

Freepost TfL Consultations

3rd January 2018

Our ref: BOS/consultation response/update

Dear Sir/Madam,

CONSULTATION RESPONSE - ON OXFORD STREET WEST TRANSFORMATION SCHEME

Thank you for the opportunity to comment on your proposals for the transformation of Oxford Street West.

Better Oxford Street (BOS) is a not-for-profit organisation formed and supported by all of the West End's recognised amenity groups, including the Marylebone Association, the Harrowby and District Residents Association, the Soho Society, the Fitzrovia Neighbourhood Association, the Residents' Society of Mayfair and St James, the Mayfair Residents Group, the Charlotte Street Association and the Hyde Park Estate Residents Association.

We are unable to support the current proposals for the transformation of Oxford Street for the reasons given below.

Please note that our response does not go into street-by-street detail on the impacts of these proposals, this has been ably dealt with by the individual amenity society responses for their areas. That is: Mayfair; Marylebone; Soho; and Fitzrovia, and the areas to the west and north that will be affected: Bayswater; Hyde Park Estate; Paddington and Maida Vale; responding under the combined umbrella organisation of Paddington Residents Active Concern on Transport. To the east, the Seven Dials Trust; the Bloomsbury Association; the Leicester Square Association; and the Covent Garden Community Association, are also filing their own replies and have all seen and are all in support of this response.

The BOS response concerns itself with the more general issues arising from the transformation proposals, of which there are many, and the consultation process, and it also looks at some possible alternatives to closing Oxford Street to all traffic and could form the basis of a revised plan that would truly benefit the whole area, not just Oxford Street.

Section A lists all those broad headings where concerns arise to a greater or lesser extent amongst all the Westminster groups; Section B questions certain assumptions within the consultation; Section C highlights and questions certain statements made in documents linked with the consultation;

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Section D looks at how the results of the previous consultation were publicised; Section E questions exactly what “improvements to the surrounding areas” have actually been promised; Section F lists alternatives to closure of Oxford Street that would satisfy the “doing nothing is not an option” assertion without incurring the damage to the surrounding areas that the present proposals would inflict.

Section A.

SUMMARY OF ISSUES OF CONCERN WITH THE TRANSFORMATION PROPOSALS

We would endorse and support the Issues of Concern submitted by Westminster Amenity Society Forum members on the 7th December 2017 recited and expanded on below:

1. Displacement of existing Oxford Street Traffic to local areas

All the existing traffic: buses; taxis; delivery vehicles; lorries; vans; and private hire vehicles (they can presently travel legally down Oxford Street after 7.00pm), and pedicabs, would be rerouted around a closed Oxford Street. The result will be increased pollution, noise and congestion, not only in the surrounding local streets but on all the major routes: Park Lane, Marble Arch, Edgware Road, Marylebone Road and beyond.

2. Lack of traffic mitigation in the present proposals

With the exception of a reduction/relocation of bus routes **we are not aware of any proposals to reduce any of the traffic** mentioned above that will be displaced by closing Oxford Street. It will all be left to find its own way through the surrounding areas, with large residential populations, many of them elderly; schools many of them primary; nurseries; acute hospitals and numerous clinics and other medical practices; colleges, and other institutions.

3. Significant damage to surrounding areas

This will occur not only from vastly increased volumes of displaced through traffic but also from turning the side streets into servicing areas for Oxford Street: taxi ranks; loading; unloading; new bus stands, rubbish collection, resulting in resident and business disturbance, noise and pollution. In addition, we will have new bus routes through residential areas 24-hours per day, bus stops, and new stands for other 24-hour routes to be located in these areas. This will mean certain parts of Marylebone will be subjected to up to fifty buses an hour, even on the present proposals and Cavendish Square will become little more than a bus and taxi depot.

4. Loss of Accessibility

To, from and through Oxford Street from the loss, dismemberment and displacement of nine active bus routes. At Marble Arch four bus routes will be diverted from the Oxford Street area requiring a difficult and awkward change to the one remaining westbound route that will be left there. This will affect primarily, but not only, the old, the young, those with young children, the disabled, those on lower incomes, those working in Oxford Street, those shopping in Oxford Street and all those who dislike travelling underground. All these groups will face a walk of 200 to 400 metres to get to a bus stop, and be faced with a further change of buses when before there would have been one route. Their problems will not end when they arrive at Oxford Street, as the only way to travel down it will be to walk. It is likely that in the face of this, many bus users, particularly the elderly and disabled, will choose to shop elsewhere. Also there will be a loss of accessibility to cyclists, they will be

banned from Oxford Street, Wigmore Street will have been made too dangerous and unpleasant to use, and there will be no suitable alternative routes on offer. Accessibility by taxi also will be heavily compromised, deterring also the higher spending demographic from coming into the area.

5. Public Realm

The proposals as presented claim to be concerned with transforming an entire area but in reality are narrowly focused on one street, in fact less than half of one street at present. They show no big vision for the area, either through a joined-up pedestrian strategy for the West End or a wider urban plan. They give preference to the commercial needs of a core central street and its transient population rather than the wider established residential and business hinterland, which is subordinated to the pedestrianisation master plan.

6. Enforcement and Public Safety

There will be a variety of consequences arising from, or intensified by pedestrianisation, including, but not limited to: crime, illegal street performing, trading, begging, pavement artists, amplified busking, etc. There will be a consequent increase in noise and disturbance to residents in surrounding streets from all this. A long open pedestrianised area will bring with it major public security issues. The ability of the emergency services to move along Oxford Street covered in tents, play areas, seating and whatever else, will be severely compromised. Unsightly bollards will be constructed at every road junction, to deter terrorist attacks (HVM's), but they will need to be movable for access.

We have even greater concerns for the street at night, as it would need to be heavily patrolled to deter drunks, roaming gangs, street soiling, dealers, noise, disturbance, etc. This is largely self-governing at present where a constant flow of traffic gives access and visibility that, whilst not eliminating these problems, at least keeps them under control.

7. Change of use

With pedestrianisation will come the proliferation of new alcohol licences, and late night extensions to those existing, both on Oxford Street, and the immediate surrounding areas, where many residents live. There will be a major extension of the late night economy, indeed that is the way business will be encouraged to invest in street closure. During the day it has been proposed that business can benefit by utilising the closed street meant for the use of pedestrians, by the erection of temporary type structures for the purpose of street al fresco dining and vending.

What is apparent from the consultation documents is that the side streets will become servicing areas for a pedestrianised Oxford Street, where all the vans and lorries will need to offload their deliveries, where all the taxis will need to ply their trade, where the new taxi stands will be placed, and the bus stands, with the buses, and where all the shops' rubbish will need to be left for collection. Meanwhile Wigmore Street would be in great danger of becoming the new Oxford Shopping Street, as that is where the buses will be and the one place in the area people can readily access. It is therefore likely that, once Oxford Street is closed TfL will find the need to add more bus routes to the two already proposed on Wigmore Street and their frequency increased, further transforming the area. There will be nothing to stop TfL from doing this, as well as increasing the frequency of those already there.

