

Transformation of Oxford Street

3 January 2018

ABOUT US

Heart of London Business Alliance serves as the voice for 500 businesses and 100 property owners in the Piccadilly & St James's and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work. The success of the iconic areas of London we represent is inextricably linked to nearby Oxford Street and the wider district.

EXECUTIVE SUMMARY

Heart of London supports the principle of the transformation of Oxford Street. However, we have reservations about aspects of the detailed proposals, which do not live up to the stated ambition and opportunity of this once in a lifetime scheme to transform the whole district and benefit the wider West End. Our key reservations are that:

- Streets south of Oxford Street are at risk of becoming dominated by taxis, buses, and deliveries, and undermining the benefits of investments in to New Bond Street and Hanover Square. Our support is conditional upon achieving a genuine reduction in traffic, not just displacement, and a limited timed opening of the street for servicing and deliveries.
- The air quality benefits of the scheme, while positive, are minimal and demonstrate the need for braver and more comprehensive thinking to genuinely reduce traffic levels, transition to zero emissions vehicles, limit the numbers of taxis and Private Hire Vehicles (PHV), and expand upon the consolidation schemes piloted by central London BIDs.
- Transitional public realm proposals are welcome, but overall they do not go far enough to deliver a truly district-wide transformation. Future second stage proposals for the public realm will be vital to delivering on the vision for the area.
- Significant work is still required on both the delivery plans and management plan. In particular, a new vision for diversifying Oxford Street outside of retail hours is required and proactive plans to manage anti-social behaviour, begging, rough sleeping, street performance and pedicabs within the transformed district.
- This consultation focuses on the transport implications of the transformation of Oxford Street, however a much greater emphasis needs to be placed on the opportunity these proposals present to support future growth and prosperity in the West End.

OUR RESPONSE

Phasing

- With the opening of the Elizabeth Line in December 2018, and the increase in visitors to an already dangerously crowded area at peak times, we support the delivery of the scheme in phases. In particular it is vital to have transitional improvements in place by the end of 2018.
- An overall proposal for the public realm, highway changes, traffic impact, and freight and management strategy should have been set out at this stage to understand the full impact of the proposals along the length of the street and surrounding districts. In principle, pedestrianisation is supported by key stakeholders along the length of Oxford Street and in the surrounding area, but while it makes sense to implement in phases, it does not make sense to design it in phases.
- Marble Arch is a key gateway to the area, and the section of Oxford Street to Orchard Street has no definitive timetable or funding guarantees in the proposals. This area faces some of the most severe traffic displacement and additional bus infrastructure is required to facilitate the western section of the street closing to traffic. There is little investment in the public realm to improve the shopping experience, and the area could remain traffic-dominated for the foreseeable future. This section of the street should be incorporated into the wider proposals.
- Oxford Circus is an important gateway to the whole district, including Regent Street. Consequently, the design of Oxford Circus should invite pedestrians to explore all four directions from the Circus and have sufficient footway space to comfortably and safely enjoy their moment on Oxford Circus. The first eastern section of Oxford Street between Regent Street and Great Portland Street should be added to the western section scheme for delivery by December 2018. Buses could be routed up the southern block of Great Portland Street to connect with currently proposed re-routing. This would complement a better design of Oxford Circus as an iconic London destination.

Highway Changes and Traffic Impact

- We support the principle of a people-focussed Oxford Street and the removal of traffic from the street. We welcome that many of the key concerns and priorities from our response to the April 2017 consultation have been addressed, such as maintaining north-south links across the street.
- We are supportive of further reduction in bus services, with the current planned 40% reductions already having a positive impact, and welcome only diverting the 139 and 390 routes onto Wigmore Street. However, there is little to suggest any similar action to reduce overall traffic volumes, in particular the very large number of taxis and PHV movements we would expect to be displaced to surrounding streets.
- The impact of the transformation on Piccadilly needs to be considered. In particular, we are concerned that traffic will be increased in the area and that this will have a negative impact on air quality. There needs to be ongoing monitoring and further action to reduce traffic in surrounding districts, and curtail transport emissions.
- We are concerned about the impact that traffic will have on residents in the Mayfair area. The displacement of traffic, loading and servicing onto these side streets is likely to significantly increase congestion. It is important that measures are put in place to mitigate the negative impact of noise and disruption to residents.

