

Have your say on the transformation of Oxford Street Response by New West End Company

Executive Summary

Stage One - Oxford Street West (Oxford Circus to Orchard Street transition scheme)

- 1. New West End Company and our 600 members supports the Mayor's proposals for the transformation of the Oxford Street district and his preferred option for the first stage, i.e. traffic free east-west, but with north-south routes remaining open. This reflects our recommendation in our response to the first phase of consultation. In particular, we believe that:
 - The Transformation should be of the entire length of Oxford Street, from Tottenham Court Road to Marble Arch;
 - The traffic free areas should be closed for just 12 hours from 10.00 to 22.00 to allow for servicing;
 - The integrity of Oxford Circus, in its design and symmetry, should be maintained with public realm work undertaken on the western side matched on the eastern side in stage one;
 - Closure of west Oxford Street to traffic should provide an opportunity to reduce traffic and increase pedestrian space on Regent Street;
 - A well-resourced, robust and strongly enforced management plan should be in place in time for the completion of stage one.
- 2. The consultation seeks views on closing Oxford Street to traffic for 24 hours or 12 hours (from 10.00 to 22.00). New West End Company's preferred option is for a time closure i.e. 12 hours, allowing deliveries to take place in the remaining 12 hours.
- 3. We understand the concerns of Transport for London (TfL) and Westminster City Council (WCC) about the impact the 12-hour option could have, both on the design of the pedestrianised area and security. However, we believe that these concerns are overridden by the need to service commercial buildings efficiently and the additional benefits of night-time management. We note that there will need to be access for emergency and cleansing vehicles even under the 24 hour proposals which will anyway impact on the design. We also believe that the possibility of any hostile vehicle attacks (HVMs) are unlikely to take place between 22.00 and 10.00 when there are few pedestrians on the street (although we accept that this could change if an evening economy is promoted).

- 4. We note that the consultation states that the transition scheme is an opportunity to pilot elements in advance of the full transformation scheme. We suggest that the 12-hour option is piloted during the transition scheme and the impact monitored to inform the transformation scheme.
- 5. We are pleased that the preferred option addresses the following issues which we raised in our earlier response:
 - Transformation of the space to be of a high standard, requiring planning guidelines, and animation of the street and side streets;
 - Work required on certain streets and junctions outside the immediate Oxford Street area to enable them to accommodate traffic movement and to provide space for taxis, buses and delivery vehicles to operate;
 - Recognition of the need to develop a robust, well-resourced and strongly enforced management plan which we believe needs to be in place by the time the stage one is complete;
 - Cycling not allowed on the traffic free areas this should include pedicabs;
 - Some form of surface level east-west public transport should be provided along Oxford Street during 10am and 10pm, but in ways that do not interfere with pedestrian priority. This would assist visitors who are elderly, disabled or simply do not wish to walk the full length of Oxford Street.
- 6. However, we wish to ensure that:
 - The entire street, from Tottenham Court Road to Marble Arch, is transformed. We are concerned at the relative lack of commitment to stage three of the transformation, from Oxford Street to Marble Arch;
 - The western end of Oxford Street, from Orchard Street to Marble Arch, while remaining open to traffic until stage three, is integrated into the start of the pedestrianised area with doorway renewal, widening, animation and art, so that a psychological barrier to pedestrians is not created to the detriment of retailers in this area;
 - Regent Street is an integral part of the transformation programme. In particular:
 - It would not be acceptable to increase traffic on Regent Street as part of a scheme for a traffic-free Oxford Street. We believe that the reduction of bus routes and the first stage of closure of west Oxford Street to traffic provides opportunities to remove some of the existing carriageway, while retaining bus priority, to create more pedestrian space on Regent Street. This would be consistent with the policies of the draft Mayor's Transport Strategy.
 - The integrity of Oxford Circus, in its design and symmetry, serving as a major gateway
 to the West End, should be maintained throughout. Public realm works undertaken
 on the western side should be matched to the eastern side as part of stage one. This
 would also encourage footfall onto Regent Street.
 - All public realm works should be of a quality that reflect and enhance the position of the West
 End as world class shopping and commercial district;
 - Additional traffic-free activities on other streets should also be considered, such as the events currently staged on Regent Street. We believe, for example, that there is demand and scope for more traffic-free days in the West End without the need for supporting events as a way of monitoring the impact on air pollution;

- The design takes account of the need to tackle crime, for example, we would not want a pedestrianised area to provide an escape route for moped criminals.
- 7. New West End Company surveyed our 600 business members asking whether they supported our main recommendations. The results show strong support for each recommendation:
 - 82% support proposals for the transformation of Oxford Street and the preferred option for the first stage, i.e. traffic-free east-west, but with north-south routes remaining open;
 - 80% prefer closure from 10.00-22.00 rather than 24 hrs, to enable servicing of businesses from Oxford Street;
 - 96% believe that transformation of the space should be to a high standard, requiring planning guidelines and animation of the street and side streets;
 - 97% believe that there is need for a robust, well-resourced and strongly enforced management plan;
 - 82% believe that the entire street, from Tottenham Court Road to Marble Arch, must be transformed;
 - 83% believe that Regent Street should feature as an integral part of the transformation programme. In particular, it would not be acceptable to increase traffic on Regent Street as part of a scheme for a traffic-free Oxford Street.
- 8. We have, in Appendix 1, produced responses relating to detailed issues for each of the major zones in the Stage One proposed area.

Oxford Street East - Initial Views

- 9. The principles we have outlined for West Oxford Street (e.g. traffic removal, public realm improvements and management), are the same that we would apply to Oxford Street East.
- 10. We appreciate that the areas north and south of Oxford Street are different for the east and west elements and that this provides challenges for the delivery of a coherent, district-wide project. We look forward to working with Transport for London and Westminster City Council to address these in ways that meet the requirements of businesses, residents and traffic management across the district's distinct neighbourhoods.
- 11. In our survey, 85% of respondents believe that the principles New West End Company have outlined for West Oxford Street (i.e. east-west traffic removal, north-south routes remaining open, public realm improvements and high-quality management) are the same that they would want applied to Oxford Street East

Funding and Growth

- 12. In our response to the first consultation, we highlighted the growth-limiting issues that need to be addressed to achieve the full and successful transformation of Oxford Street. These are attached as Appendix 2.
- 13. We appreciate that these growth-limiting issues will be addressed in future, related consultations. However, we believe that growth and the additional value it produces for the wider West End is key to securing the finance required to deliver the transition scheme to the desired quality.

14.	The Government had not yet agreed to The West End Partnership TIF bid and while we support Westminster City Council in its promotion of this bid, we believe, given the very short timescale and the political commitment to delivering this transformation, we need to explore other ways of financing the project.

Have your say on the transformation of Oxford Street Response by New West End Company

1. Introduction

- 1.1 New West End Company welcomes the opportunity to contribute to the "Transformation of Oxford Street" consultation being undertaken by Westminster City Council (WCC) and Transport for London (TfL).
- 1.2 New West End Company supports the Mayor's proposals for the transformation of the Oxford Street district and his preferred option for the first stage, i.e. traffic free east-west but with north-south routes remaining open. This reflects our recommendation in our response to the first phase of consultation. In particular, we believe that:
 - The Transformation should be of the entire length of Oxford Street, from Tottenham Court Road to Marble Arch;
 - The traffic free areas should be closed for just 12 hours from 10.00 to 22.00 to allow for servicing;
 - The integrity of Oxford Circus, in its design and symmetry, should be maintained with public realm work undertaken on the western side matched on the eastern side in stage one;
 - Closure of west Oxford Street to traffic should provide an opportunity to reduce traffic and increase pedestrian space on Regent Street;
 - A well-resourced, robust and strongly enforced management plan should be in place in time for the completion of stage one.

New West End Company

- 1.3 New West End Company is the Business Improvement District (BID) for the major shopping streets of London's West End. Comprising an Occupier BID and a Property Owner BID, we represent over 600 retail, hotel and property companies in and around Bond Street, Oxford Street and Regent Street. We are a leading business voice for London's West End.
- 1.4 New West End Company has worked closely with WCC and TfL over twelve years to promote the growth of the West End and to address many of the issues that the district faces. In particular, we three organisations are all members of the West End Partnership (WEP) which brings together representatives of all the major communities and interested parties in the West End, to plan for its successful and sustainable growth.

Scope and structure of our response

1.5 In our response to the first round of consultation, launched in April 2017, we noted that, while WCC and TfL's vision for Oxford Street applies to its entire length, that particular consultation related to the transformation of that section of Oxford Street between Orchard Street and Oxford Circus. Our response covered that section but our recommendations also related to the wider context of the whole Oxford Street district and the wider West End. The same applies in our response to this second round consultation.

