

229 Great Portland Street, London, W1W 5PN

OXFORD STREET DRAFT PLACE STRATEGY AND DELIVERY PLAN - CONSULTATION RESPONSE

Better Oxford Street (BOS) is a not-for-profit organisation formed and supported by all of the West End's recognised amenity groups, including the Marylebone Association, the Harrowby and District Residents Association, the Soho Society, the Fitzrovia Neighbourhood Association, the Residents' Society of Mayfair and St James, the Mayfair Residents Group, the Charlotte Street Association and the Hyde Park Estate Residents Association.

1. OVERVIEW

It firstly needs to be stated that, regardless of any comments made on the individual proposals, this plan is broadly welcomed. It represents a considerable advance over the previous scheme, not just in content but also in the method of delivery which is in the main pragmatic and responsive to the many needs of the area.

2. Equally, we support the more balanced district wide approach now being taken by Westminster Council. The fact that many suggestions previously made by ourselves, various individual amenity societies and other organisations have clearly been listened to and incorporated in the plan makes it easy for us to endorse much of what is being proposed in the current consultation.

3. We agree that the definition of the district should remain flexible throughout the process, to allow for responses to studies and ideas. It should also remain subordinate to the neighbourhoods to be found within it. We welcome this more graded approach, designed to build on certain key concepts but with an eye to the pragmatic development of the area. We applaud the avoidance of a concept design incorporating grand gestures that often turn out to be counterproductive and sweeping vision statements that sound impressive but ultimately prove to be meaningless.

4. The district has emerged organically, Oxford Street through its years of development having had a reciprocity with the streets surrounding it. The individual neighbourhoods of Soho, Mayfair, Marylebone and Fitzrovia retain their own particular characters and are in effect a series of entirely separate neighbourhoods grouped around a central road. This is a major part of what makes the area unique and we are therefore pleased it has been recognised that the Oxford Street district is there to serve and improve these

areas, not the other way round. To this end, any future development needs to be practical, balanced and incremental to reflect this.

5. Further the comments below are made understanding that this is an engagement exercise and that the proposals set out are just proposals and that more detail will follow on the ideas that are selected in due course; when no doubt there will be further opportunities for comment.

6. We anticipate that a methodology by then will have been developed to justify those proposals that are to be taken forward. For instance, traffic modelling which has not yet been carried out, would be necessary to show the effects on traffic displacement for various suggestions such as the closing of minor streets, part closure of Oxford Street, closure of Oxford Circus, and any restriction of the available carriageway on Oxford Street - if any of these ideas were actually be taken further. We have also assumed that there will be the opportunity for further consultations on the details of the proposals that do emerge from the present exercise.

2. OUR RESPONSE

1. It is noted that there are some differences between the two documents that we have used to inform our response to this consultation: the 146 page *Oxford Street Place Strategy and Delivery Plan Cabinet Report version draft 17.10.18* - mainly only available online, and the shorter, more widely circulated: *Oxford Street Place Strategy and Delivery Plan - The Future of Oxford Street*.

2. The latter document is the more widely published and the one handed out at the consultations. We have chosen to refer to his unless specifically otherwise stated.

3. We have divided our comments into two sections to reflect the breakdown within the Westminster document.

4. Firstly on the Place Strategy: we have not attempted a comprehensive analysis of the strategy as this is unnecessary - we are in agreement with many points, such as: freight and waste consolidation, public realm improvements, air quality improvements, greening, improved accessibility and street management - and others we can accept without comment.

5. Secondly on the Delivery plan: we find the majority of specific proposals set out in the Delivery Plan broadly acceptable or desirable. We expect any details and issues with this to be dealt with by individual amenity societies whose areas they affect.

6. However we have found it necessary to raise a few significant concerns that have emerged in the details of the plan. They are limited to the proposals for Oxford Street itself which would result in outcomes that we previously understood had been unambiguously abandoned by the Council; proposals that appear to contradict previous statements made by the Council and that even appear to contradict parts of the present Strategy.