- Overall the traffic impact on Regent Street is worsened, on what is already a highly congested route with poor air quality. The improvement of Oxford Street should not come at the expense of other major areas of the West End. Further work is required in future to reduce overall traffic volumes on Regent Street, which has seen significant investment from The Crown Estate to transform the visitor experience. We support a faster introduction of the Ultra Low Emission Zone (ULEZ) for central London and continued reduction in bus volumes where appropriate.
- We concur that Oxford Street would not be appropriate to be open to cyclists or pedicabs and should be a dedicated space for pedestrians given the number expected and the desire for a high quality space. If an accessibility service was to operate on these sections, the approach should be carefully considered and regulated to maintain the vision of an open public space.
- The already negative impact of pedicabs on the experience of the West End may be worsened by the transformation. Pedestrianisation is likely to displace many of the pedicab drivers that currently operate on Oxford Street, and we are concerned that they will seek to move into side streets and crossover points. This could lead to heavy congestion in these areas, as pedicabs have the potential to block streets and cause serious problems for traffic. It is important that both physical and management measures are put in place to mitigate this in absence of effective regulatory powers.

Public Realm

- As it stands, the ‘transitional’ changes do not live up to the aspiration for a full ‘district-wide’ vision for the area, nor are the possibilities for stronger links with surrounding areas and historic London squares exploited fully.
- Second stage public realm proposals need much greater work to be truly transformative for the wider area, not just Oxford Street, and live up to the aspirations of the Mayor’s Healthy Streets agenda. Without guaranteed funding for these changes, the benefits of the transformation will be largely restricted to Oxford Street and limited in their overall impact.
- With the current proposal, Oxford Circus would become an unbalanced space, losing its coherence as a focal point for Oxford Street and as an important gateway to the whole district, including Regent Street. Consequently the design of Oxford Circus should invite pedestrians to explore all four directions from the Circus and have sufficient footway space to comfortably and safely enjoy their moment on Oxford Circus.
- The footways on the eastern side of Oxford Circus are to be reduced to support the transformation of the western side of the junction. This area already has a low pedestrian comfort level with concerns over current safety issues at Oxford Circus. The pedestrianisation of the eastern side of the junction would provide a safer environment as well as support and encourage exploration of all four directions from Oxford Circus.
- The opening of the Elizabeth Line at Bond Street station in December 2018 will significantly increase footfall to businesses on Oxford Street. It is important that this is considered and that public realm improvements are designed to attract visits to shops and businesses in this area and the wider district. It is also important that all aspects of the scheme work alongside one another, to ensure that sufficient transitional public realm is in place by the time the Elizabeth Line opens.
- Additional east-west cycle routes and facilities will be required, and we welcome that detailed proposals will be considered and fully consulted upon in due course.

- Careful thought and lessons from the recent ‘scare’ at Oxford Circus on Friday 24th November should be fed into the design process for the public realm to minimise the danger of injuries and crushing.
- There are concerns around the visual and spatial impacts of Hostile Vehicle Mitigation (HVM) measures, specifically their design and locations. More information on the detail of proposed approach to HVM across the scheme would be welcomed. Specifically, greater detail is needed about how necessary vehicles (i.e. emergency services) could gain access through the HVM lines and so that crossover points do not become informal pedicab ranks, blocking the highway and disrupting business.
- We are concerned that the level of investment in the side streets to the north and south is not sufficient, and that the public realm improvements on these streets will not be of the same calibre as those on Oxford Street based on the published designs. These streets will bear the burden of displaced traffic and activity, and require careful thought to their own needs.

Air Quality and Noise

- Heart of London welcomes the air quality and noise monitoring and modelling that has been undertaken to date, and we are pleased that the initial results indicate relatively low localised harms, and overall benefits. However, further action to reduce traffic in the surrounding district and curtail transport emissions is still clearly required. We welcome the planned approach to ongoing monitoring in the whole area.
- While bus reduction is welcome, emissions from buses, taxis and PHV and cars will have to be reduced dramatically beyond current plans and those outlined in the Mayor’s Transport Strategy to have a significant impact.
- For such a major intervention, and with consideration for the ULEZ, the positive benefits to air quality are minor, though welcome. This shows the need for genuinely holistic policy and public realm changes across the whole West End in order to achieve sizable air quality improvements.

Servicing and Deliveries

- Allowing timed servicing (out of peak hours) on Oxford Street itself would allow for proportionate removal of loading and servicing bays from side streets, as well as more stringent restrictions on operational hours of servicing across the district as a whole to the benefit of all users and residents across the district. The exact period for limited access should be evidenced based and consistent across the district, though we concur with the suggestion by our neighbouring BID the New West End Company of 10am to 10pm closure to all traffic.
- Allowing access to delivery and servicing vehicles outside of busy pedestrian hours need not negatively impact the design ambition for Oxford Street as a whole. Pedestrian priority and level surfaces should remain even if the street is open to the limited traffic of service and delivery vehicles.
- The approach to servicing across the scheme needs to be consistent, ambitious and holistic across the entire district and should not put unnecessary pressure on the side streets in order to close Oxford Street at all times.
- Significant work is still required to resolve the servicing and delivery plans and we make the case that TfL and WCC must work closely with all stakeholders to achieve the necessary solution.
- The consolidation of waste and deliveries by BIDs has made significant reductions in journey numbers. However, we need a much more comprehensive strategy and active support from the Mayor in providing

the necessary physical facilities for further consolidation. This will not be delivered by the market and is highly unlikely to extend beyond a network of larger premises solely through voluntary business action.