- 1.6 We have structured our response in four sections. First, we examine the context and issues. Then we respond to Question One, focusing on the stage one transition proposals for part of West Oxford Street. We then respond to Question Two, giving our general views on the transformation of East Oxford Street. Finally, we look at growth enhancement measures as a way of funding for the full transformation.
- 1.7 In responding to Question One, we first provide our view on the broad principles and issues relating to the stage one transition. We then provide detailed responses for each zone of the Oxford Street West transition area and those other zones affected by these works. These have been compiled in collaboration with owners and occupiers in each zone.
- 1.8 In particular, we include comments on the impact of stage one of the transition on the areas immediately to the East (Oxford Circus and Regent Street) and the West (from Orchard Street to Marble Arch) as it is important to ensure that there is, at the very least, no negative impact on these important elements of the West End.
- 1.9 We appreciate that this second stage consultation focuses on the traffic management and public realm elements of the transformation of the Oxford Street district. We note that the foreword to this consultation acknowledges the wider growth-enhancing elements required to maximise the benefits of the Elizabeth Line opening in late 2018 and states that these will be addressed in future consultations, particularly in the forthcoming revision of the London Plan and the City Plan. However, for consistency and to stress our firm belief that these growth-enhancing policies are integral to the transformation of the Oxford Street district, we include a discussion of these issues as an appendix to this response.
- 1.10 The need to finance the full transformation scheme and ongoing management to meet the requirements of a world-class shopping, entertainment and commercial district and to maximise the returns on the investment in the Elizabeth Line suggests that promoting and using the proceeds of growth is central to delivering the transformation of the Oxford Street district.

How we have developed our response

- 1.11 New West End Company has welcomed and supported developments and growth plans for the West End. In particular, through the WEP, we have supported a vision for the West End that takes account of major changes, particularly the opening of the Elizabeth Line in 2018 and the forecast population growth of London, to ensure that the West End is prepared for and maximises the benefits from the expected visitor and employment growth in the district. This includes the sufficient provision of commercial space, the safe and comfortable accommodation of significantly larger numbers of people on our streets and the retention of heritage and residential elements in order to ensure that the West End remains one of the world's best places to live, work, invest and visit.
- 1.12 We believe that the opening of the Elizabeth Line, and the investment required to support it, provides a once-in-a-lifetime opportunity to take a longer-term view of the West End's future and the measures needed to secure it. This goes beyond the transport and public realm improvements needed to accommodate additional visitors. It should also look at the policies and investments that will enable the West End to grow in ways that reflect and respond to the development of international shopping and entertainment centres worldwide.

- 1.13 Plans to remove most or all of the traffic from Oxford Street, will reassert the primacy of this iconic street as an economic zone rather than a local traffic corridor. The opportunities caused by this transformation, if seized by the public and private sectors, can create thousands of new jobs, generate millions of pounds of extra turnover and produce significant additional income for Westminster City Council and the Mayor to spend on their local priorities.
- 1.14 In 2015, New West End Company commissioned an extensive study of the Oxford Street district combining the expertise of Publica (urban design and public realm consultants), Gerald Eve (international property consultants) and Volterra (economic consultants). Over a two-year period, these consultancies have worked together to demonstrate the need for a bold, holistic aspiration for the future of the Oxford Street district and to suggest the principles for action and financing initiatives that will be required to deliver that aspiration.
- 1.15 Launched at the London Real Estate Forum in June 2017, this study has provided the evidence base for the creation of a strong, clear and deliverable aspiration for the Oxford Street district. The aim of this aspiration is to inspire all West End and London stakeholders to support an ambitious and holistic vision for the Oxford Street district, for the benefit of all local communities, whether these be businesses, employees, residents or visitors. It aims to demonstrate how the once-in-a-generation opportunity offered by the opening of the Elizabeth Line could create, over time, a renaissance for this major shopping street, to halt its decline and establish it as a significant positive contributing area, helping to secure the wider West End's future as a global shopping, entertainment and commercial district, and one in which it is a pleasure to live.
- 1.16 This study also informs New West End Company's response to the current consultation and it will be referenced throughout. The study and supporting evidence base are available on our dedicated Oxford Street district website www.oxfordstreetdistrict.com The Business Study comprises two distinct elements an evidence base called "Oxford Street Today" and a document, "A future for the Oxford Street district", which uses that evidence to suggest what a new Oxford Street district could look like. "Oxford Street Today" is supported by a series of appendices on the economic performance of the district and the relevant planning policies that currently determine future development in the district and their implications on its future growth.
- 1.17 Our responses to the specific issues raised in the "Transformation of Oxford Street" consultation paper is based on our study for the future of the Oxford Street district. The recommendations we make in this document would enable a shared aspiration for the future of the Oxford Street district to be supported and practically delivered by public and private sector partners.
- 1.18 During the consultation period, we have sought the views of West End business, employees, visitors and residents on our proposals to help inform our response and measure the level of support for our recommendations. In particular, we have:
 - Hosted an Oxford Street summit in partnership with Westminster Property Association and attended by the Deputy Leader of Westminster City Council, the Deputy Mayor for Transport and representatives of TfL attended by over 150 Senior business representatives;
 - Held two business workshops, attended by over 30 West End businesses;
 - Held workshops for each of the zones within the stage one area to consider local detailed issues;

- Created and promoted a dedicated Oxford Street transformation consultation micro-site
- Met local resident groups;
- sought input to and comments on our response from our Board, Property Steering Group and key stakeholders;
- Tested our key recommendations with our members in an online survey.
- 1.19 New West End Company recognises that the unique strength and appeal of the West End is the substantial mix of world-class retail, leisure and entertainment facilities in a district that has retained its character as it has evolved and which contains a strong and thriving residential community, contributing additional life and character. Our recommendations and our aspiration reflect the value of this diversity and seek to enhance each aspect and use in the West End.
- 1.20 We are very sensitive to the interests of local residents in the West End. New West End Company has developed strong and productive relationships with all the key community groups and our senior staff members play active roles on four West End Neighbourhood Forums. We work together with local resident representatives as fellow members of the West End Partnership. We firmly believe that businesses and residents share many of the same benefits from a thriving West End, as well as the desire to improve its overall economic, built and natural environments. A thriving West End with constant new investment and the addition of innovative experiential retail, culture and entertainment to an already world-class district makes it a wonderful place to live. But together we need to tackle problems of air pollution, congestion, a poor quality public realm and overcrowded streets in order to provide benefits for residents as much as businesses and visitors. We are aware of issues that cause particular concerns to residents and so we do not, for example, support a late night economy in the district. We work to ensure that Sunday mornings remain peaceful and calm and we argue that traffic reduction on the main shopping streets should not be achieved by redirection through residential streets but through a genuine reduction in bus routes through the West End.

2. Context and issues

2.1 In this section we outline the context for our responses, based on our Business Study. First we look at the current state of the Oxford Street district within the global shopping and commercial context. Then we examine the specific challenges faced by the district. These are the issues that our response seeks to highlight and recommends that WCC and TfL should address.

Oxford Street today

- 2.2 Alone, as a single, relatively monocultural retail street, Oxford Street cannot continue to compete with modern shopping malls and town centre retail destinations which offer better integrated retail, entertainment and leisure experiences for visitors. In addition, the growth of online retailing means that major shopping districts must offer visitors an experience that is more than just shopping to provide a distinctive appeal to current and future shoppers.
- 2.3 Oxford Street has for some time being showing signs of decline both in terms of its physical appearance and its attractiveness to shoppers. Footfall is in decline, particularly in the western section of the street. Surveys of visitors' point to concerns about the poor quality public realm, overcrowding of pavements, traffic congestion, lack of cleanliness, a poor food and drink offer,

and a lack of amenities such as public toilets and places to sit.¹ Oxford Street's decline comes at a time when other regional and global shopping centres are growing and providing shoppers with high quality facilities.

- 2.4 But if Oxford Street were to be considered part of a diverse district, better integrated into the wider West End, it could provide a unique wealth of retail, offices, amenity, homes, culture and leisure. This would ensure that it delivers economic growth, responds to emerging trends in retail and working, capitalises on the opening of the Elizabeth Line in 2018, and captures opportunities to offer an unparalleled shopping experience for Londoners and visitors in years to come.
- 2.5 The Crown Estate's ongoing transformation of Regent Street has demonstrated what can be achieved when there is a clear vision for the shape, style and content of a major London shopping street. We believe that a similar, wide-ranging vision should be adopted and delivered for the Oxford Street district.

Challenges

- 2.6 Like much of the rest of the West End and London, the Oxford Street district is facing a number of challenges today. These challenges currently prevent the district from realising its full potential. If they are addressed however, the Oxford Street district's economic performance, its identity and position as one of the world's leading retail and business destinations, and the wellbeing of all who visit, live and work here will be enhanced and safeguarded for the future.
- 2.7 New West End Company has identified two groups of challenges for Oxford Street. The first group contains wellbeing challenges for visitors, employees and residents and the second group refers to growth-limiting challenges.

Wellbeing challenges

Oxford Street suffers from high levels of vehicle traffic and congestion. This creates major well-being challenges that detract from the district's appeal for residents, visitors and investors.