7. We note that in the introduction reference is made to “*the area’s historic neighbourhoods that sets it aside from national and international rivals*”. It must not be forgotten that the very reason that these areas are historic and unique is because they were not just places where people shopped and worked, but where they lived and where they continue to do so.

3. THE CONSULTATION AND ONLINE SURVEY

We are concerned that certain very significant proposals: those that advocate the closing or restricting of Oxford Street, have been buried in a large amount of detail about much else. Given their relative importance to residents and businesses, and given that they would reintroduce in part what was widely found to be unacceptable in the previous scheme, they needed to be more clearly stated. They will not generate much local comment if their import is not understood and that will not be readily apparent to most at the consultation stage, particularly where they contradict what has been stated elsewhere by the Council about keeping the road open. The vast majority of residents will have had quite enough of Oxford Street consultations. They will have heard that the pedestrianisation threat has been withdrawn and that will be enough for them. Thus, there will be a natural tendency to inertia and a reluctance to read and respond to the detail. It would be a mistake however to interpret this as approval for any schemes similar to those previously rejected.

2. Conversely, we are concerned that the closure proposals could generate a higher response from the national pedestrianisation lobby groups such as Living Streets. They have highlighted the traffic removal suggestions on their website and encourage their members to respond en masse in their own words in favour of it - having learnt to avoid the previous template responses.

3. Accordingly a significant response from those who do not know the area with an ideological commitment to pedestrianisation could distort the true level of genuine responses from those who live and work in the area. It will therefore be important to identify the locality of the responses and to separate them accordingly.

4. Further, on the subject of the online consultation response, we are concerned that it is lengthy and difficult to navigate and hard to understand what is being asked about which proposal and when. This is further aggravated by the use of different terms in the online questionnaire to the Place Strategy. The whole thing lacks the clarity to enable it to be used quickly and effectively by the average respondent - and to go into the detail required will challenge the patience of all save the most committed.

5. In summary, all this could well result in the absence of substantial adverse comment on those issue that we list as of concern but this cannot be relied on as consent to proposals that have not been clearly stated in the first place and which then have been made unnecessarily difficult to respond to.

4. THE PLACE STRATEGY - CHALLENGES FACING THE DISTRICT

1. We are in agreement with the list of challenges facing the district and we would single out as the greatest present challenge: poor air quality. All our associations wish to make it clear that they find the present level of air quality in central London unacceptable. Residents are very keen to see an overall reduction in total numbers of vehicles coming into the area and would be keen to see concrete proposals for achieving this, both through emerging policies in this Strategy and in the City Plan; presumably mainly through partnership with central government and TfL. But not entirely, for instance, the Marylebone Low Emission Neighbourhood has achieved a modest reduction in older diesel vehicles visiting the neighbourhood through selective parking tariffs.

2. No proposals for reductions in total vehicle numbers emerged from the previous TfL led consultation which instead relied heavily on the discredited theory of traffic evaporation - that once a road is closed the traffic will go away. Residents know however that it simply goes down the adjacent streets that have not been closed. The only real solution to improving air quality is to avoid blocking or closing any more streets and concentrate on reducing absolute vehicle numbers.

3. We would regard the second greatest challenge as accessibility. The significant reduction of buses could, and already is, resulting in the loss of easy access to and through Oxford Street by some large and important groups: the elderly and disabled, shoppers with prams or young children, night workers and all those who for whatever reason do not wish to travel by tube, or cannot afford to do so on a regular basis. Our research revealed that there is a sizeable number of workers who cannot afford the more expensive tube fares.

4. The third greatest challenge, which we would list under the poor quality of the public realm, is rubbish collection. If this cannot be got right, and at present it clearly cannot,

then it hardly matters how much is spent on new granite slabs and other street improvements, the area will still be unpleasant for pedestrians. It is an obvious point and one that should not even need to be stated, but it is an issue that all our member amenity societies have lobbied Westminster Council on over very many years, and over all this time it has not been effectively tackled.