8. Practicality

Even without all the other problems listed above the closure would require far more time to implement successfully. The present programme is too rapid, in breach of the Mayor's own promise on gradual implementation, with no time to assimilate. Also the timing is little short of disastrous with a number of major road schemes, already in progress, and it threatens to compromise them:

Baker Street Two-Way

Tottenham Court Road Closure to all traffic except buses and cyclists and reversion to Two-Way on Gower Street (i.e., impact of the Camden's West End Project needs to be assessed).

High Speed 2 works

Cycle Super Highway 11

Cycle Quietways.

Further, a one-hundred-year old tried and tested bus network is to be dismembered virtually overnight, with no proper consultation, and no proper time to bed in these changes. There is, in addition, a huge amount of building work already going on in the very areas of Mayfair and Marylebone where all the traffic will be heading under these proposals.

9. Funding, cost of maintenance and enforcement

There is no funding for the second stage, which is meant to address improvements to public realm in the surrounding areas, other than the strictly necessary changes directly linked to the scheme. Further, closing the road is one thing, but it also creates a major management headache and liability. Who is going to pay for this after the initial period, on a year-to-year basis, in perpetuity? Businesses do not want to pay, the Mayor says he won't pay, and Westminster cannot afford it. Why has no long-term appraisal of ongoing financial costs of this project been carried out? Further, there is no legal agreement yet in place to apportion agreed contributions from the various bodies and stakeholders.

10. Consultation, publicity

There appears to be a widespread lack of general awareness of this consultation in the area that is to be transformed, in spite of TfL/WCC flyers, emails, radio adverts, etc. Our members have found that most residents and businesses, even in the areas that will be directly affected, who were approached about transformation had no idea what it is and were usually horrified when they found out. The lack of effective publicity was further demonstrated by the extremely low figures attending the Road Shows. In addition heavy emphasis on online information and responses meant a major lack of penetration to the elderly demographic, many of whom tend to be bus users and with poor mobility and will be one of the groups most severely affected. There was considerable criticism after the first consultation that the Road Shows were placed in positions that almost guaranteed a low turnout, that they were hard to find, inaccessible for many, and badly signposted, if at all. In spite of this the second consultation repeated exactly the same errors, and changed nothing. This was also in spite of the WCC Leader's assurance to the whole Westminster Amenity Society Forum group at a meeting during the early stages of the consultation that this would be looked into as a matter of urgency and improved.

11. Consultation, area consulted

The consultation was open to all to participate throughout England and even Scotland. This allowed groups with an ideological proclivity towards pedestrianisation to encourage all their members to participate, many of them with absolutely no links, care for, or understanding of the area.

12. Consultation, time allowed

The initial 6-week period was clearly insufficient for such a complex undertaking and was insufficient to increase public, business and resident awareness to an adequate level. As has been pointed out by the London Assembly these proposals would represent one of the most significant changes to London's public realm for a generation, with wide-ranging implications for traffic movements, residents and visitors, and businesses across the West End. The two-week extension subsequently granted was welcome but, spanning, as it did the Christmas period, made little difference.

Section B.

SOME PROBLEMS WITH THE CONSULTATION

Aside from the lack of time allowed, we are being asked to consent to a series of proposals without sufficient information on some key points and with some very questionable information on others:

1. Insufficient information about the whole scheme

The transformation scheme, is a scheme to pedestrianise the whole of Oxford Street. However the consultations are piecemeal, dividing Oxford Street up in to 3 areas, of which this is only the first one. So each one is to be looked at in isolation meaning solutions can only be looked at in the context of the area being consulted on at the time, encouraging solutions that may favour one area to the disadvantage of an adjoining one. Further the consultation is narrow in its brief for the individual areas, retail driven and focused on perceived benefit to Oxford Street, concerned with the surrounding areas only in so much as how they can be used to meet the needs of a pedestrianised Oxford Street. E.g. how can Wigmore Street best serve Oxford Street with buses? Not, would it be to the advantage of that area to have buses put through it?

2. How will 45% of shops with no rear access be serviced?

A major objection to the closure of Oxford Street to vehicles during the day, never mind for 24 hours, is the considerable disruption that would result to the neighbouring side streets, in effect turning them into servicing depots for Oxford Street. WCC/TfL have constantly countered this argument by claiming, both in the consultation, and before, that relatively few buildings are presently serviced from Oxford Street. This does not appear to be borne out by the survey figures of Oxford Street shops we have seen from TfL/WCC which show over 35% presently have no rear or side access. (Schedule 1)

We also refer to the survey carried out by BOS, between 18th and 21st December 2018, which revealed that around 45% of shops have no alternative but to be serviced from Oxford Street. (Schedule 2)

These figures pose a definite challenge to the frequent statements made concerning servicing accessibility, which is fundamental to the viability of the project and needs to be addressed.

3. How accurate is the traffic modelling?

“Despite the sophistication of our traffic models, all traffic modelling is only ever indicative; it is intended to give an idea of where the impacts of changes in journey choice are most likely to be felt”
WCC/TfL booklet: Traffic impacts on the transformation of Oxford Street.

Unfortunately in spite of the relatively modest claim above, traffic modelling is being heavily relied on for the figures, projections and maps to be found in the consultation; yet it is only a computerised simulation of the possible effects, it is entirely reliant on the information fed into it and its ability to accurately project this. If any data are left out the projection will be incorrect; however for the purposes of the consultation the figures are treated as authoritative and not open to question.

There are good reasons why the accuracy of the modelling should be questioned; because it has been wrong before. Average road speeds, after the introduction of the Congestion Charge have fallen from 10.9mph in 2003, to around 8.0mph today. At the same time the volume of traffic has fallen by around 20%. This has been achieved by a co-ordinated removal of a significant amount of road space over this time, for cycle highway schemes and the like. The traffic modelling involved in these schemes appears consistently to fail to predict the resulting congestion. (e.g. Upper Thames Street Eastbound PM: 13 minutes was the model prediction after superhighway works; actual time now taken: 25-30 minutes-on TfL figures). DEFRA were also found by the High Court to be using over optimistic traffic modelling data last year in a high profile case bought against the government, and won by Client Earth. There is obviously a large margin of error with all this modelling and it is obviously tempting to err on the “optimistic” side when projecting future traffic numbers.

So there has been a tendency to introduce schemes that reduce road capacity, with modelling that shows it will not affect overall traffic flow. By the time those consulted find out that the modelling was wrong, it is too late. We fear that the present consultation is being conducted along the same lines.

Similar questions can be raised with the air pollution modelling as it is primarily based on what the traffic modelling shows, the rest is extrapolated from the two monitoring stations in the area, one on Oxford Street and one on Marylebone Road with some additional data from Heathrow. There is a wide margin of error in all of these which combined with the margin of error on the traffic modelling means that these figures too cannot be relied to be an accurate future forecast.

4. How does moving all the traffic off Oxford Street not go through the surrounding areas?

Only by relying on the TfL/WCC modelling does it not go through the surrounding areas, and as we have seen above, this is not very reliable. In the real world it does tend to, for the simple reason it has nowhere else to go. Only by a holistic scheme for overall traffic reduction, not just buses, in the whole area would we see any genuine benefits from transformation. Only by the design of a “low traffic neighbourhood” with real restrictions on traffic going into it would this scheme stand any chance of success. There has been no attempt however to do this.