- Very poor air quality in part due to the high number of buses on Oxford Street, local pollution rates are three times higher than the legal limit set by the EU, and annual limits for nitrogen dioxide emissions are typically breached within the first few days of each new year.²
- Poor road safety research by the Department of Transport published in 2015 cites Oxford Street as being the location of three of the top ten accident hotspots in the country.³ All of these are on the western section of Oxford Street.
- Inadequate public realm in 2013 a report by the Roads Task Force stated that "traffic movement (on Oxford Street) conflicts with the place functions for visitors and shoppers, contributing to high levels of pedestrian crowding on footways". Poor quality public realm and limited amenities mean that the current pedestrian environment is no longer sufficiently

¹ Oxford Street Today page 60

² Oxford Street Today page 67

³ Oxford Street Today page 73

⁴ Oxford Street Today page 125

safe or pleasant for visitors to the district and connections between the street and its surroundings are often unclear. There is limited opportunity to choose the healthy travel options championed in the Mayor's draft Transport Strategy.

Growth-limiting challenges

Simply providing a new transport link, in the form of the Elizabeth Line and undertaking transport and public realm improvements to accommodate new visitors does not in itself guarantee the future success of a district. To maximise the impact of these significant transport investments we need to ensure that the district is able to function optimally and grow in ways that are appropriate to its heritage and mix of uses but which reflect the requirements of a global shopping and commercial district. We have identified two key challenges to successful economic growth.

- A shortage of commercial workspace -the Oxford Street district and the wider West End face an employment floorspace capacity shortfall that will, without intervention, weaken London's competitiveness, and hamper WCC's ambitions to create 77,000 new jobs in the borough by 2036. The Elizabeth Line will be a key commuter line into central London and we need to ensure that there is the commercial space available to accommodate new and growth businesses
- **Evolving retail trends and fierce global competition** in an age of online shopping, high street retail is increasingly moving away from traditional commerce, towards leisure, entertainment and experience. Oxford Street's competitors both within London and further afield are better at meeting the needs of future shoppers by providing more attractive shopping destinations.
- 2.8 The well-being challenges will soon get far worse if nothing is done. The opening of the Elizabeth Line in 2018 is expected to bring an additional 60 million people to the West End each year by 2020, contributing nearly a third more than the current 200 million annual visits. In addition, London's population is forecast to grow from 8.6 million today to over 10 million in 2031. The current Oxford Street district will not support these significant increases in visitor numbers safely and comfortably.
- 2.9 With increasing global competition the West End needs to be enabled and encouraged to respond to evolving shopping trends. The growth-limiting challenges prevent Oxford Street and the wider West End from reaching its economic potential for the benefit of the wider district, London and the UK. WCC has set ambitious growth and job creation targets and to achieve them we believe that these growth-limiting challenges need to be addressed.

3. Q1 "Do you support our proposals for the transformation of Oxford Street?"

3.1 New West End Company fully supports the transformation of Oxford Street but in ways that will address the well-being and growth-limiting challenges. In this response we first provide general comments relating to the entire transition scheme. We then provide detailed comments relating to specific zones, as a separate appendix.

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⁵ TfL consultation "Transforming Oxford Street"

General response

The need for large-scale traffic reduction in the West End

- 3.2 Since its formation, New West End Company has campaigned for significant reduction in traffic in the West End. We believe that this would be one of the most important improvements to the West End. Current congestion leads to -
 - Very poor air quality
 - Poor road safety at certain junctions
 - Pavements that are unsafe and uncomfortably crowded at peak shopping times due to lack of additional space
- 3.3 West End businesses are concerned that, over time, this level of congestion and the problems caused by it will lessen the West End's attractiveness to residents, visitors, investors and businesses. It will also make the district a less pleasant place in which to live and work. In September 2016 the Chair of the London Assembly Transport Committee wrote to the Mayor saying "Oxford Street is currently a dangerous and dirty destination for pedestrians in the capital with poor air quality and high numbers of casualties. Something's got to give and it's got to give now. Without significant change to make the area cleaner and safer for Londoners and visitors to the city, the global reputation of Oxford Street is at risk".
- 3.4 Despite marginal changes aimed at relieving the volume of traffic in the West End (e.g. the previous Mayor's commitment to a 10% reduction in bus travel on Oxford Street each year for three years and the introduction of freight and waste consolidation schemes by The Crown Estate on Regent Street and New West End Company on Bond Street) the practical impact has been very limited. Traffic congestion is still a major problem in the West End.
- 3.5 In 2010 the London Assembly's Transport Committee concluded, in its report "Streets Ahead: Congestion on Oxford Street, Regent Street & Bond Street", that "various schemes to reduce traffic congestion and improve the pedestrian experience in one of the world's premier shopping destinations may not be enough, prompting a call for more radical thinking. At the heart of the problem is the conflict between the need to provide a pleasant shopping and leisure environment, and meeting the demand for transport links through the West End".
- 3.6 New West End Company has been particularly concerned about the number of buses that use Oxford Street as an east-west link road and which, outside commuter hours, are often largely empty. On average there are 18 passengers on each bus on Oxford Street, indicating that these buses are not operating at efficient carrying capacity⁶. We do not believe that these near-empty buses effectively serve West End residents, shoppers or employees. We have argued that the West End, as a designated International Shopping Centre in the Mayor's London Plan and zoned as the West End Special Retail Policy Area in WCC's City Plan, should prioritise the interests of shoppers, but until recently these appear to be secondary to the interests of terminating bus routes.
- 3.7 New West End Company therefore welcomes the Mayor's recent announcement (April 2017) of a 40% reduction in bus routes on Oxford Street.⁷ We are particularly pleased that this will be

⁶ Oxford Street Today page 69

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⁷ TfL press release "TfL confirms changes to bus routes in central London" April 17th 2017

- achieved by removing unnecessary bus routes from the West End rather than by diverting them off the main shopping streets onto nearby residential streets.
- 3.8 While traffic reduction in the West End is important currently it will become an imperative when the Elizabeth Line is opened in late 2018. Streets that are currently crowded with the 200 million people who visit the area each year will have to accommodate an estimated additional 60 million people each year. We therefore support the consultation's proposals for creating a traffic-free element to Oxford Street made possible by large-scale reduction in bus routes into the West End, not by the redirecting of current routes through nearby residential streets. We are pleased that the Mayor has turned this manifesto commitment into a policy priority.

Requirements for traffic reduction on Oxford Street

- 3.9 In considering traffic reduction in the West End and traffic-free options for Oxford Street, New West End Company suggests the following elements are required:
 - traffic reduction in the West End must be achieved by a genuine reduction throughout the
 West End and not through large scale redirection of traffic onto side streets;
 - all proposals for traffic-free options must be accompanied by an economic impact study to assess how each will affect West End businesses, not just in Oxford Street but on the other main shopping streets, so that any chosen proposal enhances retail performance on Oxford Street and the wider West End;
 - any proposal must allow businesses to operate effectively;
 - any proposal must enhance the experience for visitors, employees and residents;
 - any proposal must include long-term maintenance and management schemes for the traffic free areas.

Elizabeth Line opening position

- 3.10 The Elizabeth Line is scheduled to open in the West End in December 2018. New West End Company has defined three key changes that we believe should be made by the time that the West End stations on the Elizabeth Line open. These are:
 - at least a 50% reduction in traffic entering Oxford Street and Regent Street;
 - removal of the worst polluting vehicles from our streets and an ambition for all public transport and, where possible, service vehicles entering the area to use only electric power;
 - an accelerated introduction of the Ultra-Low Emission Zone.

Traffic-free options

3.11 The Mayor committed in his manifesto to the pedestrianisation of Oxford Street, stating that one of his 10 priorities was to "restore London's air quality to legal and safe levels, with action to make travel greener and pedestrianise Oxford Street.". 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

⁸ A Manifesto for all Londoners 2016

- streets into one of the world's finest public spaces a tree-lined avenue from Tottenham Court Road to Marble Arch."
- 3.12 New West End Company welcomes this commitment but realises that there are a number of ways to deliver a traffic free Oxford Street based on the physical extent of the traffic-free area and the timing of it.
- 3.13 We strongly support the preferred option for stage one traffic free east- west but with north-south routes remaining open. This reflects our recommendation in our response to the first phase of consultation.
- 3.14. The consultation seeks views on closing Oxford Street to traffic for 24 hours or 12 hours (from 10.00 to 22.00). New West End Company's preferred option is for a 12-hour closure, allowing deliveries to take place in the remaining 12 hours.
- 3.15 We understand the concerns of TfL and Westminster City Council about the impact this could have both on the design of the pedestrianised area and security. However, we believe that these are overridden by the need to service commercial buildings efficiently and the additional benefits of night-time management. We note that there will need to be access for emergency vehicles even under the 24 hr proposals which will anyway impact in the design. We also feel that HVMs are unlikely to take place between 22.00 and 10.00 when there are few pedestrians on the street (although we accept that this could change if an evening economy is promoted).
- 3.16 We note that the consultation states that the transition scheme is an opportunity to pilot elements in advance of the full transformation scheme. We suggest that the 12-hour option is piloted and the impact monitored.
- 3.17 We are pleased that the preferred option addresses the following issues that we raised in our earlier response:
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 - Work required on certain streets and junctions outside the immediate Oxford Street area to enable them to accommodate traffic movement and to provide space for taxis, buses and delivery vehicles to operate;
 - Recognition of the need to develop a robust, well-resourced and strongly enforced management plan which we believe needs to be in place by the time the stage one is complete;
 - Cycling not allowed on the traffic free areas this should include pedicabs;
 - Some form of surface level east-west public transport should be provided along Oxford Street during 10am and 10pm, but in ways that do not interfere with pedestrian priority. This would assist visitors who are elderly, disabled or simply do not wish to walk the full length of Oxford Street.
- 3.18 However, we wish to ensure that:
 - The entire street, from Tottenham Court Road to Marble Arch, is transformed. We are concerned at the relative lack of commitment to stage three of the transformation, from Oxford Street to Marble Arch;

