



FREEPOST TFL CONSULTATIONS

Church Commissioners
Church House
Great Smith Street
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Dear Sirs

Oxford Street Transformation Representations on behalf of the Church Commissioners for England

The Church Commissioners welcome the opportunity to respond to the Oxford Street Transformation.

Background

The Church Commissioners for England are a major landowner within Westminster. The Hyde Park Estate (the "Estate") is one of the largest residential estates in central London still in single ownership. The Estate is located to the north-west of Marble Arch and to the north of Hyde Park. The Estate is bounded by Edgware Road to the east, Bayswater Road to the south and Sussex Gardens to the northwest and covers over 36ha.

The Church Commissioners have been responsible for the development and management of the residential properties on the Estate since 1868. The Estate's dedicated team manages over 1,700 residential properties, alongside the shops and services in Connaught Village. The team also manages the parks and gardens located within the Estate.

There are many opportunities to enhance the properties and public areas owned by the Estate, and also opportunities to provide new housing and commercial floorspace through refurbishment and development projects, which should enhance the Bayswater Conservation Area and the setting of historic buildings and parks.

Oxford Street Transformation

Whilst there is some detail in respect of the first phases of the Oxford Street Transformation, it is clear that the greatest impact on the Estate and Edgware Road is likely to be the later phase between Orchard Street and Marble Arch. Although this element does not have the transformational effect that the first phases have on Oxford Street, it does have the potential to have a significant impact on the area around Marble Arch.

Edgware Road is at a critical point. For many years it has been seen simply as part of the Inner Ring Road. However, with improvements in air quality and with scope for regeneration and growth on both sides of the Road, it is critical that the transformation of Oxford Street does not prejudice this opportunity. This regeneration will flow from the activity and sense of place which is being



created around Marble Arch. The regeneration of Marble Arch is in its infancy with schemes such as the temporary theatre. The Church Commissioners are therefore very concerned that this area should not become a destination for numerous bus stops as it will totally undermine the effect this area could have on Edgware Road. The Church Commissioners therefore request that they are kept up to date on the emerging proposals for this area in the future and that the detail comes forward as soon as possible.

Whilst the Church Commissioners are supportive of plans to transform Oxford Street, they remained concerned that the pedestrianisation of Oxford Street could lead to increased traffic in the surrounding areas including Edgware Road and the Estate. This problem is acknowledged by TFL within the consultation where it is stated "there are some locations where traffic flow may increase", in particular, reducing the number of lanes on the circulatory carriageway of the gyratory outside Marble Arch Station. Displaced traffic using Wigmore Street and the Edgware Road is likely to create more traffic cutting through or 'rat-running' the Estate itself, which is of significant concern for residents and businesses that would be affected.

The Church Commissioners therefore support the acknowledgement within the Consultation that proposals to protect the residents living in the wider area from the existing pressures of traffic and pollution are required. The Church Commissioners request that in conjunction with the proposals for Oxford Street, the Mayor considers the extension of the 20 mph zone to the Edgware Road, and the entire Estate, alongside other traffic calming measures to maintain amenity and pedestrian safety in the surrounding areas. This will help to mitigate the concerns of the residents.

The Church Commissioners are also supportive of proposals to deliver a series of improvements to the surrounding wider districts in conjunction with the proposals for Oxford Street itself. In particular, the Church Commissioners are supportive of proposals to widen the footways around Marble Arch and request that public realm enhancements are also extended to Edgware Road. Continued funding for this is critical to the success of Edgware Road.

Air Quality

The Edgware Road forms the congestion charging zone boundary. As a result Edgware Road suffers from congestion with more than 3,400 vehicles (including 78 buses) using the road per hour as they seek to avoid the congestion charging zone. The constant acceleration and braking of stop and go traffic burns more fuel, and therefore pumps more pollutants into the air. This has a profound impact on the air quality within the area.

Whilst London's air quality has improved significantly in recent years we still do not meet the legal limit in London for the pollutant known as nitrogen dioxide (NO_x), which has impacts on public health. The other pollutant of concern is particulate matter (PM) and there are no safe limits for PM_{2.5}. Road transport contributes around half of emissions of oxides of nitrogen (NO_x) in Greater London. Diesel vehicles form a significant proportion of these. NO_x emissions form harmful NO₂ in the atmosphere.

Whilst the Church Commissioners are supportive of the proposals to introduce an ultra-low emission zone (ULEZ) for inner London in order to improve air quality, they are concerned that the introduction of such a zone threatens to make the position worse on the Edgware Road. The zone could result in shifting more drivers and more polluting traffic onto the Inner Ring Road as they seek to avoid penalty charges from driving in the ULEZ.



The Strategy should therefore be mindful of this in measures it proposes for central London. Measures including cleaning the bus fleet and proposals to reduce freight should also be applied to the Edgware Road.

There is also a need for greater actual air quality monitoring in key locations such as the Edgware Road to measure progress, detect the changes brought about by changes such as the introduction of the ULEZ and the operation of the congestion charging zone. Further to this, it would be useful to understand how the practicalities of the ULEZ would impact residents and commercial deliveries within the Estate, as well as further information regarding data sources, particularly centred around increased travel time predictions.

It is also considered that there is justification for seeking a wider ULEZ boundary beyond that of the congestion charge in order to afford some level of protection to the Edgware Road.

General Matters

The Church Commissioners feel strongly that Edgware Road is being overlooked by the Mayor as part of the transport strategy for London. The Edgware Road has the potential for significant regeneration and enhancement but this is in part being hampered by the existing congestion and air quality which is likely to be exacerbated by the pedestrianisation of Oxford Street and the ULEZ.

The Church Commissioners would request further evidence on the impact of the transformation of Oxford Street on Edgware Road and the Estate as this is a significant concern for residents.

As identified the Oxford Street transformation has the potential to significantly impact Edgware Road. We understand that TfL have funding to carry out a further study of bus movements on Edgware Road. We would support the early implementation of this study.

The Church Commissioners encourage the Mayor to engage more widely with major land owners across London. The Church Commissioners wish to work with the Mayor to deliver a holistic approach to transport.

The Church Commissioners are grateful for the chance to respond to Oxford Street Transformation and welcome future involvement as the strategy is progressed for the Marble Arch section.

If you wish to discuss this further please do not hesitate to contact me.

Yours faithfully

Rosemarie Jones
Deputy Surveyor