5. We would also suggest an additional challenge facing the district to be listed:

Achieving a balance between residents, businesses and those who visit the district: The four neighbourhoods making up the Oxford Street district have many businesses and visitors but they are also home to many thousands of residents. The character of the area is drawn from this mix and this in turn makes it a desirable destination for its visitors. Great care is needed to maintain this balance and to ensure that proposals are not taken forward that will be to the detriment of one or more of these groups.

5. THE PLACE STRATEGY - THE 12 AREA WIDE PRINCIPLES

1. We are in agreement with the 12 Area Wide Principles but for the reasons stated above we would like to see one further principle added:

To protect and nurture the different neighbourhoods within the area and safeguard residential amenity.

6. THE PLACE STRATEGY - THE THREE PRINCIPLES SPECIFIC TO OXFORD STREET

1. We support the three principles specific to Oxford Street. We note that the third of these principles states that; *“Oxford Street is to remain an important transport corridor for the West End”*.

2. This statement is not compatible with unduly restricting the traffic flow on Oxford Street.

3. The crux of the problem with the previous scheme, and the main reason it met with such widespread opposition, coalesced around the multiple problems (detailed at length in our response to the previous consultation) that would have come from closing Oxford Street and the resulting traffic displacement onto neighbouring roads. **An overriding principle of any new scheme should therefore be, as Westminster Council has**

previously stated it was, to avoid any proposals that will result in diverting significant amounts of traffic away from Oxford Street into neighbouring areas.

7. THE PLACE STRATEGY - THE KEY PROPOSALS

1. We are supportive of these — with two significant exceptions:

2. A. Reduction of the width of the road on Oxford Street.

CONCERN - that this would result in displacement of much of the existing traffic through neighbouring roads. Whilst understanding the reasons for this we do not feel that a single carriageway would work in this context. It would create havoc for the many deliveries and waste collections that go on in it. It would be unsafe for cyclists and would further aggravate the congestion caused by pedicabs (which unfortunately we have to assume will be there for the foreseeable future - as all attempts to remove them over the last ten years have failed).

3. The resulting congestion will mean displacement, particularly of taxis, vans and lorries to neighbouring streets and increased pollution. The anxiety about this effectively caused the collapse of the Mayor's TfL scheme; it is what we were promised any future scheme would avoid. Protecting the surrounding neighbourhood from traffic displacement is further claimed to be one of the objectives of this Strategy.

4. We would therefore be unable to support this proposal and would ask that, at the very minimum, if the carriageway is to be significantly reduced, the option of shared space, pull-ins for deliveries, etc., is incorporated within the scheme, although this would still not improve the situation for cyclists.

5. We assume that no reduction of carriageway space is contemplated between Marble Arch and Orchard Street due to the amount of additional traffic in that part of Oxford Street.

6. B. Create areas of high pedestrian priority on Oxford Street.

"In high stress areas where the widening and decluttering of footways is insufficient to address safety problems, consider reduction, restriction or removal of traffic at appropriate times of the day". Oxford Street Place Strategy and Delivery Plan - The Future of Oxford Street.

CONCERN - that to restrict or remove all traffic from Oxford Street apart from buses at certain times of the day is in effect to close it for part of the day to all vehicles other than buses. This is what Westminster Council said it would not do and

what residents fought a prolonged campaign prior to this against it doing. It would therefore be in breach of Westminster's promises to the electorate made only a few months ago.

7. The headline quote from WCC on departing from the previous TfL scheme was that the Mayor's plan had been abandoned and that Oxford Street was to remain open to traffic and that is repeated in the Council's previous Cabinet Report on Oxford Street. It is again repeated in the present report - it features as one of the 3 principles specific to Oxford Street outlined in the Strategy - "*to maintain Oxford Street's role as an important traffic corridor in the West End*". Removal of traffic at certain times of the day on a regular basis is not compatible with this principle.