- The western end of Oxford Street, from Orchard Street to Marble Arch, while remaining open to traffic until stage three, is integrated into the start of the pedestrianised area with doorway renewal, widening, animation and art so that a psychological barrier to pedestrians is not created to the detriment of retailers in this area;
 - Regent Street is an integral part of the transformation programme. In particular:
 - It would not be acceptable to increase traffic on Regent Street as part of a scheme for a traffic-free Oxford Street. We believe that the reduction of bus routes and the first stage of closure of west Oxford Street to traffic provides opportunities to remove some of the existing carriageway, while retaining bus priority, to create more pedestrian space on Regent Street. This would be consistent with the policies of the draft Mayor's Transport Strategy;
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 to the West End, should be maintained throughout. Public realm works undertaken
 on the western side should be matched the eastern side as part of stage one. This
 would also encourage footfall onto Regent Street;
- All public realm works should be of a quality that reflect and enhance the position of the West
 End as world class shopping and commercial district;
- Additional traffic-free activities on other streets should also be considered, such as the events currently staged on Regent Street. We believe, for example, that there is demand and scope for more traffic-free days in the West End, which can also be good for reducing demand for car trips and pollution;
- The design takes account of the need to tackle crime, for example we would not want a pedestrianised area to provide an escape route for moped criminals.
- 3.19 New West End Company surveyed our 600 business members asking whether they supported our main recommendations. The results show strong support for each recommendation:
 - 82% support proposals for the transformation of Oxford Street and the preferred option for the first stage, i.e. traffic-free east-west but with north-south routes remaining open;
 - 80% prefer closure from 10.00-22.00 rather than 24 hrs, to enable servicing of businesses from Oxford Street;
 - 96% believe that transformation of the space should be to a high standard, requiring planning guidelines and animation of the street and side streets;
 - 97% believe that there is need for a robust, well-resourced and strongly enforced management plan;
 - 82% believe that the entire street, from Tottenham Court Road to Marble Arch, must be transformed;
 - 83% believe that Regent Street should feature as an integral part of the transformation programme. In particular, it would not be acceptable to increase traffic on Regent Street as part of a scheme for a traffic-free Oxford Street.

Detailed Zone-specific responses

- 3.20 The consultation document makes a series of detailed proposals for the delivery and operation of stage one. In particular, it seeks views on:
 - Walking on Oxford Street west and in the surrounding district;
 - Buses on and around Oxford Street west;
 - Improvements in the Oxford Street district;
 - Taxis and private hire vehicles on Oxford Street;
 - Deliveries and servicing;
 - Impacts on traffic and the environment;
 - Impacts on accessibility.
- 3.21 Our response thus far has provided our strategic position to these issues. To explore them in detail New West End Company organised a series of workshops with property owners and occupiers in each of the zones that make-up the stage one area. These workshops examined the specific local operational issues and provided comment and recommendations. The results of these workshops are included in this response as **Appendix 1**.
- 4. Q2. "We have explained that we will develop proposals for the section of Oxford Street between Oxford Circus and Tottenham Court Road based on the issues of concern raised by respondents to our last consultation, which includes concerns about traffic displacement, access by public transport and the management of the area. If you believe there are any other issues we should take into account in developing proposals for the eastern section of Oxford Street, or have any comments about this issue, please record them below.
- 4.1 Our response to the first consultation, reflected in this response, related to the entire length of Oxford Street. The principles we have outlined for West Oxford Street (e.g. traffic removal, public realm improvements and management) are the same that we would apply to Oxford Street East.
- 4.2 We appreciate that the areas north and south of Oxford Street are different for the east and west elements and that this provides challenges for the delivery of a coherent, district-wide project. We look forward to working with TfL and Westminster City Council to address these in ways that meet the requirements of businesses, residents and traffic management across the district's distinct neighbourhoods.
- 4.3 According to our survey, 85% of respondents believe that the principles New West End Company have outlined for West Oxford Street (i.e. east-west traffic removal, north-south routes remaining open, public realm improvements and high-quality management) are the same that they would want applied to Oxford Street East.

5. Funding and growth

5.1 In our response to the first consultation we highlighted the growth-limiting issues that need to be addressed to achieve the full and successful transformation of Oxford Street. These are attached as Appendix 2.

- 5.2 We appreciate that these will be addressed in future, related consultations. However, we believe that growth and the additional value it produces is key to securing the finance required to deliver the transition scheme to the desired quality.
- 5.3 The Government had not yet agreed to the WEP TIF bid and, while we support Westminster City Council in its promotion of this bid, we believe, given the very short timescale and the political commitment to delivering this transformation, that we need to explore other ways of financing the project. We are discussing funding options with WCC and TfL.

Jace Tyrrell
CHIEF EXECUTIVE

January 2018

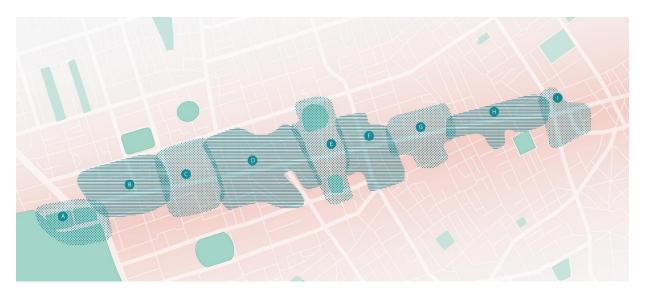
Appendix 1

Detailed responses for each zone in stage one

The following pages capture the comments made by local business stakeholders on the Westminster City Council (WCC) and Transport for London (TfL) proposals for the transformation of Oxford Street west (November 2017). These comments were recorded at a workshop organised by NWEC that took place on 30th November 2017 and also in one-to-one meetings with The Crown Estate, The Grosvenor Estate, The Howard de Walden Estate, Selfridges, St Christopher's Place and the John Lewis Partnership. The workshop was an opportunity for the stakeholders to discuss public realm and transport design concerns and to develop a zone-specific response to the second round of the WCC/TfL consultation.

The views expressed here are those of participants in the workshops and individual views may not always correspond to those of the New West End Company Board.

In order to facilitate meaningful conversations and capture a range of comments in relation to the entire Oxford Street district, the workshop was split into three sessions using the zones identified in 'A Future for the Oxford Street district' (June 2017). That vision document summarises aspirations of the local business community for the district. The zones are shown on the map below.



ZONE A - MARBLE ARCH

ZONE B - MARBLE ARCH TO ORCHARD STREET

ZONE C - ORCHARD STREET, SELFRIDGES TO BIRD STREET

ZONE D - BIRD STREET TO DERING STREET

ZONE E - NEW CAVENDISH STREET TO HAREWOOD/HOLLES STREET TO JOHN PRINCES STREET

ZONE F - JOHN PRINCES STREET TO OXFORD CIRCUS TO GREAT PORTLAND STREET

Following the workshop and one-to-one meetings, comments were collated and distilled into the following note. Key themes were identified across all of the sessions, which have been highlighted and initial responses have been added. Within this note, these common themes are followed by zone specific stakeholder comments, on a street-by-street basis. Common concerns were raised across the three sessions and in different parts of the discussions, therefore are reported several times in this note.

GENERAL THEMES CONSISTENT ACROSS ALL ZONE SESSIONS

SCHEME EXTENTS

- The intention to transform the whole of the Oxford Street district to benefit shoppers, visitors and residents alike is welcomed by NWEC members.
- The level of ambition shown in the designs is welcome but can go even further in order to better reflect the aspiration of the district vision and the potential of a high profile, 'world class' scheme.
- The proposals for the streets off Oxford Street need to be developed in a way that maximises the scheme's true potential for the district as a whole.
- Key world-renown gateways, in particular Oxford Circus and Marble Arch, are either omitted from the proposals or worsened, therefore do not seize the potential of this moment. Consequently, this will lead to medium term and long term problems if the areas are not looked at again in a truly holistic manor.
- It is imperative that the stretch of Oxford Street west of Orchard Street (and its environs) is transformed from the outset as part of a single scheme, even if the traffic restrictions may differ to the spaces further east.

