

Oxford Street 2nd Consultation December 2017 – Marylebone Association Response

The Marylebone Association is Westminster City Council's statutory consultee on the area bounded by Oxford Street in the south, Marylebone Road to the north, Edgware Road to the west and Great Portland Street to the east. Thus we represent one of the neighbourhoods most affected by the current consultation. Unlike many Amenity Societies, the Association has both resident and business members.

As in the earlier consultation, **we cannot support the current proposals for Oxford Street** which leave far too many unresolved questions over protection of the West End as a whole.

Mayor Sadiq Khan has repeatedly stressed that pedestrianisation of Oxford Street should only go ahead if there is **no detriment to surrounding residential areas**. There is nothing in the present proposals which convinces us that this will be the case.

Traffic displacement – This is a key issue both in itself and because the projected pollution levels are predicated on the traffic modelling. We believe that the attempt to move buses, taxis, pedicabs and cyclists to the already congested Wigmore Street will result in traffic seeking other routes through the surrounding residential streets. Traffic will not simply disappear. No drivers enter the West End for fun – they are there for a specific purpose and will seek out the most convenient way for themselves, regardless of the streets they use.

The increased congestion will result in higher pollution levels in areas where there are residents, many of whom are elderly; schools, many of them primary; acute hospitals and numerous other clinics and medical practices surrounding the Harley Street/Wimpole Street core. The neighbourhood of Marylebone also contains many small businesses and large company headquarters offices. Schoolchildren, medical patients, workers and residents spend all day in unhealthy air.

On Sundays, Marylebone already sees high levels of traffic and demands for parking as the extremely popular Farmers' Market brings in shoppers to the High Street area from far and wide. Also, visitors to Regent's Park take advantage of the free parking in Marylebone as the Royal Parks charge on Sundays. The question of Sunday parking enforcement and charging would need to be revisited if even more traffic is displaced from Oxford Street.

Cycling - There is no plan for cyclists in the consultation other than a reference to "developing a high quality east-west cycle route to the north of Oxford Street". This has been examined in the past and proved to be extremely difficult, even for a Quietway. To make such provision in the face of the additional traffic displaced by this scheme would, in our view, be impossible.

Accessibility issues – A comprehensive report, produced for the project, highlights many and varied issues. Effective solutions to these problems for the disabled, elderly, parents with prams and even able-bodied shoppers laden with purchases are conspicuous by their absence. Walking up to 400 metres to a bus stop or to change buses is not acceptable. The bus service plans seem to have been designed to make it easier for shoppers to travel to the highly-accessible Westfield shopping centre at White City and ignore Oxford Street altogether.

Buses will be problematic in a number of ways. The well-established network will be disrupted, creating the need to change buses where stops do not coincide and often involving lengthy walks. Terminating services short of Oxford Street creates the need for additional bus stands around Marble Arch and for 6 buses in or near Portman Square as well as on Welbeck Street (3 buses) and Wigmore Street. Apart from turning south Marylebone into an open-air bus garage, it will be galling for passengers to see buses running to and from stands closer to their destinations than the stop where they are forced to alight or board.

The consultation makes much of the 18 buses per hour in each direction along Wigmore Street but there will be 30 per hour on Welbeck Street, 40 per hour on the south side of Cavendish Square and 52 on Margaret Street, all but 18 running empty! The rear of John Lewis will be passed by 70 buses an hour with only half actually serving passengers. These are, of course, only the current proposals. There will be nothing to stop TfL increasing the number of buses if Oxford Street is closed and the projected minimal services prove insufficient.

We note that the consultation says *“The number of people walking along the southern section of Marylebone Lane will increase once the Elizabeth line has opened. We propose widening and improving the pavements on the section of Marylebone Lane to the south of Wigmore Street.”* This is precisely the section of road where westbound buses are to be routed for the first time. As the project clearly believes that buses can coexist happily with a larger number of pedestrians on Marylebone Lane, why not on Oxford Street itself?

We have gone from one extreme, with the former “wall of buses” on Oxford Street, to another, with the bare minimum of two services running insufficiently close to where people want to go. By contrast, the southern part of Upper Regent Street will see 105 buses an hour southbound on the single-lane approach to Oxford Circus. Traffic on Portland Place already struggles to move for much of the day. Sadly none of these southbound buses now serve the Berkeley Square area as the C2 did before it was curtailed.

