



Transformation of  
Oxford Street  
Consultation Response

January 2018

## Introduction

The LTDA has served as the professional and authoritative voice of licensed taxi drivers for over 50 years. We are committed to ensuring that our members' voices are heard, protecting the interests of the taxi trade and maintaining the high professional standards that have become synonymous with taxi drivers.

The LTDA has been in continuous dialogue with representatives from both Transport for London (TfL) and Westminster City Council (WCC) over a number of months in order to discuss the proposals for Oxford Street. This dialogue has proven to be fruitful and will be continued as the future of the Oxford Street district is decided upon and as the proposals evolve. Although we are supportive in principle of improving the experience of all road users on Oxford Street, the LTDA has a number of concerns about the plans for the transformation of Oxford Street and LTDA has taken the decision to **oppose** the proposals for the transformation of the Oxford Street district in their current guise, following consultation with its members. Its reason for opposing the measures are set out in further detail below.

## Congestion

The LTDA welcomes TfL's and Westminster City Council's recognition that congestion is a significant problem on Oxford Street, and indeed in the wider area, resulting in delays to taxi journeys. Further, we are aware that local stakeholders have called for a reduction in the number of bus routes that travel along Oxford Street.

However, the LTDA is concerned by TfL's and Westminster City Council's assessment of the impact that the proposals will have on congestion in the wider area. Although a number of north-south crossing points have been included in the proposals, the loss of vehicular access to Oxford Street at all times, as has been proposed, will have far-reaching impacts which cannot be mitigated sufficiently. The LTDA notes that the data provided in the consultation report shows that a number of major roads that already are severely congested, such as Park Lane and Edgware Road, will see significant increases in journey times. Additionally, the proposed re-routing of bus routes onto Wigmore Street and Henrietta Place- which are, again, two heavily congested routes- will augment existing issues.

Estimated Annual average daily flows (AADFs) for Wigmore Street gathered by the Department for Transport (DfT) showed that 11,269 vehicles travel on the approximately 100m stretch of road between Wigmore Street and Great Portland Street each day.<sup>1</sup> With the addition of two new bus routes in addition to displaced taxis, congestion will reach unacceptable levels. Troublingly, these estimates are conservative: since the methodology used in modelling assumes that drivers have perfect knowledge of the network and will always choose the quickest route available, the best case scenario will have these harmful consequences.

The increases in congestion as outlined above will result in taxi journeys in the wider area becoming longer, decreasing the attractiveness of licensed taxis as a public transport mode, and diminishing the ability of LTDA members to provide the convenient and reliable door-to-door service that their passengers rely on.

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<sup>1</sup> Department for Transport (2016), 'Traffic Counts- Westminster', available <<https://www.dft.gov.uk/traffic-counts/cp.php#countpointstable>> (accessed 23 November 2017)



## Accessibility

The LTDA is concerned that the proposals will significantly limit how easy it is to reach Oxford Street. Taxis, which are fully accessible, provide a crucial lifeline for many individuals with restricted mobility, for instance through the operation of Transport for London's Taxicard scheme. It should be noted that all of London's licensed taxis are wheelchair accessible, and indeed are the only form of transport currently on London's roads which are fully accessible, in addition to being guide-dog friendly. Providing a door-to-door service for passengers, taxis prioritise the safety and comfort of their customers above all else, which is why they provide a not only popular, but crucial service to passengers who are disabled or with restricted mobility. The proposals necessitate the loss of door-to-door access to locations on Oxford Street, and harm those with restricted mobility.

It is noted in a report authored by EO Consulting on behalf of London Councils, 'London Council's Taxi Card Usage Review Final Report, version 1, January 2016', that the unique door-to-door service provided by taxis is of particular importance to disabled passengers. In particular, in relation to the mobility-impaired people that were surveyed as part of the review, 91% indicated that the ability to travel door-to-door as a transport option met their need. Although other forms of public transport may be able to provide accessible journey options, taxis are the only form of public transport that can take passengers directly to and from their destination, rather than near to their destination as is often the case with buses and trains. Licensed taxis play a crucial role in providing a safe, convenient and comfortable public transport service to disabled passengers. Without taxi access to Oxford Street, it will become far harder for individuals with restricted mobility to access central London, and the retail, culture, leisure and employment opportunities there. People with restricted mobility will also no longer have the option of hailing a cab after completing their purchases at Oxford Street destinations and leaving comfortably and conveniently. The LTDA considers this to be deeply troubling.

