

The St Marylebone Society

Comments on The Proposed Transformation of Oxford Street

TfL Consultation 6th November 2017 - 3rd January 2018

We are Marylebone's oldest amenity society, having been set up in 1948 to help save the war-damaged Nash Terraces in Regent's Park. We are a statutory consultancy body, and our members are residents and businesses (who live or work in what was the old borough of St Marylebone extending to St Johns Wood in the north and Oxford Street in the south). Our statutory planning consultancy for Westminster City Council is the area North of the Marylebone Road so outside the current Congestion Zone and proposed ULEZ, and for us, the most pressing issues are very serious levels of pollution and congestion. Oxford Street is very local and important to us and changes to its operation may adversely affect our members.

OXFORD STREET

For the last few years, buses have killed typically one pedestrian every year in overcrowded Oxford Street, and the new Elizabeth Line is likely to deliver many more pedestrians, and to have a significant effect on transport and movement patterns in the area. We recognise that doing nothing in Oxford Street is not an option.

But is pedestrianisation workable without deleterious effects on nearby streets and the areas at the Eastern and Western ends which will now have to accommodate the many bus turnarounds? We share the concerns of other stakeholders, including residents, the Great Estates, and the local BIDs.

Our main concerns are:

LACK OF AN OVERALL PLAN FOR THE WHOLE OF OXFORD STREET

We are concerned about the unusual planning approach used by the Council and TfL in which *'current proposals for Oxford Street West do not rely on a particular set of proposals for Oxford Street East, and likewise the potential proposals for Oxford Street East will not rely upon particular arrangements in the West'*.

This ignores the maxim 'Think big, build small'. There may be solutions for unresolved issues in Oxford Street West (e.g. access for people with limited mobility) that would be suboptimal for that small section but optimal when scaled up to the whole of Oxford Street from Marble Arch to Tottenham Court Road and even beyond. As well as the risk that wrong choices will be made by designing such an extensive project a few blocks at a time, a whole-street master plan may show that some of the inconvenience to residents would only last for twelve months until subsequent transformation stages cause a radical reduction in motor traffic throughout the West End. Alternatively, they may become worse after that time. Either way, the residents need to know.

TRAFFIC DISPLACEMENT and POLLUTION

We have looked at the traffic modelling, which shows some displacement of traffic to other streets such as Wigmore Street.

We note that there also likely to be displacement of vehicles to major routes such as the Marylebone Road. Modelling & traffic mitigation should cover Marylebone Road, now more polluted than Oxford Street since the reduction in dirty buses there. Zero-emission taxis (starting next month) will soon bring Oxford Street within legal limits.

We are concerned that the map of Traffic Reassignment Impact Areas at

[http://tfl.maps.arcgis.com/apps/webappviewer/index.html?](http://tfl.maps.arcgis.com/apps/webappviewer/index.html?id=91e8c12b384e461da8735025813b828a)

[id=91e8c12b384e461da8735025813b828a](http://tfl.maps.arcgis.com/apps/webappviewer/index.html?id=91e8c12b384e461da8735025813b828a) does not cover the Marylebone Road. We would like to see Marylebone Road traffic modelled under 'Future Base', 'Do Something' and 'Future Base to Do Something', as with other streets in the area.

Like the New West End Company, we want to **"significantly reduce the volume of traffic in the West End – reduction not redirection"**. The very urgent need to restrict overall numbers of hire cars and private vehicles in Central London, as well as dealing with current delivery systems all of which add to congestion throughout the area, must be

tackled. This will mean road pricing. If this needs to be done at National level, then TfL, the Mayor, WCC and local stakeholders should be lobbying for this now.

For those of us who are local but just outside the ULEZ and Congestion Zone, displacement of existing traffic to its boundaries will add further to our very serious problems with pollution and congestion.

We need more incentives for quieter electric delivery vehicles etc., and more penalties for polluting vehicles sooner. Officialdom has long been aware of the public health issues in Central London and successive regimes have done little or nothing. We cannot wait any longer.

PUBLIC REALM IMPROVEMENTS and FUNDING

The consultation includes a number of Arcadian visualisations of the transformed street. It does not include details of immediate and long-term funding for this vision. This section of Oxford Street will become a linear public space, with all the human behaviours that go along with that function.

- We want to see some evidence that the public realm will actually be improved, and not just the ongoing improvement of Underground stations.
- Are there funds for management and enforcement of the new arrangement? This will require policing. How will night time activities be managed in the area? New West End Company wants to see an extension of current Oxford Street activities into the evening hours and more kinds of activities. (<https://newwestend.com/oxford-street-vision/>) This will mean more nightlife and more pressure on the nearby residential streets.

It is imperative that WCC and New West End develop a detailed planning brief which sets out what they want to see operating in the area if it is different from present uses, and how this will be managed and enforced so that noise and nuisance does not spill into the whole district.

- There is already a need for more public toilets, and the operation and management of these must be guaranteed. The current problem with individuals urinating in side streets will only increase, and the change of character envisaged by the BID in a pedestrianised Oxford St zone at night will exacerbate the problem.
- Disabled access provision: there is a lack of any proposed replacement measures after the removal of buses, apart from providing more seats along the pedestrian zone between (accessible) stations. Is there funding for these, and is this enough?

CONCLUSION

The Transformation of Oxford Street must work for everyone. Local residents and businesses nearby are not simply *there* - they make a large positive contribution to the character and functioning of the whole area, and their wellbeing is as important as that of visitors and shoppers. A successful first phase will be essential if the wider transformation is to go ahead.



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