5. Where are the alternative routes?

The loss of diversionary capacity is nowhere mentioned or otherwise contemplated in the consultation. At present the network just about copes when everything runs smoothly. A gas leak or any event involving temporary closure of Oxford Street brings chaos and near gridlock to the surrounding areas. That is with the back-up of Wigmore Street. What will happen under transformation with Oxford Street removed and the network permanently at full capacity if Wigmore Street is then closed? And it does frequently close: On Westminster’s own figures since 2014 Wigmore Street has had 19 official applications for part road closures, 7 of these have been for substantial periods, between 2 days and 14 days.

Equally how will the remaining road network cope when we have Regent Street closures, marches and other events in Central London? It is not a question of if, but when, these events will occur, yet no provision has been made for this. Where will the traffic go? This is a question we asked TfL six months ago, but there is no answer we can find in the consultation, probably because there will be nowhere else left to divert all the traffic to.

6. How much footfall from the Elizabeth Line?

Pedestrianisation is due to tie in with the arrival of the Elizabeth Line (Crossrail), which is expected to bring a surge in passengers and visitors to Oxford Street. This is perhaps the strongest argument for pedestrianisation. However there has been no evidence anywhere in the consultation submitted to back up this conclusion. We are therefore expected to take this at face value, based on an out-of-date assessment carried out by TfL, itself little more than guesswork, which came up with a projected 30% increase in numbers once the whole line was fully operational. Leaving aside the fact that it will not be fully operational until a year after it opens in late 2018, it is not clear that there will be any immediate significant increase in numbers coming into Central London; there will be no extra jobs initially and shoppers may just as likely choose to use it to get to a more convenient shopping centre, such as Stratford. We are simply expected to accept this assumption of an approximately 30% increase in footfall. The Crossrail effect is constantly cited as the major driver for pedestrianisation, yet considering that the projected increase in numbers cannot be tested in any way, this is another major problem with the consultation.

7. Where is the Management Plan?

Other than what the scheme would do to the surrounding areas, how will it actually fare within the area it is aims to improve, in Oxford Street itself? It has been admitted by WCC and TfL that an effective Management Plan (being presently worked on and called a Management, Maintenance, Activation and Funding Plan-MMAF) is key as to whether the running of a pedestrianised Oxford Street would work properly, or at all. It would be needed to ensure, amongst much else, that noise, anti-social and criminal behaviour are controlled and that deliveries and waste collections take place at civilised hours so that residents can be confident of being able to sleep. All of these factors are fundamental and extremely difficult to reconcile with closure. However, perhaps for that reason, such a plan is a long way off development, never mind publication. This apparently is the one part of the scheme where there is thought to be no particular rush, as we are informed it will not be available until 2022. Until then we understand that there will be a sort of interim, evolving, document, but there is no sight of even that yet. So much that cannot be readily answered comes back to a plan that does not presently exist. This is therefore essential to the consultation, yet there is no document available, or even a preliminary draft of it, for us to make a judgment on.

8. Who is paying- and what for?

Oxford Street is a Westminster road, once it has "transitioned" it will be a Westminster liability. There is, so far as we have been told, no funding agreed for the second stage, which is meant to address improvements to public realm in the surrounding area, other than the strictly necessary changes directly linked to the scheme. We are told Westminster Council is still "exploring with the Government how longer-term improvements for Oxford Street could be funded" But should this not be done prior to racing into the first stage? Just in case the money turns out not to be available?

So far then central government has shown no interest in funding the second stage and the Mayor has stated that he will not. Business is unwilling and already suffering under the significant recent

rate increases, the rise of online shopping, the uncertainty with Brexit, and the loss of footfall to more easily accessible shopping centres; it will not willingly contribute to anything that does not produce an obvious return on capital. But under the MMAF, it will apparently be expected to. But any money from business alone will not be sufficient and business will obviously only be contributing if it sees substantial trading concessions that can justify its contributions. The funding is very relevant to the present consultation decision as this need for contributions could open the way to a rather different form of pedestrianisation than we are led to believe from the artists impressions supplied. One where there will be a considerable amount of trading and “alfresco dining” on the pedestrianised street, to help pay for it.

No matter what the contributions the ultimate liability will be Westminster Council’s. It will therefore be taking on a very expensive long term funding obligation at a time of extensive and far-reaching budget cuts, and at a time when Westminster’s councillors can identify many more pressing claims.

9. Bus numbers

Projected bus numbers: approximately 18 buses per hour from the 2 diverted routes are mentioned for Marylebone but these are merely projections. What is there to stop TfL increasing the number of buses, and bus routes, and bus stands? Once Oxford Street is closed and it is discovered that the present projected minimal services are insufficient, especially at peak travel time of the year there will be pressure to do so. Indeed even before the scheme has been approved there are already calls for increasing the numbers of buses and bus stops from a number of groups. This is in addition to the 50 or so other buses an hour that will be using the area, running to and from stands. Wigmore Street, once it has been opened to buses, will be in great danger of becoming the bus and servicing lane to Oxford Street.

10. Policing issues

The consultation document does not explain what will happen in Oxford Street once the shops are closed and through the night. With so much empty space, accessed by numerous alleyways, it has the potential to turn into a haven for begging, rough sleeping and various anti-social activities. It could well become a pedestrianised area where people fear to walk. An Oxford Street empty of vehicles would require significant levels of police enforcement and activity, this at a time when the police presence in the West End as a whole has been dramatically reduced. Would police numbers be increased? If so would this be on a permanent basis? How would this be guaranteed and ring fenced from future cuts? What guarantees would there be that this would not be at the expense of the surrounding areas? Again without a Management Plan, there are no answers to these questions.

Then there is the whole issue of public safety and the unfortunate fact that a high profile pedestrianised street full of people would become a prime target for terrorist attacks, particularly from hostile vehicles. The consultation document admits that mitigation measures (HVM’s) would be necessary. But once again it is short on the details. There are many concerns around the visual and spatial impacts of HVM measures, specifically their design and locations. Also the consultation is silent on how authorised vehicles (e.g., emergency services) could gain access through the HVM lines and through the variety of street furniture and impedimenta that will be clogging the pedestrianised street.

11. Requirements for Environment Statements

Strategic Environment Assessment (SEA) Directive 2001/42/EC on the assessment of the effects of certain traffic plans and programmes on the environment, and/or Environment Impact Statement 2014/52/EU could be relevant to the consultation plans. Will there be an environmental assessment commissioned to deal with the specific effects of Oxford Street closure?

12. Transformation or pedestrianisation?

Finally, we have found it particularly unhelpful, and indeed misleading, to have had a consultation which does not even dare say in plain English what it wants to do. The purpose of this consultation is to bring forward plans to pedestrianise Oxford Street West. All the other proposals are secondary to this and designed to try and accommodate the needs of the area to this overarching aim. Yet nowhere in the consultation is that plainly and clearly stated; in fact it seeks to hide the end objective behind obscure terminology and it is presented in a way that purports to “improve” the whole area, the “prevention” of traffic is somehow being incidental to this.