In addition, the proposals result in the loss of other forms of convenient transport for those with restricted mobility. Several bus stops are being relocated up to 300 metres away from Oxford Street, adding extra time and significant inconvenience to certain journeys. The nearest bus stop to Bond Street will be 200 metres from the station's entrance. Current estimates from TfL's bus ticketing data suggest around 2,000 Disabled Persons Freedom Pass holders travel to and from Oxford Street by bus each day. Their journeys are set to be longer, less convenient and less safe. This is particularly worrying since Oxford Circus, the main tube station serving Oxford Street, has no step-free access. Although step-free access is being delivered for Bond Street and Tottenham Court Road stations to coincide with the opening of Crossrail, crowded tube stations are nonetheless incredibly challenging to navigate as a person with restricted mobility. The loss of convenient, safe and comfortable door-to-door taxi service therefore has worrying equalities impacts which cannot be ignored.

The LTDA understands that the needs of London's disabled population are diverse, and often at odds with one another. However, the loss of a fully accessible form of transportation which is proven to provide a convenient, safe and comfortable service to disabled passengers will inevitably have harmful implications for accessibility.

## Air quality

The LTDA is supportive of TfL's and Westminster City Council's ambitions to improve air quality on Oxford Street. The street is widely acknowledged to be one of the most polluted in Europe, harming residents, businesses and visitors alike. The current levels of pollution are of particular concern to the



LTDA since our members who drive along Oxford Street inhale the poor quality air on the street and damage their health as a result.

However, the LTDA is concerned by the projected deterioration of air quality in several key transport arteries that are a direct consequence of Oxford Street transformation. According to the data presented by TfL and Westminster City Council, the concentration of harmful gases will increase in several locations, with NO<sub>2</sub> concentration on Upper Brook Street increasing by 6.5%, and additional increases in NO<sub>2</sub> on Park Lane- a key route for taxi drivers.

Although a commitment to reducing harmful emissions is to be welcomed, the current approach is not mindful of the impacts on air quality in the area as a whole. This poses a serious threat to the taxi trade, in addition to local residents and businesses who will face even worse pollution. Whilst most visitors to Oxford Street are transient, residents in the roads surrounding Oxford Street are a permanent presence, and thus face harm in the long-term. Their needs must be considered on an equal footing with visitors to Oxford Street. The current proposals fail to do this.

Finally, the methodology employed assumes that vehicles in Central London will become cleaner year on year, owing to developments such as Hybrid and Electric buses; Ultra Low Emissions Zones; and the roll-out of zero-emissions capable taxis (ZECs). However, the LTDA is concerned that the latter will be delayed by the transformation of Oxford Street. The LTDA anticipates strong take-up of the new vehicles, but the cost of replacing the vehicles is prohibitive to many. The likely loss of fare income experienced by our members as a result of loss of access to Oxford Street will make it harder for licensed taxi drivers to purchase ZECs, resulting in the older, polluting models remaining on the roads for longer.

## Taxi access

The black taxi is a London icon which plays an integral role in the capital's public transportation network, providing a door-to-door service for passengers.

The reason that there continues to be demand for taxis in the West End is that taxis prioritise the safety, comfort and wellbeing of their customers above all else. Moreover, usage will grow further after the opening of Crossrail as the increased use of Tottenham Court Road and Bond Street stations will increase demand for other local public transport. It is vital that licensed taxi drivers are able to continue providing a high-quality, door-to-door service in the heart of London in order to guarantee the wellbeing not only of the taxi industry, but of London's transportation network.

The LTDA welcomes the suggestions contained in the proposals to pursue stronger regulation of "pedicabs". The proliferation of these vehicles threatens the safety of all road users, as well as damaging the retail experience. Although the suggestion of further taxi ranks is welcome, the proposals nonetheless fail to recognise the importance of door-to-door travel along Oxford Street. As Oxford Street is a long road, the service provided by taxis from one end of Oxford Street to another is essential, particularly for road users with restricted mobility. The loss of the ability to traverse the length of the street will harm road users as well as the taxi trade. In addition, the greater journey times that taxi drivers will have to make as a result of the proposals will result in increased wear and tear to vehicles. The resulting increased maintenance costs will be borne by operators, including the LTDA's membership, again threatening the trade.

