

Transformation of Oxford Street: Stage 2 - East

Sustrans response to Transport for London and Westminster City Council

Summary

Sustrans welcomes progress on the transformation of Oxford Street and the opportunity to comment on proposals. We share the vision for a vehicle-free boulevard in the heart of the capital. One that removes the major source air pollution and traffic danger for the thousands of people that visit Oxford Street every day, and unlocks new public space for all to enjoy. We also believe the opportunity should be maximized to reduce traffic and the dominance of traffic in the surrounding area and improve conditions for cycling.

We strongly support:

- The complete removal of traffic from Oxford Street, 24 hours a day
- Walking improvements across the wider Oxford Street area including new crossings, wider footways and improved seating

We are concerned by:

- A lack of detail regarding the provision of high quality cycle routes through the surrounding area, particularly for east-west movements along corridors to the north and south of Oxford Street
- A lack of information on cycle parking across the district
- The continued dominance of traffic on surrounding streets, which appears in stark contrast to the shared vision for the area

The plans should therefore include:

- High-quality east-west cycle routes to the north and south of Oxford Street either through segregated cycle lanes or signed routes on streets with low-traffic volumes and speeds; and improved cycle permeability and facilities for north-south movements across Oxford Street.
- Low-traffic neighborhoods streets in the surrounding area, through filtered permeability

We expect further clarification and a response to these concerns at the next stage of consultation or sooner.

Question 1

Do you support our proposals for the transformation of the Oxford Street district?

Yes

Sustrans strongly supports the complete removal of motor-vehicle traffic from Oxford Street, 24 hours a day

Oxford Street is currently overcrowded and the presence of motor-vehicle traffic makes it dangerous and polluted. 500,000 people visit Oxford Street every day, suffering from air pollution levels that are four times the legal limit.¹ In 2014, 10 of TfL's 24 pedestrian collision hot spots were on Oxford Street and between January 2012 and September 2015 a pedestrian was involved in a collision approximately every seven days.² For these reasons, there is a clear need to remove the larger source of road danger and pollution from Oxford Street and unlock it as a place to enjoy.

According to the consultation material, the majority of servicing and deliveries take place off Oxford Street, therefore we believe it should be closed to traffic 24 hours a day.

Stratford Place should also be closed to motor-vehicles

Stratford Place is a cul-de-sac only a short walk away from surrounding streets. It is unclear why access for motor-vehicles is to be retained. This appears to be a poor compromise given the low volumes of vehicles likely to use the street. A pedestrian crossing adjacent to Bond Street Station significantly weakens the scheme overall, particularly as the transformation is premised on the increase in visitors as a result of the Elizabeth Line at Bond Street in 2018.

Sustrans supports the proposed pedestrian crossings and widened footways

Widened footways on many surrounding streets are particularly welcomed. We strongly support proposals for signaled pedestrian crossings along the Seymour Street, Portman Square, Wigmore Street Corridor and are appalled that such basic facilities are not yet there.

Further reducing the dominance of traffic in the surrounding area

Sustrans welcomes the overall improvements to pedestrian facilities proposed within the scheme, however we are concerned that these simply do not go far enough to support easy, convenient and accessible walking in the area. Particularly given that the shared vision states: "Our vision is not simply to transform Oxford Street: the proposals we have developed are for the entire district. They would: Make it much easier to walk throughout the area Create beautiful, safe, accessible and inspiring

public spaces full of life and spectacle to address some of the very serious and pressing issues of poor road safety and air quality in the Oxford Street area.”

Low-traffic neighborhoods streets in the surrounding area, through filtered permeability

To further reduce the dominance of vehicles, the surrounding neighbourhood streets should be “filtered” to channel through-traffic onto appropriate main roads, and retain vehicle access only for deliveries and residents. This approach would dramatically improve conditions for walking and cycling at the same time, while reducing the potential for traffic displacement.

More ‘Copenhagen’ or blended crossings are needed at side-roads

While we welcome the major increase in raised carriageway treatments at side roads, we believe that the majority of these – particularly on minor side roads – should be ‘copenhagen’ or blended crossings, where the pavement continues across the side road, reinforcing the Highway Code through design and reducing turning vehicle speeds, further supporting priority for walking.

Excessive general traffic lanes and on-carriageway parking

Sustrans are particularly concerned by the excessive amount of space reserved for private motor-vehicles particularly at so called ‘Pedestrian Zones’. This is also a concern given the lack of cycle lanes and bus lanes, or priority measures. For example, at certain points:

- Oxford Street west (Marble Arch to Orchard Street) is four general traffic lanes
- Great Cumberland Place is four lanes
- Orchard Street features four lanes
- North Audley Street is one-way yet two traffic lanes
- Park Street is one-way yet two traffic lanes
- The Cavendish Place, Wigmore Street corridor is three lanes, and
- Upper Brook Street is two lanes

In addition, there is no information on whether the amount of private vehicle parking is appropriate or proportionate given the volume of journeys made by other means. We consider that there is excessive parking on:

- Bird Street, James Street (particularly as these are described as "Pedestrian Zones")
- Barrett Street
- John Prince’s Street
- Green Street
- The Cavendish Place, Wigmore Street corridor and Cavendish Square, and
- Stratford Place

The Transformation should include the introduction of 20mph speed limits

We are particularly concerned that no effort is being made to reduce speeds on surrounding streets. As large volumes of pedestrians will be making journeys to surrounding bus stops and stations and people cycling are displaced to surrounding streets, it is a very serious concern that these streets will remain 30mph, not 20 mph.