CLOSURE OF OXFORD STREET AND SERVICING

- Using Oxford Street's road-space flexibly and efficiently is consistent with the draft Mayor's Transport Strategy (Policy 4, p70).
- The character and activity of a pedestrianised Oxford Street (outside of the peak hours) needs to be fully explored and defined, and there is concern that a pedestrianised Oxford Street would suffer from a lack of activity and management.
- Outside of retail hours and times of busy pedestrian flows, access to parts of Oxford Street for essential services may alleviate the impact on side streets, therefore is consistent with taking a district-wide approach.
- A design solution for some over-night access can be tested in the transition phase and principles for its design can be drawn from places such as South Moulton Street and the southern part of Exhibition Road from South Kensington station, which mixes high pedestrian activity, street dining and service access.
- The optimal hours for timed vehicle access to Oxford Street may differ from the 10pm-10am option being discussed, and such hours should be reviewed and decided upon based on evidence of actual servicing demands and the aim of maximising the potential of an improved pedestrian and visitor experience of the Oxford Street district in the evening hours.
- Timed access may be most appropriate if it begins after 10pm and stops before 9am, to afford a pedestrian environment for later evening retail/ entertainment uses as well as the morning commuter rush hour (e.g. 11pm-8am).
- Allowing timed servicing (out of peak hours) on Oxford Street itself would allow for the commensurate 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.
- Allowing access to certain vehicles outside of busy pedestrian hours need not negatively impact the design ambition for Oxford Street as a whole, can have the same level of security as the rest of the district and achieve a hugely improved pedestrian and visitor experience both during the time in which vehicles are prohibited and overnight.
- The approach to servicing across the scheme needs to be consistent, ambitious and holistic across the entire district and does not put unnecessary pressure on the side streets in order to close Oxford Street at all times.
- There is a need for consistent management and kerbside controls across the district's streets, rather than different restrictions and times for each section. A consistent and coordinated approach to timing of servicing access will be easiest to manage, i.e. the same controls could be applied across timed vehicle access spaces (e.g. Oxford Street/ James Street southern section/ Tenterden Street). This would also limit signage and therefore street clutter.

MAINTENANCE AND MANAGEMENT

- A detailed, costed maintenance and management plan covering day-time, evenings and night-time is required for Oxford Street and side streets affected by the transition and transformation proposals.
- Next steps should be to identify where budget gaps for maintenance and management might be, and how funding and mechanisms can be put in place to ensure a swift response to maintenance and management issues after pedestrianisation to uphold high standards in the public realm across the scheme.
- Proposals for enhanced street management at night need to be understood given the proposed launch of activity and the expectation of anti-social behaviour and rough sleeping.
- There is a need to introduce additional power supplies as part of the scheme in order to facilitate end to end activation and illuminations and this is an opportunity to introduce district-wide wifi.
- Surface art seems unnecessary as it will compete with the retail offer and architecture and generally be concealed by pedestrians.

HOSTILE VEHICLE MITIGATION (HVM)

- There are concerns around the visual and spatial impacts of hostile vehicle mitigation (HVM) measures), specifically their design and locations.
- There are concerns that those areas of the Oxford Street district that are not within the extents of the proposed HVM (e.g. zone B) could remain comparatively vulnerable, therefore could possibly be seen as soft targets in comparison to those within proposed secure boundaries.
- More information on the detail of proposed approach to HVM across the scheme would be welcomed, as this currently seems inconsistent or unclear: specifically, on where, when and how necessary vehicles (i.e. emergency services) could gain access through the HVM lines.

There is the need for a more detailed conversation and consultation on the design and location of HVM across the Oxford Street district, especially in relation to the stated preference for vehicle access overnight on Oxford Street.

20MPH ZONE

- 20mph as a mechanism to mitigate speeds would be welcome and improve safety.
- Extension of the existing 20mph zone across the entire Oxford Street district is proposed.
- 20mph restrictions are now in place on a number of streets between Gloucester Place and Edgware Road. Although this might have a limited impact on the average traffic speeds of the overall area, it sends a clear message that the priority in the Oxford Street District is as a place for people who live, work or visit and as such primarily travel on foot.
- An expansion of the 20mph zone could be coupled with a retiming of traffic lights across
 the district to ensure that traffic flows are optimised and positive impacts on air quality are
 maximised.

CYCLING

- The proposals would benefit from an agreed east-west cycle route north of Oxford Street. There is concern that provision on Wigmore Street may not be conducive to a pleasant cycling environment in the district due to additional general traffic and the carriageway width.
- There is concern that the proposed east-west cycle routes north and south of Oxford Street are indirect and that they will not be legible or navigable by those wishing to use them to cycle into and through the area around Oxford Street.
- Cycle routes need further development in order to deliver the ambition of the scheme.
- Consideration can be given to whether bicycles should be allowed on Oxford Street outside
 of the busy pedestrian hours, in line with a timed access approach.

TAXIS

It is proposed that taxis should be permitted to use Oxford Street in the out of hours' period. This would reduce the night-time impact on residents and provide access and oversight to the street.

SESSION 1 - ZONES A & B

Attendees:

Alison Jenkins - Marks & Spencer (Marble Arch)

Soul Malik - Boots

Ed Russell – Body Shop

Simon Loomes – The Portman Estate

Simon Adams – Urban Flow for Grosvenor

Scott Marshall – Grosvenor

Peter Matthews – Real Estate Management

Thomas Derstroff – TPA for Real Estate Management

Mike Fairmaner – Marble Arch BID

Martin Rugg – Primark

Simon Donaldson – St Christopher's Place

Rupesh Varsani – Almacantar

ZONE A STREET BY STREET ISSUES



Bayswater Road

No specific comments made

Edgware Road

A weakness of the proposals are they do not tie into Marble Arch or improve this traffic dominated area and also risk worsening traffic impacts at this gateway to Oxford Street and also Hyde Park. There is a clear need to immediately start looking at Marble Arch and the surrounding arterial roads to improve their operational efficiency, safety and potential as a West End destination in their own right.

Cumberland Gate

■ The use of Cumberland Gate for bus standing creates a comprehensive visual barrier between Marble Arch/Oxford Street and the Great Park. This is effectively a permanent feature. Views to the National Monument are highly impacted. The setting of the Grade I listed arch should be respected.

Tyburn Way

- Proposed that Tyburn Way is closed completely to reduce severance between both Hyde Park and Oxford Street and the east and west areas of the central island and improve the sense of Marble Arch as a single public place. This would improve its potential for events and provide safe access to the fountains.
- Reopen the public toilets.
- The bus stands currently block views and cause severance, which should be addressed in the scheme. See comments under Cumberland Gate.

Marble Arch

- Marble Arch as a public space and the Grade I listed monument itself has been overlooked as an opportunity.
- The proposed continued use of Tyburn Way as bus stands is detrimental to the ambition for the West End due to the visual impact of a constant wall of buses.
- The scheme could be enhanced by proposals to improve the pedestrian subway and access to the Underground, including making this route step-free. It could also be improved akin to the Wonderpass under Marylebone Road.
- Need to improve legibility of entrance/exit into the London Underground avoid people crossing to the northern entrance due to a lack of visibility and legibility around the alternative entrances. The street trading pitch adjacent to the south underground exit could be removed as it causes severance and limits visibility.
- Improve presentation of the main tube entrance retail frontages.

- Is there more that could be done to reduce the actual number of vehicles and lighten the impact and perception of the traffic flow, in order to civilise Park Lane and Marble Arch carriageways, to reduce traffic dominance?
- Hostile vehicle mitigation measures elsewhere could mean Marble Arch becomes a more obvious target for an attack as result of Oxford Street's increased protection.
- Support for widening of footways, particularly around the London Underground entrance to the north and any enlargement of pedestrian crossing islands.
- Suggestion to reduce the Park Lane to Cumberland Gate southbound right turn from two lanes to a single lane to reduce crossing distance for pedestrians and the perception of vehicle dominance.
- Suggestion to add another connection into Hyde Park because the relationship between
 Oxford Street and Hyde Park is important but suffers from a high degree of severance.

Great Cumberland Place

 Support for upgrade to Great Cumberland/Seymour Street Junction, which has a poor safety record.

Park Lane

More could be done either within the scope of the Oxford Street scheme or as a separate options study to begin to address Park Lane and its traffic-dominated environment.