8. We do however recognise the opening of the Elizabeth Line, when it finally happens (and this appears an increasingly distant prospect), will bring with it increased numbers which necessitate that the Council takes active and effective steps to ensure pedestrian safety. This should not however include pre-emptive regular road closures based on unproven extrapolated pedestrian figures, as we have set out at some length in the previous Oxford Street consultation. We appreciate however that it could be desirable to look at temporary reductions in the amount of traffic, other than buses, at times of exceptionally high footfall for certain parts of the street, for example on certain days in the lead up to the Christmas period. We would be happy to explore with the Council the possible ways this could be made to work without undue disruption to the surrounding neighbourhoods.

9. Otherwise, pedestrian comfort can be accommodated by a variety of other methods many of which are outlined in the Strategy: decluttering pavements, pavement widening in places, and drawing footfall on to side streets by a variety of measures. Further the Elizabeth Line stations do not open out to Oxford Street directly, but to Dean Street, Hanover Square and Davies Street, which, as the Strategy itself states, will radically alter the way people move across the district.

10. We note that the ideas put forward are called proposals, obviously because that is all that they are at present - proposals out for consultation, and that issues arising from them will be listened to and taken into account before any final decision is made. They are also as yet unevicenced by any the technical work necessary, including traffic modelling, to assess their viability.

8. THE PLACE STRATEGY - THE FOUR CHALLENGES TO THE AREA

We are in agreement with the 4 challenges to the area as stated - with the following proviso on part Challenge 4 - *creating a district that is accessible*: the significant

reduction of buses could, and already is, resulting in the loss of easy access to and through Oxford Street. We are concerned that further reduction in buses and routes will be counterproductive and make travel very difficult, particularly at peak times. In addition its affect on certain user groups is harmful (see 4.3 above). It is however recognised that the provision of bus routes through and to Oxford Street is controlled by TfL and that their actions are governed by current economic imperatives. Having said that, the first of the 14 Principles in the Cabinet Report version includes - *“retaining access on Oxford Street to buses”*.

2. Concerning the proposals for a safety and management plan: we would not only endorse this but regard it as crucial to the smooth and successful running of everything else proposed. Effective management has been wanting in many areas in the past and it will not be achieved in the future without additional resources. Many of the suggestions made in the Strategy will only succeed with the correct management measures directly built in. Pocket Parks, to give just one example, cannot just be built and left, otherwise they rapidly become run down and shoddy and little better than open air toilets.

3. The Cabinet Report under management goes into more detail and we would single out and support two statements in it as of particular importance:

“enhance on-street presence and the capability to respond to or intervene against illegal practices and bad behaviour” CABINET REPORT VERSION · 17,10,18

“Develop policies to improve effective management of key issues and lobby Government for legislative change where required, for example regarding the appropriate management of Pedicabs”. CABINET REPORT VERSION · 17,10,18

5. But with management must come effective enforcement. Without this all else could fail, for this reason we feel that it should be elevated to a proposal and could be added to point 10 in the Area Wide Principles:

*“Have an improved management plan to ensure that the district is safe and well maintained **and it is recognised that effective and well funded enforcement is key to this**”*

6. We note that a budget of £150 million over the next three years has been set aside to bring forward all the proposals and we would be interested to see a breakdown on anticipated expenditure, particularly the distinction made between the sums going to capital costs and those going to management costs.

7. The total scheme, depending on how many projects are ultimately undertaken, will no doubt exceed this sum and it has already been stated that Westminster Council will be looking for a certain percentage of funding to come from outside sources. We assume that this will be primarily the business sector as the Mayor has now specifically stated that the TfL funding for Oxford Street will now be allocated elsewhere. We would like to know the level of contributions that WCC are at present anticipating and where the funding is expected to come from. Some obvious sources are assumed to be: Business Improvement Districts, the Great Estates, and developers, possibly through CIL payments.