Whereas this contrivance serves merely to annoy those local to the area, who fully realise the implications of closing the main road running through it, it is very misleading to those who do not, who may well be left with the impression that “transforming” Oxford Street will do nothing less than bestow a host of improvements on the surrounding district. The introductory letter to the consultation, which will be as far as many people get before answering it, does not even mention the fact that Oxford Street will be closed to traffic, merely that it will be “easier to walk through”. Why if pedestrianisation is such a good idea cannot the consultation even bring itself to use the term?

Section C

SOME CONSULTATION STATEMENTS THAT ARE DISPUTED

Most people will be taking the information that they read in the consultation documents at face value and will in many cases be deciding whether or not to support the proposals based on that information. It is therefore vital that none of it is misleading or incorrect. However not all statements clear this bar, indeed some statements are actually contradicted by what has been said elsewhere and in a number of cases there is no supporting documentation on some key parts of the consultation, on which we are nevertheless expected to form a view.

1. Accessibility

“We are looking now at what can be done to ensure we improve the experience of using Oxford Street for everyone, while still ensuring that people can travel by bus, taxi or cycle easily and conveniently, and that local people are not disturbed or inconvenienced.”

TFL Consultation Report October 2017

The second part of this sentence is manifestly incorrect. Nine bus routes are to be cut or displaced, taxis will be banned from Oxford Street and cyclists will not be able to use it. It is hard to imagine a scenario of greater disturbance and inconvenience than this. Not everyone wants to or is able to walk everywhere in Central London. Not everyone wants to be forced into the Tube or Crossrail.

2. Traffic displacement

"We are working to ensure that any proposals for the transformation of Oxford Street do not adversely impact the wider district in terms of traffic dispersal."

TfL Consultation Report October 2017

With the exception of reduction of bus numbers, there is no such work that we are aware of to ensure this. And indeed we are then told in the same document; *"that it is not possible to ensure traffic does not re-route through any specific areas"*:

"As a result of any proposed Oxford Street scheme permissible routing through the area will occur on public streets. It is not possible to ensure traffic does not re-route through any specific areas but it is the responsibility of TfL and WCC to ensure that traffic levels are managed as efficiently and effectively as possible."

TfL Consultation Report October 2017

But we are not told this in the actual consultation document, and that is what most people will be reading to help them to decide whether to say Yes to transformation.

3. Air quality

"A key objective for the transformation of Oxford Street and the surrounding area is to improve the environment; to address poor air quality and deliver improved neighbourhoods for residents and support the West End's economy."

TfL Consultation Document November 2017

There is no improvement to air quality from transformation other than in Oxford Street demonstrated anywhere in the consultation documents. The only positive changes on air quality come from wider initiatives on buses, and for example the 'T-Charge' an emissions surcharge to the Congestion Charge, which was introduced on 23 October 2017, and proposed changes to the Ultra Low Emission Zone. It is only by putting these projections into the modelling, which have nothing to do with closing Oxford Street, an improvement to the environment can be claimed. In other words, air quality in the West End will improve only due to these wider initiatives, not due to transformation. But transformation does mean that most of those improvements will be seen in Oxford Street, rather than in the surrounding areas, which even on the optimistic modelling projections given, will be far worse off.

4. Cycling

"The importance of cycling as a healthy and sustainable transport mode is recognised and as the scheme progresses a cycle strategy will be developed which seeks to improve conditions for cyclists through the wider area and to Oxford Street."

TfL October Consultation Report 2017

And a month later:

"Cycling will not be allowed on Oxford Street..... and cyclists will be asked dismount and wheel their bikes through the space"

TfL Consultation Document November 2017

Quite clearly, in spite of the first statement above, more than 2000 cyclists a day will suffer the major inconvenience of being unable to use Oxford Street West. They are yet another group to be disadvantaged by these proposals. This will be even less acceptable to them when they discover that the space that could have been used for a cycle lane will not in fact be just used by pedestrians but be shared by retailers to provide al fresco dining and other entertainments. Further, although the consultation states that plans for alternative cycle routes will be developed, this should have been done as part of the current consultation so responses could have been informed by what was proposed, but it has not been. This was probably felt best left until after the consultation, as the bad news for cyclists is that there are no viable alternatives that run anywhere near Oxford Street.

So as it stands there is nothing in the transformation proposals by way of compensation for cyclists; alternative routes, other than Wigmore Street, will be extremely difficult to find; and it is unlikely that cyclists will want to use Wigmore Street as it will be overcrowded with traffic that cannot use Oxford Street.

5. Wigmore Street

"As a result of these changes we propose to make to Wigmore Street our modelling shows that fewer vehicles will use the Street in future"

TfL Consultation Document November 2017

At first sight, to those reading the consultation papers, this will appear to be good news. But how can this be? The Wigmore Street corridor is destined to take all the remaining Oxford Street buses, and many of its taxis, vans and commercial traffic and pedicabs, this seems therefore to be improbable.

And then in the same document...

"In the morning and evening peak, eastbound traffic on Wigmore Street is predicted to see an increase in journey times of three to four and one to two minutes respectively, between Portman Square and Wimpole Street."

So even on the figures presented here, that is an **increase** of three to four minutes in the morning on a 500 metre journey! In normal traffic conditions the whole journey should not take that long.

The first statement is challenged by the second, unless the idea is to create a long queue of barely moving traffic, as in the Strand, in which case fewer vehicles, will indeed be using Wigmore Street; but it will be far more congested and polluted, and the many displaced vehicles will be using other parts of Marylebone and Mayfair instead. Indeed, looking back at the October TfL Consultation Report, this "reduction in capacity" appears to be just what is proposed:

*"The highway changes proposed on Wigmore Street may lead to some traffic re-routing. The scheme provides improved facilities for pedestrians and cyclists **which in turn reduce capacity. As a result traffic is predicted to take alternative routes to avoid additional delay associated with the reduction in capacity on Wigmore Street.**"* TfL Consultation Report October 2017

But this statement is not in the consultation documentation that people will be reading to help them to decide whether to say Yes to transformation, not many will understand that; *"fewer vehicles will be*

using Wigmore Street," simply because less vehicles will be able to get through it because of the congestion. This material and important statement is therefore misleading.

6. Buses

"In planning changes to buses using Oxford Street we will seek to minimise the loss of direct connections and amenity for passengers and for the frequency of buses which serve the area to match demand."

TfL Consultation Report October 2017

This is perhaps the most difficult of all the consultation's statements to reconcile with the reality of what is actually proposed. London's bus service is the only public transport service that is fully accessible to all and that operates across London on a 24 hour basis. The proposed removal and diversion of so many routes will be extremely disruptive; the following nine daytime bus routes will be removed:

Routes 7, 10, 23, 94, 98, 113, 139, 159 and 390.

Eleven night buses serving Oxford Street West will be removed:

Routes 10, 23, 94, 139, 159, 390, N7, N98, N113, N137 and N207.

