

Date: 16 Dec 2018

## **FitzWest Neighbourhood Forum response to the Oxford Street District Draft Place Strategy.**

### **Brief summary:**

Fitzwest welcomes the planning approach to the whole district rather than just Oxford Street.

Many of the principles, concepts and idea for improving the district regarding design, greening, accessibility and usage by pedestrians are broadly welcomed.

Recognising that this is only a preliminary set of ideas and concepts, much more work is needed before WCC presents a set of concrete proposals backed by traffic and data analysis.

There is a set of 87 projects proposed, with a budget of £150m allocated.

Clearly, at the next stage, WCC need to prioritise this list in order of 'importance', and change or drop proposals in view of this consultation round.

Bearing this in mind, we comment specifically on four projects:

***Market Place- we fully endorse, and encourage WCC to work with us, the New West End Company and with property owners who are working together to accelerate proposals to make it a better and a greener place.***

***Hanway Place- we endorse subject concerns raised.***

***Play/Public Space area in Little Portland Street: we propose a different location in Riding House Street, and reject the selection of Little Portland Street as unsuitable***

***Oxford Circus pedestrianisation -west-north:***

***We appreciate the need for additional space for pedestrians in certain areas of Oxford Street, and around Oxford Circus, where footfall is high at certain times of the day, and at certain times of the calendar [as detailed in the consultation document], and may grow in the future. Predictions for future growth should be re-examined due recent decline in tube usage recorded by TfL, recent trends towards shifting to shopping on line, and Brexit.***

***We would need to examine further detailed plan for traffic proposals, ensuring that those would not have detrimental impact on Fitzrovia in terms of extra congestion, air pollution and accessibility, as this would be contrary to our central aims and ambition for Fitzrovia's wellbeing for residents, businesses and visitors alike.***

***The discarded proposals for Oxford Street West [OSW] envisaged a fairly similar traffic diversion scheme to the one discussed in a meeting with WSD team on 10<sup>th</sup> Dec. We could not accept the OSW proposals because of the increased congestion and air pollution in Fitzrovia.***

A more detailed discussion can be found below, as well as an appendix discussing buses in Oxford Street, as well as the need to find new bus stands for four existing routes- 3 bus routes terminals relocated and a new one for route 159.

## **Detailed response:**

### **FitzWest: who are we, our draft Neighbourhood plan and priorities**

FitzWest was designated as a Neighbourhood Area, ranging between roughly Great Portland Street, Euston Road, the eastern boundary of WCC [roughly Cleveland Street Hanway Street and TCR] and Oxford Street. Fitzwest Neighbourhood Forum is a Business forum designated for this area.

We are part of the wider so called 'Oxford Street District' – a district composing of the individual neighbourhoods of Mayfair, Soho, Fitzrovia and Marylebone, linked by a major thoroughfare – Oxford Street. Each has its own character and distinction.

We are in the midst of formulating and adopting a draft Neighbourhood Plan for the area.

Our key policies for the area are: reduce air pollution, improve green space, improve walking and cycling in a safe environment, and better rubbish collection and storage, protecting the character and amenity of FitzWest.

We are promoting the usage of public transport, as so few residents own their own cars, walking, cycling and reduce the generation of road traffic and help reduce both air and noise pollution.

Within FitzWest, we identified three 'areas of change':

- Oxford Street Hinterland- to be made more attractive for smaller shops, cafes and services to support Oxford Street, with a re-landscaped al fresco eating quarter centered on Market Place
- Great Titchfield/Mortimer Street: improve local shopping and facilities, independent businesses, showrooms and cafes, enabling walking routes and greening.
- Great Portland Street: Re-attaching the tube station to it's surrounding, improve Holcroft court surrounding, more greening.

In the summer, we commissioned a report recommending some action on the environment-greening, walking and street landscaping; a copy was made available to the Oxford Street District [OSD] team.

### **Our response:**

We welcome and support a general wider approach for the whole district, and not just Oxford Street.

It acknowledges the wide variation of places, people, employment, leisure and use contained within the area, and the large economic contribution of employment within the 'hinterland' of Oxford Street [see P26- table showing 51% of employment in the district provide Professional Service].

This provides a more realistic view of the district, which is not skewed towards the major shopping street, but highlights the importance of the many world class professional services operating here- medical, media, educational, fashion, restaurants and cafes and retail- from local shops to large department stores. It contributes a major share to the local and London economy.

We understand that this consultation is a strategic and not a detailed consultation; it offers a comprehensive review of the area, highlighting the many issues identified by the WCC team [list on p12].