ZONE B STREET BY STREET ISSUES



Oxford Street

- There is a concern that the proposals could cause the decline of Oxford Street west of Orchard Street (OSWW).
- There is real concern that the gap in the quality of retail could widen, causing irreversible decline in this part of Oxford Street. This is already a poor relation to the rest of Oxford Street.
- Currently there are major retail anchors to the west of Orchard Street (including Primark and Marks & Spencer), however the proposals will not support the long term future of key anchor stores on this part of Oxford Street.
- The entire length of Oxford Street west of Oxford Circus all the way to Marble Arch needs to be designed with transformational improvements and delivered simultaneously to the proposals for Oxford Street between Oxford Circus and Orchard Street. It is accepted that Oxford Street between Orchard Street and Marble Arch will need to retain some traffic in the short term. However, this should not be a barrier to delivering widened and de-cluttered footways in the same palette of materials as are proposed for Orchard Street to Oxford Circus.
- Design of a raised gateway treatment, in a palette of materials that encourages footfall west towards Marble Arch, at the Orchard Street/Oxford Street junction is encouraged. This would encourage seamless pedestrian movement between the pedestrianised area and OSWW.
- A high quality diagonal-style crossing is required to overcome the potential barrier that the Orchard Street junction would become.
- There should be a coach ban for this stretch of Oxford Street to reduce impact and improve safety.

- There is a need to make Marble Arch a step-free station to ensure there is access to the London Underground at the western end of Oxford Street, and not necessitate a journey back to Oxford Circus for lift access, this can be facilitated on the central gyratory.
- There is a need to see the justification for the proposed approach to hostile vehicle mitigation for this area (e.g. Primark is outside the zone of protection). This end of Oxford Street could be made more vulnerable in relation to other parts of the consulted scheme further east along Oxford Street.
- One approach could be to use the rhythm of objects in the streetscape as HVM to an extent (lampposts, signage, benches, trees etc).
- Servicing hours are important and there is a need to ensure servicing is not disruptive to the shopping environment
- Kerbside servicing hours in this western extent of Oxford Street could be controlled in the scheme, even if it has different traffic management to the pedestrianised areas. Further detail on the existing and proposed kerb side traffic management, to allow comparison, should have been provided within the consultation material (applies to all streets).
- Replacement of all street furniture is required to maintain quality.

Orchard Street

- There is a concern over the impact of proposed limits to vehicle access on Orchard Street from the north.
- Access to important servicing and car park in Edwards Mews needs to be retained.
 Moreover, there are opportunities to deliver public realm improvements to Edwards Mews.
- There is a risk that signage and access controls heading south into Orchard Street will be confusing.
- If traffic access on Orchard Street into Edwards Mews is not well designed there may be a risk of directing people though smaller mews streets.
- High numbers of bus stops will undermine the quality of the visitor experience in the street space, to the detriment of the two major attractions of Marks & Spencer and Selfridges trading from Orchard Street frontages. The proposed southbound stop on Orchard Street is in close proximity to the stops on Baker Street and Wigmore Street and Oxford Street. A review of the need for all these stops is requested, with the proposal that the Orchard Street stops are removed, which would have the added advantage of improving bus journey times and improving footway space.
- The proposed reduction of footway space on Oxford Street corner outside Marks & Spencer is a concern and detrimental to pedestrian safety at a collision hotspot.
- There is concern that Portman Mews South will become a rat run.

Old Quebec Street

• HVM should be considered at the entrances to this oasis space. Residential parking on this street should be removed as it predominantly provides free parking for Oxford Street.

Bryanston Street

 Residential parking on this street should be removed as it predominantly provides free parking for Oxford Street.

Seymour Street

- Proposed improvements to crossings are welcome and long overdue. Ideally these would go
 further to improve pedestrian experience, and be implemented all the way to and including
 the junction with Edgware Road.
- There is concern about the scheme creating a through route to go east west, a simple route for taxis, along Wigmore and Seymour Street stretching from Great Portland Street to Edgware Road.
- Would like to see a ban on coach traffic for this section of Oxford Street and north into Marylebone. Coaches should be routed up Edgware Road. This would be a good concession for residents, improve road layout and kerb geometries as buses can make tighter turns.

Portman Square

No specific comments made.

Portman Mews South

 Residential parking on this street should be removed as it predominantly provides free parking for Oxford Street.

Granville Place

 Residential parking on this street should be removed as it predominantly provides free parking for Oxford Street.

Orchard Street

 Residential parking on this street should be removed as it predominantly provides free parking for Oxford Street.

North Audley Street

- Why does the direction of this street and Park Street need to change? Stakeholders would like to see detail such as strategic traffic modelling results to understand this. The proposals could encourage drivers to cut into Mayfair at the south end of Park Lane and travel north across the neighbourhood, which should be reflected within the strategic traffic model. Stakeholders would like assurance that this is not going to be the case.
- There are significant concerns that the traffic modelling underpinning the proposals have not adequately considered the relocation of the American Embassy (and the recent planning

- consent at 30 Grosvenor Square) which will see the reopening of the west side of Grosvenor Square to traffic. This further compounds the concern highlighted above.
- Parking bay changes to the south of the street are not ideal; they are inconsistent with planned improvements between Providence Court and Grosvenor Square.
- Two-way operation on North Audley Street between Oxford Street and North Row as a potential solution to specifically allow bus turn around may be an alternative solution to changing Park Street and North Audley Street. This could allow North Audley Street to remain southbound and protect Mayfair from having a south-north rat run.

Grosvenor Square

- There are concerns over impact on Grosvenor Square. Stakeholders do not wish for unintended negative impact on Mayfair in terms of traffic; especially difficult for residents on street away from Oxford Street.
- Have the implications of Grosvenor Square opening on the west side to traffic (as part of the American Embassy building redevelopment) been properly considered and strategically modelled?

Upper Brook Street

- Upper Brook Street would be a better route than the proposed for east-west cycling in the district; it would be clearer, intelligible, and continuous. Current proposals are circuitous, and not easy to understand.
- Grosvenor suggests that proposals to add a cycling route to the mix of uses/users in the spaces directly outside the new Bond Street Elizabeth Line exit is potentially problematic.

North Row

- Orchard Street to Park Lane changes might push servicing and vehicle circuits into North Row; stakeholders do not wish to see that.
- There is concern over the inappropriateness of a bus stand proposed immediately in front of residential properties and their entrance, its impact on ability to service the commercial properties, and the reduction of and displacement of visitor and residential on-street parking provision away from the retail end at North Audley Street.

Park Street

No specific comments made.

Green Street

 Current pedestrian and cycle crossing needs more developed design and an option for cycle traffic to continue straight across Park Lane without having to dismount and cross as a pedestrian, as the current design implies.

SESSION 2 - ZONE C & D

Attendees:

Angela Banks - Next

Ed Russell – Body Shop

George Caneparo – Caneparo Associates for GMO Real Estate

Simon Adams – Urban Flow for Grosvenor

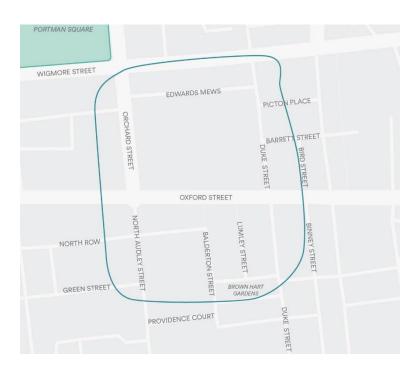
Scott Marshall – Grosvenor (attended first part of the session)

Lee Hailey – WSP for Selfridges

Michael Lindsay – Selfridges

Simon Donaldson – St Christopher's Place

ZONE C STREET BY STREET ISSUES



Oxford Street

- Stakeholders wished to echo the calls in session one for service access overnight.
- Stakeholders queried whether suggested times are correct; these should be 'scientifically'
 data-led and considered (i.e. based on when businesses need service access and the options
 fully appraised and tested.
- Stakeholders welcomed the scenario of servicing taking place outside core trading hours.
- There is not a clear argument why overnight access would not allow the improvement of paving surfaces during the transition scheme, nor why this should be incompatible with the carriageway being brought up to pavement level if access is controlled.
- Concerns on impact to Gee's Court; need to keep the area clear around entrance due to its small size.
- Access to James Street southern section could also be allowed for vehicles in line with overnight servicing access.
- Stakeholders suggest that encouraging the idea of Oxford Street ought to have some overnight vehicle access as service only, not just general traffic, which have the benefit of en-living the street, which otherwise would be a deadened space overnight.
- Stakeholders identified the need to keep Oxford Street alive at night.
- Good access for deliveries for large retailers and building materials for developers are important.

Orchard Street

- There is a concern over impact of proposed limits to vehicle access on Orchard Street from the north.
- There is a risk of limiting access to the important servicing and car park access in Edwards Mews.
- There is a risk that signage and access controls heading south into Orchard Street will be confusing.
- If traffic access on Orchard Street into Edwards Mews is not well designed there may be a risk of directing people though smaller mews streets.
- High numbers of buses might undermine the quality of the visitor experience in the street space, to the detriment of the two major attractions of Marks & Spencer and Selfridges trading from Orchard Street frontages.
- The proposed reduction of footway space on Oxford Street corner outside Marks & Spencer is a concern
- There is a preference from Selfridges for the proposed vehicle restriction to be moved south of Portman Mews; this would allow access from the north for both Selfridges customers accessing Edwards Mews car park and also for servicing and delivery vehicles.
- There is a concern on the extents of the new bus stop cage, the number of buses and their frequency of using stops, and the subsequent impact on the façade of the classic building and customer experience of the district.
- There is a concern that Orchard Street will feel like a bus and taxi rank with negative impacts on the pedestrian experience, movement and ease of crossing.
- Could the bus stops be removed from Orchard Street entirely or spread so adjacent stops on Wigmore and Oxford Street are slightly increased (see previous workshop comments)?