This will entail the removal for many, of any option of through bus travel, not only along Oxford Street, but through the West End, without an awkward change of buses. Many of the West End's workforce rely on using buses to give them a cheaper and more direct access to their place of work than the underground. For many of the old and disabled, and the young, buses are their only means of transport. Is not this mass network redesign a guaranteed way to lose passengers and revenue? Or, more accurately, to accelerate the existing loss of passengers and revenue.

For some it is said the solution is to switch to the underground, but even if it is accessible to them and runs to the right place, they will have to pay considerably more than they presently would to travel by bus. For many this will not be an affordable option, or in the case of London's large population of night workers, not even a viable one as the tubes do not run all night for most of the week.

TfL themselves have estimated that these changes, together with the changes made earlier this year will result in the disruption of approximately 63,000 bus journeys every day, and even this figure is probably a major underestimate, for one reason night buses carrying nearly all of London's night workers are excluded.

Therefore contrary to the statement above we submit that many passengers **will be** seriously affected by the loss of bus routes and direct access to, and through, Oxford Street.

In addition, the remaining buses will be rerouted through unsuitable narrow back roads, (to be made even narrower under the transformation pavement widening plans) where with their size and frequent stopping they will compound congestion and pollution problems for these areas. On top of that, as a result of the need to accommodate transformation plans, a large number of existing bus stands for other routes will be moved from their present logical positions located near to where their

routes terminate, over to semi-residential areas in Mayfair and Marylebone, where they are not wanted and where they will cause a substantial nuisance.

This will increase the number of buses far beyond the 18 per hour mentioned in the consultation, to 30 per hour on Welbeck Street, 40 per hour on the south side of Cavendish Square and 52 on Margaret Street, with nothing to stop TfL increasing the numbers still further once they have achieved permanent closure of Oxford Street. Indeed they are already being lobbied to do so by groups such as London TravelWatch who realise that the projected number of routes and buses down Wigmore Street will be insufficient for the needs of the network.

7. Servicing businesses once Oxford Street closed to traffic

“We believe that the majority of businesses on Oxford Street West can make or take deliveries through loading facilities at the rear of their premises and on side streets and so would not require day or night time access to their premises directly via Oxford Street West”

TfL Consultation Document November 2017

As stated previously this is very hard to reconcile with TfL’s own findings which show over 35 per cent of businesses surveyed have no rear or side access(Schedule 1), and even harder to reconcile with the BOS survey(Schedule 2), showing the number of shops with no rear or side access at around 45 per cent.

This would indicate that the disruption and congestion to be suffered on the roads surrounding Oxford Street through increased servicing needs will be considerably greater than the consultation documents reveal. This is a very serious problem, considering the immense pressure these streets will already be under with all the additional vehicles that will have been pushed in to them.

In addition all these shops and businesses on Oxford Street without rear or side access would then need designated and properly constructed waste collection areas, to store their daily rubbish prior to collection. This does not however appear to be contemplated in the transformation proposals. In the absence of these the side streets will be indeed be transformed — by mounds of rubbish left on them for collection. Not only will this be unsightly and unhygienic, the additional noise and disruption that the collection of this will cause will be considerable.

8. Access by the old and disabled

“We are working closely with a range of representative groups for older and disabled people to refine our plans.”

“...and have discussed our proposals with a wide range of stakeholder groups that represent the needs and interests of disabled people, older people and other equality groups.”

TfL Consultation Document November 2017

This statement would appear to be questionable on two counts. Firstly we read that a series of engagement sessions have been carried out with various individuals, but how were they selected, and were these separate to direct discussions with the key stakeholder groups? Secondly, why are we not told of the outcome of these engagements rather than just given a list of generalised statements? Could this indicate a lack of support? It is difficult to envisage a scenario where removing the buses relied on by the old, disabled, (and mothers with young children, and shoppers), would

have been welcomed. Not only will they face a difficult change of buses, where before they stayed on one, but a walk of up to 400 metres to the next bus stop, unmanageable for many. On TfL's own figures 2,000 disabled freedom pass holders use the buses on Oxford Street everyday and around 8,500 over 65 year olds. There will of course be many others with disabilities who do not hold freedom passes to add to this figure.

It is interesting that the lack of public toilets was one item highlighted in the engagement sessions as a concern to many. Yet this had absolutely no impact on the ultimate transformation proposals, where it is specifically stated that there are no additional provisions for public toilets to be made. It is hard to resist the conclusion that the engagement sessions were just one more necessary box ticking exercise to complete on the way to transformation.

There is a list of the groups worked with in the consultation document. We have been unable in the time given to make contact with any group able to confirm that they are happy with the transformation proposals. We have contacted a number on the list however, who either claim to know nothing of them, or are aware, but have had little contact with TfL regarding them. We wonder how much consultation has actually gone on directly with these groups? As opposed to engagement sessions with a few nominated individuals, which is hardly the same thing. We requested the contact details for the groups to get further information on this, but this was not provided within the time available to pursue this line of enquiry. We therefore reserve the right to add our observations as a supplement to this response at a later date once we have been supplied with the information requested.

9. Pedestrian access on Oxford Street

"We strongly believe that Oxford Street must change. Pedestrian crowding is already a significant issue and will become more pressing in future."

TfL Consultation Report October 2017

In fact pedestrian numbers on Oxford Street are falling due to such factors as online shopping and more convenient shopping centres and the extra numbers to be introduced by the Elizabeth Line is at present unknown. Just in the same way as pollution levels are rapidly falling due to reduction in bus numbers and improvements in emission standards. Could there be reasons, other than pedestrian comfort, and not specifically stated in the consultation, for pedestrianisation? What do we know about what is intended for all the freed up road space? From the artists impressions presented in the consultation papers it is made over entirely to pedestrians, walking over large areas of coloured roadway, but it would seem that the developing Management Plan has other ideas, it would like to see:

"A place that is alive for longer: designing space for restaurants: al fresco dining areas; programmes of late evening activity, such as pop up theatre"

WCC/TfL booklet: Guide to the Management plan

In other words businesses will be encouraged to expand (and contribute) to fill the void left by the traffic. Aside from any other worries over noise and nuisance, this of course calls into question one of the main pedestrianisation arguments; if more space is really needed for pedestrian comfort, why go and then clog it up with all this? Further questions follow; what are the relevant contributions from various stakeholders? How many and what sort of "alfresco" dining areas? What programmes of "late evening activity" will be allowed? Answers to these questions would be of great interest to all

the residents living nearby and help them make an informed decision on the true merits of pedestrianisation. However the answers cannot be found in the Management Plan, as unfortunately it does not yet exist. Yet once again we are expected to reach decision on transformation and how it will work without many of the salient facts.

10. The Mayors promise

The need for all this transformation is usually blamed on the need for the Mayor to honour his manifesto commitment. The Mayor's promise, is often cited, but seldom quoted; so what did he actually say?

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 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."*

Sadiq Khan for London. A Manifesto for all Londoners 2016: Mayor's promise under section 8 - Travel greener and pedestrianise Oxford Street.