Furthermore, the LTDA is concerned by what has been suggested by Westminster City Council by way of an alternative to taxi access to the full length of the street. Under the current proposals, four taxi



ranks providing a combined total of eleven taxi spaces will be removed from Oxford Street. Two new ranks are proposed, with suggestions that an additional three ranks are revised. The efforts being taken to compensate for the lack of taxi access to Oxford Street are recognised and appreciated - however, it remains the case that the provision being proposed is insufficient, and will not compensate for the substantial loss of trade that will be brought about by the proposals.

The observations drawn from a study of the usage of Oxford Street by taxis shows that taxi ranks and local roads would need to meet the demand for an additional 108 vehicles during the busiest single hour. The most demanded location for taxis was adjacent to Selfridges at the western extent of Oxford Street with 38% of all movements observed to drop-off or pick up passengers from this location. If the 38% is applied to the total busiest hour, this equates to a forecast peak demand for 18 taxis to pick-up at the nearest taxi rank to Selfridges, which is currently Orchard Street. Whilst no contemporary data on dwell times is currently available, based on an assumed dwell time of 5 minute for a taxi to wait for demand and load passengers, this demand equates to 90 minutes of rank space over the hour, which would equal two spaces. Although this in line with the existing provision, it only considers the new demand from a single location, not any existing demand or additional demand which would be placed upon the Orchard Street rank if taxis are prohibited from using Oxford Street West. This consideration also assumes that no other demand from local streets is placed on the Orchard Street rank, which is highly likely to be the case in the event that vehicles are banned from Oxford Street West. In sum, the reduced taxi rank space availability will make it significantly more difficult to find a taxi in the area, harming vulnerable road users disproportionately.

In his draft Transport Strategy, the Mayor set out his desire for Londoners to enjoy a “safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish.” The current iteration of the proposals, however, threatens the licensed taxi trade and are fundamentally at odds with the ambition set out in the draft Transport Strategy.

## Local businesses

The LTDA commends TfL’s and Westminster City Council’s ambitions to improve the retail environment on Oxford Street. Oxford Street is the busiest shopping street in the world, and it is essential to the economic wellbeing of London that it retains this status. However, the LTDA is concerned that the impact the proposals will have on the viability of businesses in the West End has not been properly considered.

The proposals consider changes to the ability of businesses to receive deliveries. With restricted freight access to Oxford Street, the many businesses that operate on the street and sustain its reputation as a world-class retail destination would be threatened. In addition to this, with loss of taxi access to Oxford Street, many individuals will face difficulties in accessing the street and patronising the businesses there. The resulting loss of customers and increased operational difficulties therefore threatens the economic viability of these businesses, and jeopardizes Oxford Street’s attractiveness.

Further, with motor traffic being displaced onto neighbouring streets, smaller businesses in the wider West End will suffer significant difficulties in receiving deliveries and welcoming customers - particularly coupled with wider measures in the area such as the West End Project. The West End as a whole contributes three per cent of the UK’s economy, and it is essential that an operating environment is provided which supports this contribution. The transformation of Oxford Street threatens the viability of the West End’s independent businesses – an issue which has been noted by leading voices in the local business community, such as the New West End Company.



## Safety

The LTDA shares TfL's and Westminster City Council's concerns over safety on Oxford Street, and notes the importance of measures aimed at reducing the number of collisions that take place on the street. We note the success of previous initiatives, which have resulted in the number of collisions falling significantly. It should further be noted that the number of licensed taxis involved in these collisions is very low, with no collisions involving a taxi taking place on Oxford Street in 2015. The reduction in bus numbers that has already been undertaken is to be welcomed given the comparatively high number of collisions that buses on Oxford Street have been involved in.