We expect that in the future, WCC would present more detailed proposals, supported by data analysis, traffic modelling and so forth.

**We broadly agree with the list of key challenges facing the district, as listed on page 15, and the much of the analysis accompanying the list.**

We would like to highlight some of the ones we identified over the years:

Time and again, the biggest issue identified by residents and businesses alike was **air pollution** and **congestion**. Both go hand in hand. Despite of improvement in emission standard requirements [the EURO 5 and EURO6 engine emission standard] applied to buses trucks and taxis, air quality in our area remains unacceptably poor. Our colleagues at Fitzrovia Neighbourhood Association regularly measure pollution using diffusion tubes, and the results are depressing to read.

Time and again, local people and businesses want to see a **reduction in the number of vehicles** coming to our area, while maintaining delivery facilities – ‘the lifeline’ for businesses around here.

The importance of maintaining **good public transport network**:

Oxford Street used to enjoy excellent public transport network: Oxford Street is the major natural vehicular transport route, offering a wide choice of destination via the bus route network, as well as being served by a large number of tube lines.

FitzWest residents rely on public transport [as well as walking or cycling], as car ownership is low.

When commenting a year ago on the predestination proposals, we explained how central the provision of a good bus network is to those who can not use the [inaccessible] Oxford Street Station and the tube network: The elderly, the young, the disabled, families with young children, the late night economy workers, and finally the often-overlooked group of people who simply can not afford paying the more expensive fares charged by the tube.

Our own surveys indicated that users value a bus route network – with easy-same- bus-stop interchange, and are prepared to wait a little bit longer for their bus, in preference to the disjointed network proposed last year.

The WCC report highlights the issue of **public realm and rubbish collection**- we are fully in accord with that, and we call for improvements to public realm, and the provision of more facilities, including greening.

Place strategy- Principles for Oxford Street District- 12 for the whole area, 3 for Oxford Street.

***We offer our support re: the set of 12 principles set out for the whole area.***

We support the principle [no 15 – p39] of embracing Oxford Street’s role as an important transport corridor for the west end’, but this is not compatible with your proposals to disable end to end traffic flow along Oxford Street by blocking an area around Oxford Circus for traffic.

Please refer to our detailed comment on this matter – in the Delivery Plan- Zone 10- Oxford Circus.

We note principles 13 and 14 relating to Oxford Street;

We would like to see further detailed proposals at the next stage of the consultation process.

### **Place Strategy- Elements [page 44]**

We are supportive of most of them, except for the following comments:

#### ***Oxford Street: Between Oxford Circus and Tottenham Court Road:***

On a daily basis, there is a major traffic congestion going west, stretching from Oxford Circus to as far as Poland or Berwick Street. Eastbound, congestion extends from TCR to Dean Street.

The westbound congestion can clearly be seen in the document- see p55 top photo. It also illustrates that buses do not cause the congestion- it is mainly taxis and commercial traffic.

The lower image shows a pedicab- slowing the traffic flow even further.

#### ***Vehicle Access:***

Restrict access to Oxford Street between Oxford Circus and TCR for private cars, and to commercial vehicles, especially between mid-day and 8pm- the peak period for pedestrians and congestion.

#### ***Reduce Oxford Street to one way each carriageway.***

Between Oxford Circus and TCR, this is already the case- except for two passing loops in each direction- eastbound and westbound- where the bus stops are. This allow traffic to bypass stopping buses and taxis and reduce the congestion.

Those loops are located well away from major junctions, and allow better flow of traffic. We think that is arrangement should stay. It would not impact the key areas with high pedestrian footfall demand

#### **Oxford Circus – Zone 10 -Proposals**

The proposals are to pedestrianise east-west section of Oxford Street between John Princess street and Great Portland Street.

This is shown on the map on page 108.

This is justified on the basis on the number of pedestrians using Oxford Street station, and on prediction of future use. There may well be a case for providing more footfall for pedestrians.

Most of the pedestrian congestion around Oxford Circus occurs at certain time only: the evening peak [1630-1900] and at weekends in the afternoon- especially around Xmas, the Sales and other special events. Much could be done to alleviate the congestion by removing clutter the kiosk at the top of Argyle Street, tighter control on street performers.

TfL latest publications show a drop for tube passenger figures, as well as revenue. There are no major new employment opportunities in the Oxford Street area, and the High Street is facing a crisis because of internet shopping. The economy is expected to take a dive following Brexit.

It suggests that optimistic predictions relating to tube and bus passenger numbers, visits to the high street and growth in the London economy are somewhat out of date, and should be re-examined, particularly in the light of Brexit.