So it is necessary to undergo transformation because the Mayor promised to do it in his manifesto? But he did not; at least not in its present form. In fact the Mayor would be breaching his own promise by implementing the consultation proposals in their present form; because he has failed to comply with what he said in it: local businesses, in the main, remain unconsulted and ignorant of the whole scheme; the taxi driver associations are all opposed but have been sidelined and ignored; there have been no car free days or weekends; an "eventual ambition" to "move towards" pedestrianisation is now a headlong rush, with the consultation ending in January 2018, for Oxford Street to be actually closed to vehicles by November 2018. This was not in the Mayoral promise.

11. A done deal?

"In preparation for the delivery of the proposals described above, Westminster City Council and TfL have appointed Conway AECOM to begin planning how the scheme could be delivered with minimum impact to residents, local businesses and visitors to the Oxford Street area."

TfL Consultation Document November 2017

*"Much of stage 1 **will be in place by next December**, but we want to leave room for evolution through the time stage 1 is in place, to test ideas in response to an increasing understanding of how the changes to vehicular and pedestrian movement and behaviour impact the dynamics of the district: how it looks, feels and functions."*

TfL Factsheet-from booklet: Design principles and concept for the first stage transformation of Oxford Street

Throughout this consultation we have needed to struggle with inertia due to the widespread feeling that this has already been decided. There is a widespread feeling that the consultation is just a necessary box ticking exercise, it will change nothing, we won't be listened to and pedestrianisation will happen, because the Mayor and big business want it to happen. And when statements like those above appear in the official consultation literature, that attitude is hardly surprising.

However we submit that pedestrianisation should not be a done deal unless it is the right deal for the area.

The fact that the Mayor put in his manifesto, more an aspiration, rather than a promise, to eventually achieve pedestrianisation does not trump the need to closely examine its viability. This annoying need to have policy tested to assess its fitness for purpose came across at the consultation launch when the Mayor appeared to believe he was actually launching the pedestrianisation proposals themselves rather than a consultation on them. It is this sort of behaviour, and the perceived failure even to entertain the possibility that there may be a better way forward, which has led to the widespread belief that pedestrianisation is a done deal. This then becomes self-fulfilling as those opposed see no point in responding to something they see as inevitable.

Section D

ISSUES WITH PUBLICITY

Not only is the terminology used in the consultation misleading but so was the way in which the first Oxford Street consultation was subsequently publicised:

1. Misleading reporting

On the first consultation 7883 counted responses were received in total.

- 43% selected 'I support the transformation of Oxford Street and I am comfortable with the changes that would be necessary to make this possible'
- 19% selected 'I support the transformation of Oxford Street but I have concerns about the changes that would be necessary'
- 30% 'I do not support the transformation of Oxford Street'

This was then counted as 62 per cent in favour — this is not equitable, if 19 per cent of the respondents have unanswered concerns they should not be counted as in favour. Whilst we accept that this may have been done inadvertently, a repeat of this with the present consultation would be unacceptable and be regarded as deliberate obfuscation.

In fact only a third of respondents were local residents and more than **65%** of these local residents were either opposed to or had concerns about the plans.

Businesses, whom we were told would welcome this, were even more opposed with **76%** against or with concerns, (60% of whom were against), with only 19% in favour.

These figures were not mentioned in any of the TFL or WCC subsequent press releases.

It is submitted that it must be absolutely fundamental to the consultation that this time the views of local businesses and residents are taken fully into account and accurately reported in any public statements or press releases.

2. What has Scotland to do with it?

By this we mean: why did the previous consultation weigh the concerns of those who live and work in the West End equally with views of those who don't live or work anywhere near London? So the views of those as far afield as Dundee, and beyond, counted for the same as those in the West End. The only interest most of those had who live that far from London was an ideological commitment to the concept of pedestrianisation. These people responded to the last consultation in large numbers without any personal knowledge of the issues but on the simple belief that any pedestrianisation is a good thing, which it may well be in Dundee, but not necessarily here. Thus the consultation is skewed in favour of a national activist element (although at least the Living Streets email template response was separated out for which we are grateful).

As well as this, the consultation reporting was then further muddied by adding all those with concerns to the Yes's, to suggest that the scheme had widespread support from Londoners, which was wrong; it did not. This time, once again, the level of online response has been high, but a large amount will again come from national groups who have put out direct links to the consultation on their web sites. It is important that our area's future does not end up being decided on a national level, rather than by those that live and work here. This is a major concern and needs to be confronted to prevent a later challenge to the overall fairness of the consultation.

We strongly submit that London and SE responses should be separated off in the consultation report and given priority over those from all other parts of the UK.

Section E:

WHAT ARE THE IMPROVEMENTS/BENEFITS TO SURROUNDING AREAS?

1. The benefit of the whole district?

The plans are repeatedly sold on the basis of transformation of the Oxford Street District:

"We want to be clear that we are not just looking at how to improve Oxford Street itself, but this is a scheme that must benefit the whole district. The thousands of responses we have had will inform a much more detailed consultation on very specific proposals for the benefit of the whole district."

Joint letter from Deputy Mayor, TfL and WCC

"Our ambition does not stop at Oxford Street. we also want to deliver a series improvements to the surrounding districts, taking into account the needs and the characters of the different areas"

TfL Consultation Document November 2017

We would submit that it is quite clear that in fact the ambition does indeed stop at Oxford Street, as the consultation delivers no series of improvements to the surrounding districts, indeed few improvements at all that are not necessary for the betterment of Oxford Street itself, like continuing some of the new paving round onto the side streets. Wigmore Street, which gets all the buses, also gets four extra crossings and pavement widening in various areas, but they are there only to further slow the traffic and act as a deterrent to vehicles and cycles using the street. Many of the streets immediately off Oxford Street and destined to service it, are to be eventually given, once the funding is found, "high quality paving" by the Oxford Street end which would be welcomed. What will not be

welcomed are most of the other “improvements”; whilst new bus stands, bus stops, loading bays, taxi ranks, bike stands and rubbish collection points, throughout the area may be classed as transforming it, they certainly will not be improving it.

Further the areas around Oxford Street are more impotent economically than Oxford Street itself, the West End employs around 250,000 people, bringing in 40 billion in annual GVA. Any scheme that fails to fully embrace the whole area and instead impacts on its viability through creating more congestion and pollution could drive business away and end up losing far more money for the surrounding area that it will ever create for Oxford Street.

We would submit that there was an opportunity to look at the entire area in an integrated way and develop a functioning urban scheme to the benefit of the whole West End, that looked beyond benefiting one road, but it unfortunately this is not it. In addition as far as we know there is no funding yet arranged for the second stage, which is meant to address improvements to public realm in the surrounding areas, other than the strictly necessary changes directly linked to the scheme.

2. A piecemeal approach

In addition the piecemeal approach of consulting on sections at a time itself forestalls the chance for a positive area wide approach which should take in Marble Arch to the west and Tottenham Court Rd areas to the east. Both of which have problematical relationships at present with Oxford Street which total closure will only serve to emphasise; there is no clarity whatsoever as to how the Marble Arch and Tottenham Court Rd areas can handle even larger volumes of buses than at present. Marble Arch is already at capacity and yet more buses are to terminate there. The present proposals present a wasted opportunity to integrate it into Oxford Street and Hyde Park; indeed they divert even more vehicles round it than it at present leaving it little more than a polluted and traffic ridden roundabout and bus depot. The important relationship with Regent Street needs also to be considered as under the present proposals as Oxford Street’s gain will most definitely be Regent Street’s loss.

