18 The West End needs to evolve constantly to lead and respond to changing retail trends driven both by online retailing and by national and global competitors. This will require greater flexibility and more imaginative uses and attractions to continue to appeal to visitors and investors. New West End Company has identified a range of policy areas where change is necessary to enable the West End to retain its global position. These are outlined below.

5.18.1 Encourage a broader range of uses including leisure, culture and civic amenities

The Oxford Street district is currently largely dominated by retail with office uses above ground level. In accordance with best practice from other world leading cities and retail centres, there needs to be a broader range of leisure, cultural and civic uses which will improve the wider offer within the International Centre. We need to enhance the West End's identity and attraction to a wide range of visitors and increase the dwell times within the district, including during the evening. Such uses would be expected within an International Centre given the number of visitors, and they are critical to realise fully the area's potential during the day and evening, especially given its exceptional public transport accessibility. WCC's current strict retail policies need to be suitably amended to enable Oxford Street to evolve in ways that appeal to modern-day shoppers.

5.18.2 Expand the boundaries of the International Shopping Centre and West End Special Retail Policy Area

There is clear potential to expand the boundaries of the International Shopping Centre and WESRPA to surrounding streets reflecting the significantly enhanced pedestrian movements after the opening of the Elizabeth Line. These nearby streets will play a key role in enhancing the overall function of the Oxford Street district. They can help to provide the mix of uses needed to transform Oxford Street into a modern retail district. Indeed, with some entrances/exits to the Elizabeth Line stations being one block back from Oxford Street, these streets will automatically

acquire a new role, character and set of movement patterns and certain of them, such as Harewood Place, could also be made traffic-free.

5.18.3 Promote the evening economy of the Oxford Street district

The evening economy across the district is currently limited and Oxford Street itself is largely inactive once the major retailers close. There is the potential for significant enhancement of the evening economy in the district and along Oxford Street in particular (as it is relatively unconstrained by local residential uses). These will have a major beneficial impact upon retail trade in the evening and as part of the supporting offer of the district.

5.18.4 Develop and promote a cultural strategy

Similarly, a cultural strategy for the Oxford Street district is required to add to the wider attractiveness of the district, particularly in developing and promoting the evening economy.

5.18.5 Prepare planning and design guidance that will help deliver the long-term aspiration

In contrast to the defined Opportunity Areas, there is very limited specific planning policy for the Oxford Street district.

Given the scope for growth, place-making and district-wide collaboration, there should be explicit positive policy support by both WCC and the Greater London Authority.

In addition WCC-led planning and design guidance should reflect the aspiration for the district and provide a specific focus upon the identified urban zones and key sites to ensure that the principles are incorporated into new development proposals.

5.19 New West End Company believes that these policy measures would allow and encourage the Oxford Street district to grow in the right way to maintain its global position.

Q3 “We have described how we might improve the look and feel of Oxford Street, and other streets in the district, in both the short and long terms. If you have any comments about this aspect of our proposals, or any aspiration for the look or feel of Oxford Street you would like us to consider, please consider them below.”

6. OTHER ISSUES

Public realm

6.1 Any moves to create traffic-free blocks on Oxford Street will require significant public realm works. The West End is a world class shopping and commercial destination and all public realm works should be of a quality that reflects this. Work undertaken by The Crown Estate on Regent Street and works recently commenced on Bond Street should set the standard for public realm quality in the West End.

- 6.2 We share the view articulated in the consultation paper that there is too much unnecessary street furniture on Oxford Street. Our business study states: “While some objects serve a clear purpose, their placement is in many cases problematic. Some of these objects create visual and physical obstructions, particularly at pedestrianised junctions with connecting streets, dissuading people from turning off Oxford Street and exploring the wider area. Objects such as kiosks and telephone boxes frequently obscure wayfinding aides such as Legible London. There are also a number of objects, including telephone boxes, that primarily attract antisocial behaviour rather than providing any amenity value.”¹⁴ We support the removal of unnecessary street furniture throughout the Oxford Street district.
- 6.3 In section 5.18.5 we call for planning and design guidelines to ensure a consistent style and quality of public realm throughout the Oxford Street district.
- 6.4 If our preferred traffic-free option was adopted we suggest that removable bollards be used to prevent traffic access between 10am and 10pm. These would have the additional bonus of providing security to protect shoppers from rogue vehicles.

Management

- 6.5 The West End currently suffers from a series of street management issues that detract from its status as a world class shopping district. Begging, busking, rough sleeping, crime and lack of cleanliness are all major issues in the West End. New West End Company’s discussion paper, ‘World Class Street Management for a World Class City’, lists 22 different street management areas and compares the current state of the West End with world class standards. In most of the 22 areas the West End falls below these standards.
- 6.6 We need to ensure that the management of a traffic-free Oxford Street, with the new challenges it will bring, is properly examined and planned for. We believe that there should be a robust street management plan in place, agreed by all parties and sufficiently funded, before any traffic-free measures are introduced.
- 6.7 A management plan will require strict enforcement. We believe that the council and the police should work in partnership with New West End Company and private companies in the West End to ensure the enforcement of world-class standards.

7. CONCLUSIONS AND SUMMARY OF RECOMMENDATIONS

- 7.1 New West End Company fully supports WCC and TfL in their desire to seize the once-in-a-generation opportunity provided by the opening of the Elizabeth Line to plan for the transformation of the Oxford Street district.
- 7.2 New West End Company recommends that WCC and TfL should:
- a) Have an ambitious long term aspiration for the Oxford Street district which:
 - Ensures that this transformation is not just transport focused

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- Relates also to place-making, employment and economic growth
- Addresses the current challenges facing the district

b) Address the wellbeing challenges of the district by:

- Reducing significantly the number of vehicles in the West End, particularly buses, by reducing routes rather than redirecting them locally
- Improving air quality through traffic reduction, removing the worst polluting vehicles and establishing the Ultra Low Emissions Zone in time for the opening of the Elizabeth Line
- Creating traffic-free blocks on Oxford Street, between the hours of 10am and 10 pm, by retaining the north-south routes
- Using certain north-south routes for bus, taxi and deliveries
- Removing street clutter and creating a high-quality public realm

c) Address growth-limiting challenges of the district by:

- Promoting greater intensification of use by continuing the current mixed-use policy, relaxing restrictions on the height of developments and considering other planning policy changes to provide the commercial space needed to meet job growth targets
- Encouraging a broader range of uses including leisure, culture and civic amenities
- Expanding the boundaries of the International Shopping Centre and West End Special Retail Policy Area into surrounding streets
- Promoting the evening economy
- Developing and promoting a cultural strategy
- Preparing planning and design guidance that will help deliver the long term vision

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June 2017

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