9. THE DELIVERY PLAN - ZONE 18 - MARBLE ARCH

1. *“Around Marble Arch and the islands to address the long standing severance of Marble Arch from Oxford Street and Hyde Park. Alternative alignment of roads could unlock opportunities to introduce a gateway space at the western end of the district and a more direct connection to Hyde Park.”* CABINET REPORT VERSION · 17,10,18

2. We support the majority of the proposals as set out, particularly the proposal to review the location of coach stops around Marble Arch and seek to identify proposals that improve ease of access to coach services and relocate coach stops from unsuitable locations such as Portman Street.

3. We note that there is no detail given on any proposals for re-alignment of traffic in the area, apart from recognising some of the difficulties in doing this. It is also noted that the difficulties are compounded by the fact that TfL owns this section of road.

4. We wonder if it is worth exploring with TfL the possibility of the removal of Tyburn Way to enable the formation of a single area which could be quite effectively screened off with judicious planting. This road runs between the two islands and at present only appears to serve as a space for bus stands. These stands could be then be reallocated to the west side of the West Island, perhaps by constructing a pull-in area. Failing that, consideration could be given to a pedestrian crossing, or even a bridge, between the two islands.

5. On the present proposals we have 2 concerns, as listed below:

6. **CONCERN - over creating a playground on the West Island.** Whilst we support the intention to create more play areas we question the suitability of this location. This area will still essentially remain a roundabout for a large amount of polluting traffic and as such does not appear to be a desirable place to put a children's playground

7. **CONCERN - over TfL removal of certain bus routes** - this will result in more crowded bus stops around Marble Arch as people will need to disembark to change buses to get to their destinations. We wonder if some of this could be alleviated by relocating some of the existing bus stops.

10. THE DELIVERY PLAN - ZONE 59 - CAVENDISH SQUARE

1. We are supportive of the creation of a playground and landscape improvements and redesign, however:

2. **CONCERN - over the loss of all parking spaces in the underground car park.** Whilst we fully support the improvements to the Square we are worried that this proposal, which is not fundamental to the concept, will create considerably more pressure on parking spaces in the immediate area. Particularly as the only other car park nearby, in Welbeck Street, has now closed, to be replaced by a hotel.

3. It should be noted that if everyone is forced to on-street parking then those drivers unable to use the computerised telephone parking system necessary for it will be unable to park anywhere, even if they could find a space. This is not a desirable outcome as many in this group need to use a car to visit the area for medical reasons.

11. THE DELIVERY PLAN - ZONE 10 - OXFORD CIRCUS

1. **CONCERN - that the Council Leader's promise to residents and one of the 3 Oxford Street principles is being breached by this proposal - to keep Oxford Street open to traffic and not be pedestrianised:**

"In recent council elections local people also essentially rejected pedestrianisation through the ballot box... Westminster Council has taken the pedestrianisation of Oxford Street off the table for good and we have informed the Mayor and TfL of our decision"
Leader of the Council and Cabinet Member for Placemaking and Planning.

"Oxford Street will continue to provide a route for 2 way traffic and not be pedestrianised"

Oxford Street Place Strategy and Delivery Plan - The Future of Oxford Street.

2. Westminster Council have made it clear both during the election and since that pedestrianisation was off the table - but here is a proposal to pedestrianise a significant part of Oxford Street.

3. It is also in breach of a further strategy proposal: *“Protecting neighbourhoods from vehicles that could be displaced by any improvement work”*. CABINET REPORT VERSION · 17.10.18

4. In routing all traffic around neighbouring roads this proposal is reintroducing pedestrianisation by recreating a miniature version of the previous scheme - that is creating a needless diversion around a straight line. More pollution and congestion will be generated by forcing vehicles to travel at least 3 times as far to get round Oxford Circus rather than through it. The extra time and hassle that this route entails would inevitably deter bus users from using it due to the extra time added to the journey would result in traffic displacement through neighbouring areas by taxis and other vehicles trying to avoid it. This in turn will lead to extra pollution generated by the needless increases in journey lengths and resulting queues.