- While an overarching freight strategy for London is outside the scope of this consultation, proper coordinated action by the GLA could relieve a lot of fears in the area over traffic impacts if a comprehensive consolidation plan could be agreed.

Maintenance and Management

- There is significant concern over the 10pm to 10am period, where without passive security from vehicles and large numbers of people, the street could become a no-go area. We appreciate that this is identified as a challenge and that there is ongoing discussion about the Maintenance, Activation & Funding Plan (MMAF).
- What the character and activity of a pedestrianised Oxford Street will look like outside of peak shopping hours is not yet defined, despite its centrality to the success of the transformation. This will become one of London's most prominent public spaces. As the street largely has a retail monoculture, the addition of food and beverage, as well as entertainment and cultural attractions will be vital to provide activation. This will need to be considered carefully in the management plan, and it is important to work with the New West End Company and local businesses about how to introduce new uses. WCC will need to consider how their current licensing and planning policy supports the growth of a diverse, culture-led Evening and Night Time Economy (ENTE) on Oxford Street, as well as across the West End in line with the Mayor of London's vision.
- We are concerned a lack of vehicles and pedestrians late at night could lead to Oxford Street becoming a 'hot spot' for rough sleeping, begging and street drinking. The installation of new street furniture could encourage this, creating new areas for people to dwell along the street. This is something that needs to be addressed in the management plan, and through increased police resourcing. However, this resource should not be taken from other busy ENTE areas in the borough.
- Increased anti-social behaviour is a serious risk of the transformation, particularly if there is no agreement for increased resourcing of the police and council services. We also have concerns about poor-quality street performance spreading north from Leicester Square and Piccadilly Circus to take advantage of new public space. Clear rule setting and new licensing powers to regulate the space will be required to manage the street for the enjoyment and safety of everyone.
- The MMAF needs to consider how to manage the displacement of pedicabs from Oxford Street into the surrounding areas and crossover points. There is a risk that the proposals will be a pull factor for pedicabs seeking to benefit from the high number of pedestrians in the Oxford Street District. In the absence of effective licensing powers covering passenger and vehicle safety, fares, driver behaviour and overall numbers, detailed physical and management interventions will be required to mitigate their negative impact.

Funding

- We are concerned that the transformation is proceeding without an agreement on funding for the second stage of public realm proposals. This compromises the ability of public realm improvements to live up to the ambition to improve the whole district, not just Oxford Street itself.

Consultation

- While it makes sense to implement in phases, it does not make sense to design the transformation of Oxford Street in phases. A vision for the full length of the street and its surrounding areas should have

been produced from the start, with clear funding guarantees and timetables for delivering both transitional and permanent improvements.

Unlocking Growth

- While this consultation is focussed on the transport implications of the transformation of Oxford Street, the challenges that are under consideration are wider than traffic, air quality and public realm. The proposals should also aim to support future growth and prosperity in the West End; creating new jobs, and economic activity.
- Support for the good growth that our city needs requires a programme of policy and practical action, uniting transport and infrastructure improvement, planning and licensing policy and strong partnership working between businesses, local authorities, and TfL/GLA. The shortage of commercial workspace in the West End and fierce global competition in retail, entertainment and tourism require new policy solutions.
- To support this once in a lifetime transformation of Oxford Street, good growth policies to support an uplift of commercial floorspace for new and expanding businesses are required, and for the West End to maintain its existing focus as the civic, cultural and commercial heart of the city.
- The nature of how residents, workers and visitors use the city, shop and socialise is changing. The Night Tube, supported by strong partnership work and street management, unlocks the opportunity for growth in the evening and night time economy. Oxford Street is one opportunity amongst many in the West End for exploring a more diverse set of culture and entertainment uses both during the day, evening and night. However, current strict policies need to be amended to support this diversification.

CONCLUSION

Heart of London welcomes this opportunity to respond to the consultation, which has been informed by workshops and discussions with our business members and neighbouring Business Improvement Districts. We support the transformation of Oxford Street subject to the reservations about aspects of the detail as outlined above. We look forward to the next stage of the consultation covering the eastern section of Oxford Street and to reviewing revised proposals for western section.