3. Definition of the “Oxford Street District”

There is no specific definition of what the “Oxford Street District” is in the consultation, it appears to be that area which is nominated to service Oxford Street from the side roads and take its displaced traffic, particularly the buses.

There is, however, a clear definition of what the Marylebone Low Emission Neighbourhood is: it is that area north of Oxford Street, most of which will be on the front line to take much of the traffic and pollution from Oxford Street. There is a peculiar irony in TfL granting one million pounds to ostensibly clean up Marylebone’s air by a series of micro initiatives such as “parklets” only then to think it is quite acceptable to run most of Oxford Street’s displaced traffic through a designated low emissions area.

The surrounding districts are therefore destined to be relegated as servicing areas for Oxford Street or to be severed from it.

The biggest benefit to the whole district would be achieved by stopping all this now.

Section F

PROPOSALS FOR TRANSFORMATION - KEEPING OXFORD STREET OPEN

All the surrounding amenity societies to Oxford Street, and beyond, agree that improvements are necessary but, unlike those proposed, they should be for the whole area, measured, properly evidence based and incremental.

We maintain that the existing transformation proposals aim at maximising turnover on one street and represent a missed opportunity to improve the wider area. There are alternatives which could look at major improvements whilst keeping Oxford Street open, indeed we would argue that **improvements to the whole area are only possible by keeping Oxford Street open.**

We however remain positive that much could be achieved that would be to the reciprocal benefit of Oxford Street and the surrounding areas and we would be happy to work towards developing a more unified scheme. The following steps below could be used as a starting point in looking at a transformation of Oxford Street and the area that could avoid diverting traffic into surrounding areas, subordinating them to Oxford Street and removing accessibility.

FOUR KEY ISSUES THAT COULD BE IMPROVED WITHOUT CLOSURE

1. AIR QUALITY

A. Buses - reduce numbers, as already in process, and change to hybrid only, with a strict timetable on further moves to electric only.

B. Taxis - bring forward date for emission compliant taxis — meanwhile TfL could regulate the number that use Oxford Street, by a number of methods. One could be based on emissions, only low emission vehicles would be permitted after a certain date.

C. Delivery Vehicles - impose charges for the more polluting vehicles, look at reduction in numbers through freight consolidation, etc.

D. Vehicle idling - stricter enforcement on this by allowing parking wardens to impose tickets on idling vehicles.

E. Present Mayoral, GLA, WCC, initiatives - plans to extend the Ultra Low Emission Zone, T-Charge; these could be further tightened and charges increased, particularly on the larger diesel vehicles with further initiatives to consolidate freight deliveries and waste collections.

2. PEDESTRIAN COMFORT and SAFETY

A. Pavement widening - widening existing pavements at perceived pinch points in Oxford Street could help confront the problem, not simply send it elsewhere.

B. Pavement clutter - surplus signage, badly positioned street furniture, street hoardings, disguised as telephone boxes, trading booths, all impede pedestrian access and need to be reviewed, changed, improved and removed entirely in some cases.

C. Pedestrian crossings - could be increased, re-balanced and made safer by giving pedestrians more time to cross junctions. Diagonal pavement crossings could also be considered at some other junctions as at Oxford Circus.

D. Tube Access - consider introducing step-free access at Marble Arch and Oxford Circus prior to any further curtailment of public transport.

E. Westminster Walking Strategy - should be implemented, particularly on Wigmore Street - Mortimer Street.

F. Traffic free days - to allow for full closure of Oxford Street on certain named days.

G. Construction works - review and rationalise road capacity and pavement capacity reduced by closures caused by construction works of all kinds.

3. PUBLIC REALM

A. Build a central reservation - on Oxford Street West, like Regent Street and Oxford Street East

B. Lack of public toilets - with the obvious consequences. New developments should make provisions for these.

C. Improved public spaces - opportunities for greening and quiet areas, improvement of existing; e.g. return Hanover Square to a functioning Square, protect existing trees. Improve access to Cavendish Square, concentrate on traffic reduction around it to try and create a true urban oasis area. Reorganise Marble Arch to create a truly impressive asset to the area, improve access to it, develop it as a proper gateway to Oxford Street and to Hyde Park, aim to reduce traffic round it, rather than relegate it to a polluted and noisy roundabout, the inevitable consequence of the present proposals.

D. Tree planting - along both sides of the street, or on a central reservation in order not to affect pavement width.

E. Art - look at further opportunities for public art, through genuine involvement with nominations from local residents and businesses.

F. Heritage - encourage shopkeepers to improve their shopfronts and exteriors generally, the older buildings to better reflect their heritage, discourage bland plastic signs which tend to give a cheap and nasty appearance.

4. IMPROVED REGULATIONS AND ENFORCEMENT

A. Enforcement of banned traffic - WCC have not been prosecuting banned vehicles from using Oxford Street, as a result there is a certain amount of illegal traffic using it, which could be removed but this will need investment in cameras.

B. Buskers and Street Traders - proper and more effective control is needed, their activities often narrow the pavements at the busiest places, e.g., in front of the station entrances and exits. This has proven difficult with the street open, with it closed we would be faced with the same situation as Trafalgar Square North and Leicester Square.

C. Pedicabs - need to be banned or strictly regulated, they are unsightly and a significant source of congestion and noise on Oxford Street and elsewhere.

D. Deliveries – servicing on the roads surrounding Oxford Street should be kept to a minimum and the noise and nuisance properly regulated and enforced. Freight consolidation should be considered, as it has been in Regent Street, to reduce number of vehicles servicing shops, but there should also be realism about just how effective this can be in such a disparate scenario as Oxford Street. It also has considerable downsides that the relevant authorities need to be aware of, such as the tendency to encourage the use of more HGV's in Central London, which cause considerably more noise, vibration and disturbance than smaller lorries, particularly at night.

E. Sunday free parking - this simply encourages people to drive in, introduces more congestion, pollution and clutter and should be reviewed urgently. If transformation were to go ahead, change would be essential otherwise, with all the extra parking on single yellow lines, many roads would become impassable by all the extra traffic.

NONE OF THE ABOVE NEED CLOSURE TO IMPLEMENT

SEVEN POSITIVE ADVANTAGES TO KEEPING OXFORD STREET OPEN

1. GREATER PUBLIC SAFETY - in allowing emergency services easier access to Oxford Street. The surrounding congestion caused by its closure will greatly impede this, as will all the proposed clutter to be sited where the traffic presently runs. A trafficked street offers less opportunity for terrorist attacks with vehicles; as we have seen pedestrian only streets are more open to this threat.

2. CONTROL AND ENFORCEMENT - i.e., busking and street performers - WCC already find this very difficult to control - how much more so with a Trafalgar Square type environment attracting huge numbers of street entertainers and the criminal element that goes with them.

