

FITZROVIA WEST NEIGHBOURHOOD FORUM

RESPONSE TO THE TRANSFORMATION OF OXFORD STREET WEST CONSULTATION CLOSING ON 3RD JANUARY 2018

1. Introduction

1. **Fitzrovia West.** On 28 March 2014, Fitzrovia West (“our Area”) was designated as a business neighbourhood area: see <https://www.westminster.gov.uk/neighbourhood-areas>. The area is bounded by Great Portland Street (both sides), Euston Road, the Eastern boundary of WCC – roughly Cleveland Street - and Oxford Street (north side).
2. Our Area contains the highest concentration of residents in the West End District and a large and varied range of businesses including the University of Westminster, well-known restaurants, media and publishing companies, showrooms, art galleries and offices.
3. **The Forum.** On 5 February 2015, we were designated as a business neighbourhood forum. Further information about the history of the Area and Forum can be found in the application for designation: <https://www.westminster.gov.uk/neighbourhood-forums>.
4. Our mission is to ensure that Fitzrovia develops as a habitable, sustainable and neighbourly community through all means available including planning, collaborative working and community enterprise. Our objectives are:
 - a. To promote the social, economic and environmental well-being of Fitzrovia, collaborating with Westminster Council and other relevant bodies.
 - b. To produce, and help to implement a Fitzrovia West Neighbourhood Development Plan that delivers the vision of the Forum and the wider community.
 - c. To help foster community spirit and encourage local democracy and civic pride.

Please visit our website for further details: <http://fitzwest.org/wordpress/>.

5. **Input to this Response.** We held a public meeting on the 21st November 2017, consulted membership via email and talked to businesses and residents in our Area.
6. **Focus of this Response.** Although the proposals concern Oxford Street West, they would have a clear impact on our Area. We focus on the potential impact for people who live and work in our Area and in particular on the following:
 - a. Traffic & congestion.
 - b. Air pollution.
 - c. Accessibility.
 - d. Oxford Street West if pedestrianised.

2. Summary of our response

7. FitzWest is unable to support the proposal to pedestrianise Oxford Street West in its current form.
8. The starting point is that the consultation process, based as it is on an artificial split between East and West, is fundamentally flawed and involves a major loss of opportunity to transforming Oxford Street and its surrounding area into a vibrant public realm (paras 13, 14 and 17 below).
9. Looking at the evidence presented by WCC/TfL, it is hard to avoid the general impression that the analysis was done in great haste, resulting in partial and incomplete data (para. 15 below – this is elaborated later on).
10. We believe that the proposed scheme would substantially prejudice our Area in terms of:
 - a. increased traffic congestion and associated air and noise pollution (paras 19-35 below); and
 - b. Significant reductions in accessibility to and from our area (paras 36-48 below).
11. Looking at the proposals for Oxford Street West itself, we are concerned about:
 - a. future mobility along Oxford Street (para. 51 below);
 - b. the failure to make any adequate provision for cyclists (paras 52 and 53 below);
 - c. the limited and generally inadequate proposals for the public realm (paras 54-57 below);
 - d. the loss of access to green space (para. 58 below); and
 - e. Likely reductions in safety and security at night (paras 59-61 below).

12. None of this is helped by the fact that the scheme would require funding for maintenance and enforcement, and it is clear that no funding has been secured for this.

3. General considerations

13. **The artificial division of Oxford Street.** The Mayor was elected on an unambiguous policy to “Work with Westminster Council, local businesses, Transport for London (TfL) and taxis, to pedestrianise Oxford Street.¹” The *whole* of Oxford Street. Nevertheless, the Consultation process involves a division of Oxford Street into two artificial parts which are going out to consultation sequentially. There is no obvious rationale for this. It gives rise to a number of serious concerns:
14. **A lost opportunity.** There is huge potential for transforming Oxford Street and its surrounding area into a vibrant public realm. It is obvious that that would best be achieved by an integrated plan covering the whole area.
15. **Very little attention has been given to the impact on our Area.** This is clear from the terms of the Consultation document. Indeed, it was only once we had requested it that the area around Great Portland Street was included as part of the assessment process undertaken by the WCC/TfL team. This lack of attention to our area is developed further below.
16. **Inability to comment properly.** It is clear that proposals for Oxford Street East - i.e. our Area - have not been developed. This makes it difficult to assess the overall impact on our Area and impossible to comment on the overall impact of the scheme on the ‘Oxford Street District’ - East and West combined.
17. **We suspect we are going to be presented with a fait accompli.** We suspect that if the Oxford Street West pedestrianisation is approved we will be presented with a fait accompli. We are strengthened in our suspicion by the fact that there has been so little investigation into the impact of the plans on our Area.
18. **Costs.** A final general point is that it seems that little consideration has been given to the costs of maintenance and enforcement.

4. Traffic and congestion

19. We had hoped that the scheme might actively offer a reduction in overall vehicle usage and traffic in our area. Sadly, that does not seem to be the case.
20. **The traffic modelling process.** We consider that this process has been inadequate for the following reasons:
- a. It is not possible to understand the assumptions behind the modelling.
 - b. The modelling measures traffic volumes but not average speed. Accordingly, contrary to established practice (e.g. the modelling used to assess bus speeds), it fails to provide any measure of the likely increased congestion.