A review of all recorded Personal Injury Accidents (PIA) has been undertaken for Oxford Street West for the five year period between January 2012 and December 2016 (inclusive) to identify the current impact that taxi operations have on the safety of road users in the vicinity of the proposals (see the report appended to this response). Of the PIAs taking place in this period, 62 involved a taxi or private hire vehicle; 132 involved a bus or coach; and 77 involved a pedal cycle. This demonstrates that the number of PIAs involving taxis (assumed as licensed taxis for a worst-case consideration) was significantly lower than those involving other modes of transport. Moreover, of the 286 recorded PIAs three were fatal, 29 were classed as serious and the remainder slight. All three of the fatalities resulted from pedestrian collisions with a bus or coach. Only four of the serious PIAs involved a taxi with 19 involving a bus or coach and seven involving a cyclist. It is considered therefore, that Black Cabs represent the safest form of transport currently operating on Oxford Street West, with more accidents involving cyclists, and considerably more accidents involving buses and or coaches. It is unclear, therefore, what the evidence base is in terms of safety improvements for excluding licensed taxis from Oxford Street West.

However, as the number of vehicles on busy neighbouring roads will increase significantly as part of the transformation of Oxford Street, the number of accidents taking place in the wider West End is likely to increase. This is particularly the case as many of these streets are narrow roads with difficult turning points, increasing the risk of collision and the threat to the safety of road users. Many of the routes that will experience increases in traffic are currently used by significant numbers of cyclists, and with these streets becoming more heavily trafficked, there will be an increased risk of accidents and a reduction in the safety of these routes. It is disappointing to see that the proposals for the transformation of Oxford Street do not include mitigating measures to increase safety in the wider area.

## Pedestrian experience

The LTDA supports TfL's and Westminster City Council's commitment to improving the experience of pedestrians visiting and using Oxford Street, noting the significant economic and cultural contribution the street makes to London. It is accepted that those who visit Oxford Street via the London Underground or Crossrail will benefit from the increased pedestrian space and public realm. However, this must be viewed against the impact on visitors who choose to arrive by taxi, bus or bicycle, for whom the proposals represent a harmful impact. These users will no longer be able to arrive and depart directly from Oxford Street West but instead have to travel to the nearest taxi rank or bus stop. Bus users may also have to make additional service changes to complete their journeys. This is likely to create areas of increased demand with higher footfalls observed close to taxi ranks and bus stops. This may create a less enjoyable experience for these users with crowding at interchange points. It is unclear if any pedestrian modelling has been completed as part of the proposals.



## First round of consultation

The LTDA is concerned that the views of local residents, businesses and other key stakeholders are not being afforded the consideration that is due. It should be noted that, in the first round of consultation, over 66% of local residents indicated that they either outright opposed the transformation of Oxford Street or had concerns. This figure rises to 76% amongst owners of local businesses. Although the LTDA recognises that the interests of local stakeholders must be considered in conjunction with those of other Londoners and visitors to the area, the interests of local residents and businesses must not be ignored and ought to be afforded the highest priority, since they stand to be affected most by the proposals. Since the proposals presented to the public in the second round of consultation appear not to have a support base amongst local stakeholders, the LTDA would question whether their views have been properly taken into account.

Moreover, the LTDA is concerned that the piecemeal nature of the development of the proposals makes proper scrutiny of the plans very difficult and obscures the full impact of transforming Oxford Street. By drawing up and modelling proposals for Oxford Street West separately to those for Oxford Street East, the LTDA believes that the full impact is not being measured and that the consequences cannot be assessed. The LTDA believes that the likely impacts of the transformation of Oxford Street are not fully shown in the factsheets produced by Transport for London and Westminster City Council, and are likely to be significantly more harmful than is claimed.

## Alternatives

The LTDA is of the view that there are numerous measures which should be explored before the significant reduction of vehicles on Oxford Street is considered. These alternatives, if enacted, would provide a better balance between the needs of Oxford Street visitors and local residents, as well as pedestrians and other road users. Our preferred alternatives, following consultation with our members, are the following:

- Amending the existing layout of Oxford Street to permit one-way travel down the street, coupled with in-loops to restrict through traffic;
- Permitting only taxis to access Oxford Street;
- Permitting only electric or carbon-neutral taxis to access Oxford Street;
- Greater restrictions non-public forms of transportation on Oxford Street, such as private vehicles, freight and private hire vehicles (PHVs);
- Introducing a mezzanine deck above Oxford Street with full pedestrian access, allowing access to the main shops both at that level and on the ground;
- Greater enforcement of pre-existing regulations on traffic and private vehicle access;
- Better co-ordination of construction and servicing vehicles;
- Permitting taxi access to Oxford Street during the night-time when pedestrian footfall is lower;
- Introducing more taxi ranks.