What is not in doubt is the traffic congestion in Oxford Street- westwards towards Oxford Circus as detailed above.

We met WSD team as well as the traffic consultant on 10<sup>th</sup> Dec, discussing this proposal at some length. To WSD team credit, all our detailed questions were answered in full, given the understanding that at this stage the general plan is in its concept plan stage.

The issue arising out of this proposal is simple, the same issue arising from the proposals to pedestrianise Oxford Street West: ***this may well have an adverse impact on our area, increasing congestion, gridlock, and air pollution to the already congested road network between Great Castle Street East Castle Street, Margaret and Mortimer Street, as well as some north-south streets such as Wells street.***

Our understanding from the meeting is that westbound traffic would be diverted via Margaret Street [ from Oxford Street, turn right to Great Portland Street, turn right at Margaret Street] and from the east, traffic would be diverted at either Mortimer street or Great Castle Street, turn right at Great Portland Street, turn left at Oxford Street.

Additionally, it was mentioned that ***Mortimer Street would become two ways***- it is currently one way between Regent Street and Great Titchfield Street [Refers to ***project 74*** on the Project Matrix]

The bus diversions would impact routes 98 and 390 [19 buses per hour] – the two end-to-end Oxford Street bus routes, and routes 55 & 73 terminating at Oxford Circus from the east [22 buses per hour].

Focusing on Great Portland Street, buses going westwards- there would be 4 routes going each way at a combined frequency of 41 buses per hour.

***Great Castle Street*** is narrow, and is used for loadings for the shops fronting Oxford Street, the offloading bay forcing lorries to reverse backwards, standing northbound. Lorries movement would block any other traffic for some time, as the process of positioning the lorry takes some time.

***East Castle Street and Margaret streets*** are one of the main commercial vehicle routes westwards. Margaret Street is congested during the day, with tailbacks, and often blocked at late night because of a night club.

Another concern is that taxis would simply revert to using north-south directional street in Fitzrovia [and Soho] such as Wells Street, and Mortimer street to circumvent Oxford Street- something that would increase traffic congestion and pollution at the heart of Fitzrovia.

As far as we can see ***there are no measures proposed yet to reduce overall traffic*** in the area. It is hard to avoid the conclusion that the Oxford Circus proposals would lead to increased congestion, gridlock and air pollution to our area, and would have a detrimental impact.

We raised very similar concerns in our response to Oxford Street West scheme a year ago.

### **Market Place, Great Titchfield and Winsley Street – page 110:**

We fully support the proposals.

### **Hanway Street and Place- page 114**

Hanway Place offers a convenient alternative walkway avoiding the TCR/Oxford Street busy junction.

It is also home for small specialty shops, it is where deliveries are taking place to large Oxford Street shops, and it allows access to residents at Hanway Place.

Camden's West End Project would have an impact on TCR and Hanway Street. It is essential that WSD and Camden's West End project would be coordinated on this point.

So, a balance is to be had with all of those roles.

We raised this at our 10<sup>th</sup> December meeting, and we heard that OSD team already opened discussions with Camden on this matter.

In principle, we agree with the design scheme proposed as long as it takes account of the above-mentioned concerns. It should allow no motor vehicles except for access for deliveries.

### **Play Public Space Area in Little Portland Street- project 66**

This refers to Little Portland Street between Regent Street and Great Portland Street

#### ***We oppose the plan for several reasons:***

There are no children or teenagers living in the vicinity, and there is a much better facility a block away in Cavendish Square- greener, larger, safer and more welcoming- more suitable.

Little Portland Street is narrow, surrounded by tall buildings, forming a continuous block and produces a Canyon effect for residents. The sun doesn't even fully reach ground level in high summer. There are residents in the street, and Morley house- at the corner of Regent Street- is being redeveloped into housing by Crown Estate, entrance on Little Portland Street.

There are issues at night- there are issues of public safety -i.e. drug dealings, drunks and homeless people as well as pedicab stand in a car free area. It will make the area unpleasant and unsafe for local residents, and would make it much harder to control by WCC and law enforcement.

Local residents in Little Portland Street oppose the proposals.

At Fitz West, ***we have identified a more suitable location of a play area- in Riding Street between Nassau and Cleveland Street***, behind the Fitzroy Place development. This has the advantage of being right next to All Souls school; the school has some facilities granted for it's uses in Fitzroy Place, so a play area would offer a safe passage for children.

The other advantage is that the area is much closer to where younger people live and need space to play.