Cycling routes and access

“It is true that there is much more to be done to improve conditions for cyclists in central London ... The proposals for Oxford Street will be developed to advance these plans and ensure that cyclists have excellent access to Oxford Street and a quality parallel east-west route.”

- Mayor of London, 17 November 2016

There is a clear need for high-quality east-west cycling routes delivered alongside the transformation project

Sustrans is disappointed that no further information is given on proposals for cycle routes to cater for east-west movements in lieu of access to Oxford Street. We are concerned that the phasing of the scheme will result in pedestrian-cycle conflict on Oxford Street due to a lack of alternatives for cyclists. We are concerned by the volumes of heavy goods vehicles, buses and general traffic on surrounding streets that remain untreated in these proposal. The current consultation appears inconsistent with the Mayor’s commitment – quoted above – to develop proposals for Oxford Street to advance plans for the cycling network in central London, and a quality parallel east-west route.³

Given the strategic importance of catering for movements through the area, as highlighted in TfL’s Strategic Cycling Analysis⁴, we expect two high-quality routes, one to the north and one to the south. These routes should either be substantially-segregated from motor-traffic and pedestrians or follow very low-traffic streets that are sufficiently direct, designed to achieve no ‘critical fails’ and a 70% Cycling Level of Service score in TfL’s London Cycle Design Standards.⁵

Disabled cyclists should have barrier-free access to Oxford Street: we do not support the blanket ban on cycle access to Oxford Street

We are concerned that a blanket ban for cycle access to Oxford Street will limit the mobility of disabled Londoners. 17% of disabled Londoners cycle regularly or occasionally (Transport for London, 2015) and 69% of disabled cyclists find cycling easier than walking (Wheels for Wellbeing survey, 2017). The requirement to dismount will limit their mobility. In addition, disabled cyclists should be able to use Oxford Street free of fear of harassment from enforcement officers.

A clear need for a major increase in cycle parking

The consultation material currently lacks information on cycle parking, despite the statement that “We have endeavoured to increase the amount of cycle parking in the area”. There is a clear demand for increased cycle parking in the area. The arrival of

Elizabeth Line and the proposed transformation has the potential to further increase this demand. Cycling to Oxford Street should be enabled and encouraged through the provision of highly visible, easy to access, cycle parking that caters for non-standard cycles.

Cycling and walking access routes

The previously mentioned provision of excess car-parking and loading spaces on side streets is a concern for cycle access to the area. Designs for side streets should welcome people on cycles and provide cycle access as close as possible, avoiding conflict with large volumes of turning vehicles, particularly heavy vehicles.

We strongly support the proposed walking and cycling signalised crossing of Park Lane to Green Street. We are concerned however that there is a left-hook risk for westbound cycles travelling from Green Street to Hyde Park. In addition, the lack of a direct route between the proposed signalised crossing and Hyde Park limit its attractiveness. The proposed route is double the length (120 metres) of a direct crossing over the 5 northbound lanes of Park Lane (60 metres). A direct, signalised walking and cycling crossing should be provided across the northbound lanes of Park Lane, linking Hyde Park and Green Street.

We would welcome designs that provide a clearer transition for cyclists accessing the pedestrianized area from the west of Orchard Street. There is no straight ahead cycle facility or cycle parking identified in the proposed highway drawings.

Cycle diversions to the south

The detailed highway designs factsheet features a number of new cycle logos and on carriageway wayfinding markings. We are particularly concerned by the convoluted nature of the route, if this is to be the cycle diversion to the south of Oxford Street that broadly follows: Lee's Place, Providence Court, George Yard, Binney Street.

Permitted movements

To further improve permeability for people cycling, we are concerned at the 14 permitted movements for buses and taxis only that exclude people cycling. It is unclear why cycling is banned from these movements.

Opening one-way streets to two-way cycling

To aid in the permeability for people cycling in the West End and to make the most of the opportunity of reorganising streets in the area, the transformation should have an assumption in favour of contra-flow cycling on one-way streets, identifying any appropriate exemptions. Initially, protected contra-flow cycling should be delivered on Vere Street and Brook Street / Grosvenor Square.

Question 2

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 included 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 other comments about this issue, please record them below.

We believe the success of Oxford Street's transformation is dependent on the provision of high-quality, parallel cycle route nearby. This is one of our core principles that should guide the project and would ensure Oxford Street can be substantially pedestrianised, while cycling through and to the West End would be very substantially improved.

We hold seven principles that we think should guide this transformation:

1. Make Oxford Street a world class visitor and business destination - a great place to be and walk
2. Accessible to all, regardless of age or disability
3. A safe environment, day and night
4. Removal of all motor traffic with access to buses and taxis a short walk away
5. Provision of a parallel high-quality east-west cycle route
6. Careful consideration of the impact on the wider West End
7. Consolidated deliveries limited to off-peak times

We also believe that the opportunity should be taken to change the way deliveries and services are transported to Oxford Street and the surrounding district, through consolidation, re-time and the use of alternative vehicles, for example.

Together these will ensure the project deliver's maximum benefits in reducing the dominance of motor-traffic while improving options for active travel and quality of life. This will help maintain London's global position a place to live, work, visit and invest in.

Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

Join us on our journey. www.sustrans.org.uk

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VAT Registration No. 416740656

References

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- ² **London Assembly** (2016) Oxford Street - a feet street only?
<https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/oxford-street-feet-street-only#acc-i-45078> (last accessed 14/12/017)
- ³ **Mayor of London** (2016) Written Correspondence regarding Oxford Street with Chair of London Assembly Transport Committee, 17 November 2016
- ⁴ **Transport for London** (2017) Strategic Cycling Analysis
- ⁵ **Transport for London** (2014) London Cycle Design Standards