5. If buses and other vehicles are to be kept on Oxford Street, then they should be able to travel all the way along Oxford Street. Removing left and right bus turns at Oxford Circus to allow for the extra space may be required for pavement improvements to cater for times of high capacity and this is what we had understood was the original proposal for Oxford Circus.

6. Now this proposal appears to permanently close Oxford Circus to all east-west traffic. Yet this is the very area that, as a result of the opening of the Elizabeth Line, is forecast to have some of the pedestrian pressure removed and to see a relative decline in numbers. The new Bond Street/Hanover Square stations will take on many of the journeys that previously terminated at Oxford Circus. And this will continue into the future - on WCC's own figures by 2023 numbers at Bond Street will be up by 22%, at Tottenham Court Road by 25%, whereas the increase forecast for Oxford Circus is 6%.

7. Only in 2009, £5 million was spent in upgrading Oxford Circus to the new diagonal crossing and since then it has become one of the roads most famous features. At the time Westminster Council welcomed this as a major triumph in accommodating safely the many numbers of pedestrians in the area. The figures have not changed appreciably since then.

8. It is therefore proposed to close the one part of Oxford Street that has been most recently upgraded at considerable expense, with the one station in Oxford Street that is forecast to have a relative drop in footfall in the future.

9. Although it is recognised more needs to be done we would have hoped that this could be realised within the context of the improvements already made. Further, the proposals for Oxford Circus seem to be in conflict with the Strategy's own aspirations for John

Prince's Street which will hardly benefit from having all the Oxford Street traffic routed through it:

"Encourage use of John Prince's Street by improving pedestrian areas. Introduce new paving, seating, planting and lighting". CABINET REPORT VERSION · 17,10,18

10. A further issue with John Prince's Street arises if the Oxford Street traffic is to be diverted along it: the bus stands that are presently there would need to be moved, but it is not obvious where they could be relocated that would still be close to Oxford Circus.

11. This creates another issue of concern: the plan already proposes removing bus stands in Harewood Place; it also appears that the stands in Holles Street would need to be relocated if the plans for improvements and developing clear views between Hanover and Cavendish Square are to go forward. But where are these bus stands to go? Even after the proposed TfL reductions there will need to be stands for four busy bus services: 7, 55, 73 and the 159 (to be cut back from Marble Arch when the Elizabeth line comes in to operation). Bus stands are already located in Cavendish and Henrietta Places. It is therefore likely that proposals will re-emerge to use the terminuses previously identified by the rejected TfL led scheme in Welbeck and Wimpole Street. The routing of buses further into Marylebone was an extremely unpopular part of the previous scheme and would be equally unacceptable this time round.

12. Yet a further problem with the closure of Oxford Circus would likely arise in accommodating the additional traffic crossing Upper Regent Street as it would require longer red light phases against north-south traffic. However this traffic already faces considerable congestion from the single lane at Oxford Circus often backing up beyond Langham Place and into Portland Place. Further delays would be highly detrimental for access to Regent Street south of Oxford Circus, especially for buses. The additional congestion will cause more pollution and no doubt result in drivers using alternative routes through the narrow surrounding streets, causing yet further traffic displacement into the surrounding areas.

13. In summary, the potential for inconvenience, displacement, congestion and increased pollution to residents and local businesses from this proposal is significant and the probable gain for pedestrians nominal. The scheme would be particularly concerning if proposed on a 24 hour basis. The large amount of night time traffic that presently uses Oxford Street would end up diverting down neighbouring side streets to avoid a diversion around Oxford Circus.

14. This scheme is wrong for all the same reasons that the previous pedestrianisation scheme was wrong and we are disappointed, and not a little surprised, to see its re-

emergence now from the wreckage of the latter. It will please no one; the Mayor is “underwhelmed” by it, businesses unimpressed. As for the residents, most are at present totally unaware of these proposals. Indeed most of our member societies only gradually became aware of the true extent of the scheme as the consultation progressed. However, if it does go forward this will change - the West End did not overwhelmingly reject the first scheme only to stand by and see part of it re-introduced this time around.