### Taxi access only

Retaining Oxford Street West vehicle movements solely for licensed taxis would significantly reduce the overall number of vehicles travelling along Oxford Street West, thereby improving the pedestrian and user experience and allowing for improvements to be made to the public realm, in line with TfL's



and Westminster City Council's ambition to improve the "look and feel" of Oxford Street. Further, this would mean that door-to-door access for users of the streets would be retained, reducing the demand on local taxi ranks and limiting the impacts on local residents and businesses. Finally, this would mean that the harmful equalities impacts already identified would be significantly mitigated, as a safe and convenient form of transport for disabled and mobility-restricted road users would be retained.

### **Electric taxi access only**

The LTDA would support the option not yet considered by TfL and Westminster City Council to retain access to Oxford Street West for electric or zero-emissions capable taxis. This would significantly reduce air pollution and potentially the noise associated with internal combustion engines. The benefits outlined above would also accompany this option.

### **Introduction of a mezzanine deck**

The LTDA believes that the erection of a mezzanine deck above Oxford Street would provide a fair balance between the needs of different road users and allow for an enhanced pedestrian experience which does not come at the expense of vehicular movement. A mezzanine deck above Oxford Street with full pedestrian access would allow pedestrians to access Oxford Street without inhibiting traffic flow below, working in a similar way to a shopping centre or other major retail destination.

### **One-way operation**

Amending the layout of Oxford Street to make the street one-way for traffic would significantly improve the pedestrian experience on Oxford Street by reducing noise and pollution, and if coupled with restriction of vehicle access to taxis would reduce the impact thereof. An initial option to retain a single-lane, one-way corridor along the length of Oxford Street West, or to create a loop for taxis to minimise through traffic, would be preferable. To ensure that this is most effective, this could be based upon the most popular destinations on Oxford Street. Reducing the amount of road space for vehicles would still allow a significantly enhanced public realm and pedestrian experience, all the while retaining door-to-door access for those who require it.

### **Night-time access**

The LTDA would welcome the opportunity to discuss in further detail the option of permitting taxi access to Oxford Street during the night-time. It is the experience of our members that many passengers enjoying destinations in areas to the north and south of Oxford Street visit Oxford Street to return home, owing to the ease of finding a taxi- or indeed a bus- that travels through the street. If that activity is to be transferred to neighbouring streets such as Wigmore Street, this will have two distinct negative consequences. Firstly, there will be greater disturbance to residents during the evening and early hours of the morning, with possible antisocial behaviour implications accompanying this. Secondly, it will be harder for visitors to these destinations to travel home via a taxi, resulting in a loss of a convenient, safe and accessible journey home. It is the LTDA's view that allowing night-time access to Oxford Street would be beneficial to both residents in and visitors to the wider Oxford Street district.

## **Conclusion**

The proposed pedestrianisation of Oxford Street West will have significant impacts on the licensed taxi trade which threaten the viability of the trade and the public transport network as a result. The





impacts will also be felt on local user groups, including the most vulnerable road users. The aims of this report are not to undermine the proposals but to seek clarity on the impacts and identify where these are likely to be negative, or to suggest alternative options. The LTDA looks forward to discussing the proposed alternatives in greater detail, and to continuing its fruitful dialogue with TfL, Westminster City Council and other stakeholders.

Finally, the LTDA notes that the cumulative effect of wider measures in the West End, such as the West End Project and associated enabling works such as the Tavistock Place/Torrington Place, will be to cause substantial disruption to the traffic network in the area. We are concerned that a holistic approach which considers the likely impact of the various measures taken together has not been adopted, and consequently, travel in the West End will be made incredibly difficult. Any measures aimed at improving the look and feel of Oxford Street must bear in mind future changes in the transport network, and must not come at the expense of the environment in the West End as a whole.



Richard Massett

Chairman of the Licensed Taxi Drivers' Association