Barrett Street / James Street / Picton Place

- There are significant concerns over the proposals for vehicle access to James Street, Barrett Street and Picton Place. Stakeholders fear that cul-de-sac dead ends and changes to access as proposed will increase the conflict between pedestrians and vehicles in these streets and undermine the WCC Duke Street improvements.
- There is a preference from stakeholders for the existing one-way vehicle movement southbound on James Street, westbound on Barrett Street and eastbound on Picton Place it is felt that Barrett Street is too narrow for two-way traffic.
- Two-way traffic on Barrett Street will cause congestion problems outside the new Selfridges
 Duke Street entrance as vehicles must negotiate a narrow entry/exit point to Barrett Street
 leading to conflicts especially between servicing vehicles and pedestrian desire lines.
- The proposed pedestrian zone on James Street from 11am till midnight and proposed two-way 'cul-de-sac' on Barrett Street would be detrimental to the pedestrian experience of moving between St Christopher's Place and Duke Street/ Selfridges, especially with all-day servicing and the turning of service vehicles on Barrett Street.
- An alternative proposal is to close the area from Wigmore Street to north of Picton Place to through traffic during the day and create a better public realm on this part of James Street, which is where the majority of street dining takes place. This would allow existing vehicle movements to be retained on Barrett Street and Picton Place.
- Vehicles will have to make three point turns at the Barrett Street James Street junction, which would introduce a new collision risk because of the high number of pedestrians in this location. There is concern about the proposed cul-de-sac leading to drivers also using St Christopher's Place plaza for turning.
- A single traffic movement around the corner of James Street and into Barrett Street would reduce pedestrian and vehicle conflict by reducing and simplifying the range of vehicle movements
- Need to keep chauffeured traffic moving not stationary; need to retain Picton/Barrett, but also retain left hand turn into Orchard Street.

Duke Street

- Proposed Oxford Street scheme should not undermine the benefits of the WCC approved Duke Street scheme, which is a committed scheme, paused until Crossrail no longer needs construction haulage routes via Weighhouse Street/ Duke Street.
- There are negative potential impacts to the Duke Street entry experience for Selfridges customers and current tree planting due to the implications of proposed two-way movements in and out of Barrett Street.
- Concern over the reduction from three lanes to two lanes at the junction with Wigmore Street, the subsequent reduction in capacity and the impact of this on vehicle queuing back down Duke Street.
- Concern expressed regarding the introduction of motorcycle parking to the northern end of the road.

Weighhouse Street

- There are concerns from stakeholders that the proposals do not reflect the expected uplift in pedestrian flows and the importance of Weighhouse Street to the Oxford Street district in relation to the Elizabeth Line setting and quality of the arrival experience; this needs to be emphasised better.
- Could more be done to improve pedestrian dispersal in an attractive environment?

Barrett Street

See previous comments

Bird Street

 Bird Street is an opportunity to be designed as a permanent oasis space, from Oxford Street and connecting back into the district.

Binney Street

No specific comments made.

Lumley Street

- Lumley Street seems to be a missed opportunity in the proposals; for the sake of 4-5 resident parking spaces the improvement of this street is not being undertaken. Stakeholders suggest that studies of the wider and immediate area show around 20% actual parking occupancy. Lumley Street could be closed off entirely to create a better link from Oxford Street to Brown Hart Gardens; it's a shame this isn't being proposed given importance of Brown Hart Gardens as an oasis to Oxford Street.
- This example links to a broader resident parking issue; stakeholders wish to start a conversation about the future of residential parking and increased flexibility in the kerbside space offer across the district. A number of the streets to the south could benefit more people for more of the time if kerbside demand could be tailored to need/use parking demand, particularly residential parking demand, is expected to decrease over the coming years.

Balderton Street

The ambition to create a district and increase the usage of side streets will not be achievable without the relocation of green trader kiosks and de-cluttering at side street junctions to allow the level of wayfinding needed.

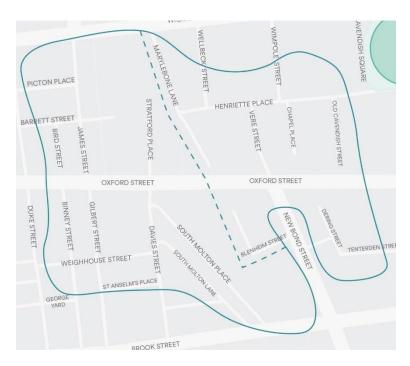
North Row

See previous comments.

North Audley Street

- See previous comments.
- North Audley Street proposed to be reversed in its flow. There is concern about the banned left turn into Orchard Street from Wigmore Street creating a convoluted route back to Selfridges from the south adding pressure to North Audley and Duke Streets.

ZONE D STREET BY STREET ISSUES



Oxford Street

See previous comments.

Wigmore Street

 Support for improvements to pedestrian crossings and the provision of simultaneous green man on all crossings.

Marylebone Lane:

- The proposal to block off the junction with Marylebone Lane heading north from Wigmore Street. This will effectively pedestrianise this section of Marylebone Lane (between Wigmore Street and Bentinck Street). Residents and delivery vehicles will be able to accesses the Lane from Bentinck Street but will need to turn to come back out. This will prevent any through traffic.
- However, on the section of Marylebone Lane south of Wigmore Street there is concern that
 this is proposed as a new bus route. The road is narrow therefore it would be better if this
 became primarily a pedestrian route heading north from the new Bond Street tube
 entrance.

Stratford Place

- This space has huge potential to be improved as an oasis space. Are there further public realm opportunities in Stratford Place that should be explored?
- Stakeholders queried whether crossing the pedestrian flows of Oxford Street might make it tricky for vehicles to get in and out of this junction.
- Is there a need for signalised control of vehicles crossing of Oxford Street for pedestrian safety and also consistency along length of Oxford Street?

Vere Street

There is a lack of improvements proposed that benefit pedestrians on this street; this does not encourage pedestrian movement off Oxford Street and into the wider district to the north.

Welbeck Street

This could be a better route than Marylebone Lane for turning buses, in particular the swept path at the northern junction would be easier for buses. This would have the additional benefit of reducing traffic on Marylebone Lane, which is a popular route for pedestrians.

Wimpole Street

No specific comments made.

Henrietta Place

There is a lack of improvements proposed that benefit pedestrians on this street; this does not encourage pedestrian movement off Oxford Street and into the wider district to the north.

Chapel Place

No specific comments made.

Old Cavendish Street

There is a lack of improvements proposed that benefit pedestrians on this street; this does not encourage pedestrian movement off Oxford Street and into the wider district to the north.

Tenterden Street

No specific comments made.

Dering Street

- This street is likely to become very busy as a key pedestrian route to and from the Elizabeth Line station and Oxford Street.
- No vehicular connection between Dering Street and Oxford Street is proposed, but proposals leave vehicle access in Dering Street as a dead end, this could create potential

- conflicts between pedestrians and manoeuvring vehicles.
- Can Dering Street access hours be aligned with those of Tenterden Street and Oxford Street?
- If Oxford Street retail premises are expected to service from Dering Street, there could be potential conflicts between pedestrians and manoeuvring vehicles.

New Bond Street

- The proposed HVM bollards could align to gateway treatments and building lines to provide a better experience of turning the corner from Oxford Street to the south.
- This could apply to all junctions to the south where the bollard line parallel with Oxford Street is not far enough down the side-return.

Blenheim Street

No specific comments made.

South Molton Street

- This is a servicing route. There is a need for a consistent message across the district's streets, rather than different restrictions and times for each bit.
- A simpler solution will be easiest to manage, i.e. same timings across timed vehicle access spaces. This would also limit signage and therefore street clutter.

South Molton Lane

No specific comments made.

Davies Street

- Davies Street north end, adjacent to the Bond Street West Elizabeth Line entrance has the potential to become a really problematic conflict point. This is due to pedestrian flow levels conflicting with service vehicles, taxis, general traffic and cyclists in this area. The proposal for 24/7 loading bays and no through route for HGVs means that three point turns will be necessary at this high footfall location. This is potentially very unsafe.
- It was felt that this gateway to Oxford Street and Mayfair's narrow streets was not ambitious or transformational enough to achieve the scheme's full potential.
- Formal and informal wayfinding can be improved here and there is potential to improve pedestrian routes one block back from Oxford Street to enhance the sense of creating an Oxford Street district.
- Is directly in front of the new Elizabeth Line station the most appropriate place for a loading bay, given the heavy pedestrian flows entering and exiting the station?
- The proposals to add a cycling route to the mix of uses/ users in the spaces directly outside
 the new Bond Street Elizabeth Line exit are potentially problematic due to the predicted high
 levels of footfall.