3. SAFEGUARD TRADING - traffic is the lifeblood for shops in a long street such as Oxford Street, it is essential to have transport to get to, from and along, for the old, the disabled, for those with heavy shopping, it is needed for deliveries, and very convenient for the rest.

We thought the lesson had been learned that increased footfall does not equate to increased sales, this was demonstrated from the failure of traffic free days to generate meaningful increases in rev-

venue and was why they were stopped. If Oxford Street is closed it is quite likely that many who previously travelled there to actually shop will be put off, not least by the pollution and congestion getting there, and will prefer the nearby alternatives, such as Brent Cross, and the Westfield Centres at Shepherds Bush and Stratford.

Oxford Street, far from seeing increases, could actually lose revenue. How many bus users will just give up and go elsewhere once there are no buses to Oxford Street? Indeed it is not only the bus using public that will be driven away, it is also the highest spending demographic. Do they really think that these people will be willing to sit in taxis trying to get through the congestion and pollution in the surrounding areas only to be told that they will need to get out and walk for the final half mile, and then back again to some designated taxi rank laden with all their shopping? They will just go to Knightsbridge, or elsewhere, instead.

4. PROTECTION OF SURROUNDING AREAS - its roads and squares, from additional pollution and congestion caused by traffic displaced from, and servicing Oxford Street, or in the case of Marble Arch From being severed from it and left as nothing more than a very busy roundabout.

5. ELIZABETH LINE - opens in 2018, but only part of it, the assumption is that this will decant large extra numbers into Oxford Street - but this is mere assumption without any properly evidenced research that has been divulged. There is a strong argument for a wait and see policy to find out what actually happens before taking drastic and expensive steps to counter a problem which may be found not to exist. For instance, the Elizabeth line will result in reduced stress on the Central Line and key stations meaning a compensatory reduction in footfall from these stations.

6. LESS CRIME - Night-time safety due to traffic flow - crime enforcement, much easier on a street with traffic, less opportunities for crime on a street with traffic, with less shelter spots, and more likelihood of being seen.

7. ALLOW TIME TO ASSESS ADDITIONAL IMPACTS FROM MAJOR ROAD CHANGES IN THE AREA - all coming into being around the same time as proposed changes to Oxford Street - and all threaten further congestion in one form or another.

CHANGES THAT COULD IMPROVE SURROUNDING AREAS WHILE KEEPING OXFORD STREET OPEN:

A. Partly undertaken:

Air monitoring on surrounding streets - poor air quality - it is not only Oxford Street that has poor air quality, all the surrounding areas regularly exceed EU guidelines both on NoX emission and particulate matter (PM). We need a baseline study now to get better statistics on pollution hotspots around the area. We are taking steps to commence monitoring NoX emissions in the area around Oxford Street in order to find out more about this. Some monitoring is now being undertaken by TfL/WCC, but most of the projections rely on mere extrapolation from the existing computer traffic modelling which is questionable on its own account.

B. Not under present consideration:

Change buses - to fully zero emission, practical at present only with swingle decker buses.

Bring forward dates for improved emission controls - on all diesel vehicles, including taxis.

Open side streets - closed by Crossrail works.

Remove build-out at Oxford Circus - to allow bus lane southbound (current build out appears to be mainly used by illegal buskers) removing the pinch point this has introduced which causes increased congestion and pollution from queuing traffic in Upper Regent Street.

Public spaces - look at opportunities for improved public spaces in the area.

Taxi touting - generates a considerable amount of unnecessary mileage and hence more pollution - in addition private hire pay no congestion charge - this should be reviewed. The Uber business model tends to flood the West End with cars seeking jobs.

Pedicabs - these must be bought under control by whatever means necessary as a matter of urgency.

Holistic scheme for genuine traffic reduction - consider the design of a "low traffic neighbourhood" with real restrictions on traffic going into it, not just buses.

SUMMARY

Pedestrianisation brings with it many consequences and difficulties, that many agencies have struggled with for 50 years now, ever since it was first proposed. Until now the obstacles to pedestrianisation appeared insuperable which is what has so far prevented it from happening. In fact they still are, for closure brings with it many more problems than it solves, such as public safety concerns; accessibility issues; servicing problems; congestion; disruption; traffic displacement, noise and pollution to surrounding areas. For years even TfL refused to consider pedestrianisation mainly because it would involve dismantling the existing bus network. However it is for the first time on the political agenda: the present Mayor made a promise to do it, so actual viability is now replaced with political expediency, and mere overwhelming weight of evidence against this project is no longer sufficient to deter.

However pedestrianisation is not, or should not be, a done deal just because the Mayor and now TfL want it. Putting something in a manifesto because it sounds like a good, potentially popular, idea is one thing. Sound, evidence-driven policy-making is quite another.

Perhaps if we had to single out the biggest issue or problem with the transformation plans, out of everything that has been submitted above, it would be that, apart from buses, there are absolutely no proposals for reducing the existing traffic travelling to, through, and servicing Oxford Street. It will all just be left to find its own way through the surrounding streets. This is totally unacceptable. It is a recipe for disaster.

The consultation ignores the reality of traffic displacement, and relies on the theory, or hope, of traffic evaporation: if a road is closed or restricted the traffic that used it before will simply disappear, with a little help from the local area traffic signal network, rather than clog up surrounding areas. This is the fallacy on which the modelling for the Cycle Superhighways was based, which we have seen fail on the Embankment, on Bayswater Road, in Hyde Park and elsewhere. There is now more pollution and congestion and traffic displacement in these areas than before the schemes were implemented. Central London's roads are more congested than ever, but with 20% less traffic than in 2000! Much of this due to removal of network capacity. So what we have seen fail elsewhere, we will see fail here, and we will all pay for its failure, this time, in all the neighbourhoods around Oxford Street.

There is little doubt that the area will be transformed by what is proposed, but not we fear for the better. The closure of the A40 - Oxford Street, will have a major and unacceptable and indeed a damaging impact on the wider area. Unfortunately the whole process is inside out. It should be the local and residential areas where traffic is reduced and the commercial streets, like Oxford Street, which are kept open for through traffic. Instead of a holistic scheme for the improvement of the overall look and feel and function of the whole Oxford Street area, we are presented here with a piecemeal project for the possible benefit of part of one street in the West End, to the definite detriment of many of those surrounding it.

We feel that there must be a better way than this. There is major scope for improving Oxford Street whilst keeping it open to a certain number of buses and taxis, in fact there are many positive advantages to be gained by keeping a modest amount of traffic on it. There is scope for traffic reduction in the area as a whole, but not by closing its main street. This is too great a price to pay for the benefits on offer. To choke off a key part of the road capacity of Central London like this will increase congestion, reduce access, harm the many surrounding businesses in the area, and damage the health of its residents, it is entirely unwarrantable. So the question that needs to be asked is this: why, apart from purely political reasons, blight our surrounding areas to achieve some dubious and unproven benefits to one shopping street in the centre of London?

Yours faithfully,



Michael Bolt
on behalf of Better Oxford Street
Supported by, and part of the West End Community Network

SCHEDULE 1 - Business Summary Spreadsheet, forwarded by email attachment

SCHEDULE 2 - BOS Business Survey, forwarded by email attachment