We argued for years for the “hopper” fare which would enable the reduction of buses on Oxford Street in the face of rigid opposition from Transport for London. Having achieved it with the change of Mayor we will barely have the opportunity to savour the benefits. Travel on Oxford Street is now more efficient and more civilised and we are told that the accident rate has improved. Shoppers, workers and residents deserve a bus service that works for them.

Night closure, deliveries and servicing - Despite a series of meetings with stakeholders, a number of surprise major changes were introduced immediately before the second consultation was published, not least of which is **closure of Oxford Street West to all traffic, 24 hours a day, every day.**

To take this change first, it moves all traffic into residential areas at night, when a larger number of vehicles currently use Oxford Street because there are no restrictions, unlike during the daytime. People will have to wait for buses and taxis away from Oxford Street where pedicabs and Uber cars will also clog the streets hoping for fares. Anti-social behaviour will inevitably spread to these surrounding streets.

Delivery trucks and waste collection vehicles will also have to use residential streets to access the shops and businesses of Oxford Street instead of approaching directly. They will have to park on side streets and wheel cages and bins along the pavements, causing additional noise and disruption. The shortage of kerb space will result in conflicts for loading space between delivery vehicles, cabs etc. These neighbouring side streets will, in effect, turn into a servicing depot for Oxford Street. Westminster City Council and TfL have stated, both in the consultation and earlier, that relatively few buildings are presently serviced from Oxford Street, but their own figures show around 30% of Oxford Street shops have no rear or side access, whilst a survey by the Better Oxford Street campaign indicates an even higher percentage.

Secondly, a number of street closures emerged including a ban on anything but goods vehicles using Old Cavendish Street. Coupled with the move of the pedestrian crossing to a point further west on Henrietta Place, this will make the John Lewis customer collection point totally inaccessible by car or taxi.

A third last-minute move involves changes to the southern end of the Baker Street/Gloucester Place two-way scheme, which took years of careful planning and is less than half way through construction. A proposed southbound bus lane on Orchard Street will block access to the rear of Selfridges for shoppers' cars and deliveries. Reversing the direction of the roads south of Oxford Street will disrupt the planned operation of the two-way scheme.

Management and Enforcement - The consultation admits that a comprehensive plan for Management and Enforcement would be needed to ensure that noise, anti-social and criminal behaviour are controlled and that deliveries and waste collections take place at civilised hours so that residents can be confident of being able to sleep. However, no such plan yet exists, merely a list of requirements that need to be fulfilled.

Police presence in the West End as a whole has reduced dramatically in recent times and many residents are reluctant to venture far at night. Would police numbers be increased and for how long? How would this be guaranteed and ring fenced from future cuts? Would this be at the expense of the surrounding areas? Again, without a Management Plan there are no answers.

Even more importantly, there is no sign of funding for such an expensive ongoing management exercise. Westminster City Council cannot even meet existing demands for enforcement. West End businesses are opposed to night closure and are thus hardly likely to fund its management, especially at a time when the private sector is facing increased business rates and demands to fund the public realm aspects of the scheme. Central government has shown no interest in helping London any further. Oxford Street is a Westminster road and will be Westminster City Council's liability. Should Westminster be taking on the risk of a long-term funding commitment at this time of extensive and far reaching budget cuts when councillors can identify many, many more pressing claims?

Improvements to surrounding areas - The plans are repeatedly sold on the basis of transforming the Oxford Street District. However, the "district" is not defined in the consultation, nor is there any discernible plan for improvements, except the installation of more pedestrian crossings on Wigmore Street, which are years overdue and will be provided

whether or not pedestrianisation of Oxford Street goes ahead.

Summary- To summarise, we believe that the additional footfall expected from Crossrail on and around Oxford Street can be accommodated without removing traffic altogether. Westminster City Council's improvements to Oxford Street East point to ways of increasing, and making more efficient use of, pedestrian space at potential pinch points.

We welcome the Mayor's plans to extend the Ultra Low Emission Zone and initiatives to consolidate freight deliveries and waste collections; introduce more zero-emission vehicles; charge the most polluting vehicles and deter through traffic from coming into the West End at all. These would bring a major improvement in air quality in a relatively short time.

By contrast, this approach which begins with the aim of fully pedestrianising Oxford Street will have the opposite effect on the residential areas of the West End. Marylebone has been designated a Low Emissions Neighbourhood but its efforts to make a dramatic impact on pollution levels would be totally thwarted by traffic displacement as a result of pedestrianisation.

The Mayor and Westminster City Council should be working to improve the lives of those who live, work and shop in the West End, not worsen them.

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