St Anselm's Place

• No specific comments made.

Weighhouse Street

- See previous comments.
- East-west cycle route is important to consider around Weighhouse Street; should it be heavily signed (promoted) or just let them permeate (just allowed).
- There is concern that the proposals here undermine the proposed HVM measures elsewhere because HGCs can access this sensitive point and park up to load/ unload.

Gilbert Street

No specific comments made

SESSION 3 - ZONE E & F

Attendees:

Tom Waterhouse – The Crown Estate

Simon Adams – Urban Flow for Grosvenor

Edward Russell – Body Shop

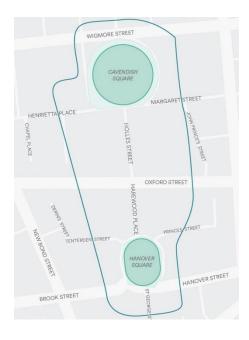
Andy Joy – Arcadia

Alex Buy – Atkins for The Crown Estate

Chris Greenwood – Atkins for The Crown Estate

Sue Stephens – John Lewis

ZONE E STREET BY STREET ISSUES



Traffic modelling in this zone

Current traffic modelling of the proposals appears to show additional queuing of traffic during evening rush hour at the junction of Great Marlborough Street and Regent Street, creating a queue of traffic in front of Liberty London and obstructing pedestrian flow southwards from Regent Street and Argyll Street into Carnaby Street and Soho. This is of major concern as this area is already very congested and pedestrians are forced into the carriageways.

Oxford Street

- Stakeholders echoed current calls for service access overnight where appropriate and decisions on access to be evidence-led.
- Stakeholders queried whether suggested service times are correct; these should be data-led
 and 'scientifically' considered (i.e. based on when businesses need it, business feedback and
 analysis).
- Stakeholders welcomed the scenario of servicing taking place outside core trading hours.
- There is not a clear argument why overnight access would not allow the improvement of paving surfaces during the transition scheme, nor why this should be incompatible with the carriageway being brought up to pavement level.
- The ten to ten or similar timings are reasonable using Oxford Street flexibly for servicing at night-time avoids too much pressure on surrounding streets.
- Concerns were raised regarding timed access and also significant increases in pedestrian traffic, which might make the case for treating side streets such as Princes Street in the same way as Oxford Street (i.e. timed access, improved material design on carriageways).

Harewood Place

- NWEC has also developed design proposals for Harewood Place and Holles Street, which contribute to the overall vision for the district.
- Stakeholders raised concerns over the kerbside proposals for this street, and noted that it is
 a major gateway to and from Oxford Street and the Elizabeth Line station.
- This is a crossing of Oxford Street where both contraflow cycling and proposed vehicle crossing may be problematic as it's one-way for vehicles but two-way for cyclists and extra pedestrians – this might be a risk, and there is a high potential for conflict.
- Can the vehicle movements across this junction be minimised?
- Requires understanding of other schemes to understand cumulative impact. If Harewood Place is vehicle-free during the day, this might be better as there would be fewer potential conflicts at busy pedestrian times. Customer experience would benefit from keeping vehicles out of as many places as possible, especially Harewood Place and this crossing of Oxford Street.
- One stakeholder said that their modelling suggests that pedestrians leaving Elizabeth Line station will likely need the full width of Harewood Place, building to building, in the morning peaks.

Wigmore Street

 Pedestrian crossing points are welcome and at the same time signals should be coordinated to maximise traffic flows.

Henrietta Place

• No specific comments made.

Cavendish Square

- Cavendish could become an important part of Oxford Street district, creating an accessible green space for people to dwell and relax.
- There is already concern about the number of buses on Cavendish Place, and the congestion that this is causing. Currently, Cavendish Place is one-way but when it is made two-way under the proposals, with two additional bus routes, the congestion is likely to increase significantly. Further thought needs to be given to alleviate the current problem which is only going to be made worse by the current proposals.
- Cavendish Square is currently severed by roads and cut off by barriers, therefore in inaccessible. It is therefore important that proposals are brought forward to integrate the square into the wider district as a place that people can use.
- A proposal is for the the north south routes on Cavendish Square to be pedestrianised, together with some public realm improvements to open up the square to provide better public access. This would create a welcoming area of green space for tourists, shoppers and office workers to enjoy.
- The current proposals unfortunately are not taking advantage of this potential, and the increased traffic around the square is only likely to exacerbate the current problems.

Margaret Street

No specific comments made.

Holles Street

- NWEC has also developed design proposals for Harewood Place and Holles Street, which contribute to the overall vision for the district.
- Both buildings on Holles Street have off-street servicing arrangements; this makes it a
 potential space for further improvements to the public realm, above and beyond those
 proposed.
- Smaller units on the south side of Oxford Street itself (without rear access onto another street) are the ones that will need to use on-street space in Holles Street. Stakeholders raised concerns that the proposals would result in these retailers using trolleys across Oxford Street and this would not be beneficial to the visitor experience or business life. This is an existing issue with demand vs. capacity on that block.
- Use of Holles Street space for servicing Oxford Street properties could be a lost opportunity to improve links to/ from Oxford Street and the WCC car park in Cavendish Square, which would be to the benefit to the district as a whole.
- Delivery access on Oxford Street itself outside busy pedestrian hours is seen by stakeholders as the best way to free up space and to meet the ambition of improvements to the whole Oxford Street district.

St George Street

No specific comments made.

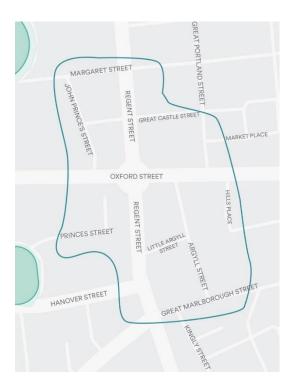
Brook Street

• No specific comments made.

Tenterden Street

• No specific comments made.

ZONE F STREET BY STREET ISSUES



Oxford Street and Oxford Circus

- Stakeholders highlighted a risk in current proposals that Oxford Circus would become an unbalanced space, losing its coherence as a focal point for Oxford Street and Regent Street.
- 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.
- There is a need to design all of Oxford Circus as a public space, reflecting the coherence and symmetry of the architecture, no matter what the traffic and vehicle controls are on either side.
- There was concern that footways in the Oxford Circus area are being reduced by over two metres. This area already has a low pedestrian comfort level, therefore footway space needs to be increased, rather than reduced.
- There are also seasonal pedestrian safety issues at Oxford Circus when London Underground use is higher.
- Concern that pedestrians would still cross without waiting for green man at Oxford Circus due to overcrowded pavements.
- Concerns were raised about traffic movement at the junction with Regent Street. Banning turns and simplifying the junction would improve safety and enhance the look of the public realm design.
- Stakeholders stated their preference that the first eastern section of Oxford Street between Regent Street and Great Portland Street be added to the pedestrianisation scheme. This would complement a better design of Oxford Circus.

- Stakeholders want to create the best space at Oxford Circus as a whole, to avoid traffic turns being made across the junction and to reduce safety risks to pedestrians at Oxford Circus.
- In relation to full pedestrianisation, stakeholders are supportive but concerned about traffic pressure to side streets, e.g. Princes Street and Harewood Place, if full closure goes ahead.
- In principle, pedestrianisation is supported by key stakeholders on this part of Oxford Street, but while it makes sense to implement in phases, it does not make sense to design it in phases.
- Reconsidering the timings of implementation could enable a holistic consideration of Oxford Circus.

John Princes Street

No specific comments made.

Margaret Street

No specific comments made.

Regent Street

- A diagonal crossing on Regent Street at the junction with Margaret Street, was proposed to improve access for commuters from Elizabeth Line to the wider district.
- Stakeholders raised concerns over the design for HVM bollards on the east side of the street. The proposals could create quite a brutal design, which might overwhelm the qualities of the listed buildings and the public space.
- Stakeholders raised the idea of holding traffic back (in relation to pedestrian crossings at Oxford Circus) just south of Princes Street on Regent Street, to improve pedestrian crossing to/from the Elizabeth Line. Princes Street and Oxford Circus crossings could be linked to create the best possible pedestrian environment at the centre of Oxford Street as a whole.

Great Castle Street

• No specific comments made.

Great Portland Street

• If the first eastern section of Oxford Street between Regent Street and Great Portland Street could be added to the pedestrianisation scheme, buses could be routed up the southern block of Great Portland Street to connect with currently proposed re-routing.

Hills Place

No specific comments made.

Argyll Street

• No specific comments made.

Little Argyll Street

• No specific comments made.

Great Marlborough Street

• No specific comments made.

Hanover Street

Stakeholders would like to see a reversal of the traffic direction on Hanover Street tested and modelled to understand the impact of such a change. This could potentially simplify Regent Street's junction with Hanover Street and unlock benefits to pedestrian routes across the north of Hanover Square, Harewood Place and Princes Street.

Princes Street

• No specific comments made.