15. That said, we note that this is at present only a proposal and that no detailed technical work has been carried out to assess the viability of pedestrianising this area, or none that we have seen. Also at this stage no traffic modelling has been undertaken, we are not even clear if the resources exist to satisfactorily trial night time traffic modelling. Certainly no night time figures were ever supplied by TfL under the previous scheme, in spite of many requests. Hopefully further research will bring with it a more measured approach to the issue of overcrowding at Oxford Circus.

12. THE DELIVERY PLAN - ZONE 17 - TOTTENHAM COURT ROAD JUNCTION

1. **CONCERN - that there may be a problem stemming from Camden’s West End Project.** Restricting Tottenham Court Road to buses only will mean that there will be no available left hand turn north for all the remaining traffic. Considerable congestion could therefore be encountered at this point as the only way will be forward. So traffic wishing to go north will be forced to divert onto side streets prior to this or over-sail and then have to make its way back further east in order to turn north. Either way this will result in a large amount of displacement through the available neighbouring streets with all the resulting consequences of pollution and congestion outlined elsewhere.

2. It is recognised however that the options open to WCC over this are very limited as this part of Oxford Street terminates on the border with Camden. We hope and assume that there has been a certain amount of interaction and dialogue between the two Boroughs concerning their mutual proposals and how they will jointly operate in a way to minimise traffic disruption.

SUMMARY

1. We broadly welcome Westminster's comprehensive new Place Shaping and Delivery Plan. This new district wide approach is applauded and we endorse many of the principles and proposals set out within it.

2. We have listed a number of concerns on which we would appreciate further details over those contained in the present documents. In addition we have major concerns with three Key Proposals which in turn feature in the Delivery Plan, all with priority level I, listed below:

A. The proposal to investigate options to close the section of road around Oxford Circus between John Prince's Street and Great Portland Street to all east-west traffic and pedestrianise it.

B. The proposal to restrict the width of Oxford Street to 2 carriageways only, along its entire length.

C. The proposal to close certain sections of Oxford Street to all traffic other than buses at certain times of the day.

3. These proposals appear to undermine the principle and purpose of keeping Oxford Street open to traffic and would result in outcomes that we previously understood had been unambiguously abandoned by the Council. Further they appear to contradict statements made both during the recent elections and since the abandonment of the joint TfL consultation. They even appear to contradict statements made elsewhere in this present Strategy: such as to keep Oxford Street open as an important traffic corridor for the West End and to take pedestrianisation off the table for good.

4. In the absence of any effective overall traffic mitigation each of these three proposals will threaten the surrounding neighbourhoods with traffic displacement from Oxford Street - with all the resulting undesirable consequences that flow from it, listed above and elsewhere.

5. The most worrying of the three proposals is the scheme for Oxford Circus, which not only violates the promises to abandon pedestrianisation for good made during and after the election but resurrects some of the worst aspects of the Mayor's discredited scheme.

6. However we appreciate however that this is simply a consultation exercise and those with an interest in the area have been invited to share their views on the ideas put forward in it. The tabled proposals stem from Westminster's overall vision for the area

and are as yet unevidenced by any of the technical work necessary to assess their viability.

7. The Council has stated that issues arising from the proposals will be listened to and taken into account before deciding which ideas to take forward, and in what form. We are pleased to hear this; we have therefore stated our case and hope to have a further and continuing dialogue on the issues raised with Westminster both through our individual amenity societies and other groups. Accordingly we look forward to seeing a large number of the many practical proposals to be found in the Strategy emerge endorsed and improved by this engagement exercise and become incorporated into a delivery plan that will be to the benefit of all our areas.

BETTER OXFORD STREET 16.12.2018