¹ http://www.sadiq.london/a_greener_cleaner_london [Accessed 9 December 2017]

- c. Coverage of our Area has been superficial at best. For example no attempt has been made to cover Mortimer Street, New Cavendish Street to the East of Portland Place or Oxford Street East.
- d. We think that some of the anticipated changes are implausible. See para. 21 below.
- e. The treatment of taxi movements is unsatisfactory. See further below.

21. **Modelled predictions.** The model predicts substantial increases in Great Portland Street and Newman Street. We think this substantially underestimates the likely effects on our Area. Displacement of taxis, lorries and other traffic into Fitzwest is inevitable. In addition, TFL's preference (although this needs to be clarified) seems to be to prohibit night time servicing of businesses on Oxford Street altogether. This will increase deliveries via side streets causing more congestion.
22. **Extent of displacement: general.** Oxford Street is used mainly by taxis (between 300-450ph- peak demand) and buses (75 bph each way) (these are the figures which were presented for Oxford Street West, and we see no reason to doubt that fairly similar figures apply east of Regent Street).
23. Wigmore Street shows at peaks around 300-350 taxis, 320-350 cars and private hire vehicles, 150 freight vehicles and others. Once again, it is reasonable to assume similar volumes for Mortimer Street in Fitzrovia, as no figures are available for our area.
24. Very substantial displacement of Oxford Street non-bus traffic into surrounding streets would be inevitable. That traffic would find its way into our Area, and using apps like WAZE, drivers would take alternative routes consisting of narrow and residential roads. In addition, the existing main thoroughfares such as Mortimer Street would become even more congested.
25. We already know that there are relatively high incidents of accidents and pedestrians along Mortimer Street: see <http://www.crashmap.co.uk/Search>. The extra congestion and heavy usage of vehicles in our area would – unfortunately - increase the rate of accidents.
26. Extra congestion would also act as impediment to businesses here, great and small, because it would increase costs of deliveries and doing business in Fitzrovia. This would be unacceptable. Small businesses along Mortimer Street and Goodge Street are very concerned about this, not least because when traffic was diverted from Oxford Street in 2008/9, there was a drop in their takings.
27. **Taxis.** There are additional question marks over the movement of taxis accessing Oxford Street East. Taxis would not necessarily use the same routing as buses to get to Oxford Street East. In fact it is likely that they would use any available north/south route. This is very important, given the high number of taxis using both Oxford Street and Wigmore/Mortimer Streets. The traffic model does not provide a satisfactory prediction as to what taxis and private hire vehicles would do. Again, the likelihood is that the

drivers would be guided by popular Apps like 'WAZE' to find their way to their destination - and WAZE chooses side streets and quiet "back roads".

28. **Mortimer Street/East-West axis: specific problems.** At the moment Mortimer West of Great Titchfield Street is Eastbound only. Subject to the outcome of the Oxford Street West consultation it is planned that this part of Mortimer Street should become two-way, thus joining it up to the Wigmore Street-Cavendish Place East-West axis.
29. This is the main alternative to Oxford Street and used by commercial traffic, taxis and private hire vehicles such as Uber. As such, it is already heavily congested – in Fitzrovia we sometimes refer to it as the 'wall to wall of white vans'. Peak traffic occurs between midday and 7-8pm. This commercial traffic is vital to the commercial wellbeing of our Area. Those roads are the "blood vessels sustaining commercial life" in Fitzrovia.
30. Making Mortimer street fully two way and providing for bus/cycle/taxi only access to Margaret Street would increase traffic volumes and congestion in Mortimer Street. The position would be exacerbated by the fact that making Mortimer Street two way at the junction with Great Titchfield street would necessitate re-timing the traffic lights, prolonging 'traffic phase waves' across the junction and creating more traffic queuing both ways.
31. The commercial traffic using Margaret Street westbound would be displaced to alternative road space - such as Mortimer Street or Little Portland street, bringing much higher traffic volumes – and more noise (canyon effect) to streets like Little Portland Street.

5. Air and Noise Pollution

32. **Introduction.** Fitzrovia already suffers from heavy air pollution, with detrimental impacts on health and wellbeing which are well known. We accept that in future years, if traffic does not increase, and the Mayor implements his clean vehicle policies, air pollution (mainly No. 2 emissions) would be reduced.
33. **The air pollution model.** The Consultation model seems to us to be fundamentally inadequate:
 - a. It is based on figures collected mainly in Heathrow together with partial figures from Marylebone Road and Oxford Street/Selfridges monitoring stations. The figures were only taken over a period of one month when proper practice dictates that they be taken over one year. Given that most data is extrapolated from remote locations such as Heathrow, there is a variance of plus or minus 10-15% in the pollution figures presented. This is unacceptable as a basis for policy making.
 - b. With the exception of a single location on the West side of Great Portland Street, where diffusion tubes were put in at our request, the Consultation has

not addressed the effects on pollution and noise in our Area. Again, we feel that the effects on our Area have been unfairly ignored.

34. **Impact on our Area.** The very limited figures for the West side of Great Portland Street and other locations near the West side of our area show significant high pollution levels right now, and no reduction in pollution levels in 2021 if the proposals in the Consultation go ahead.
35. These figures are open to question in any event because a separate project undertaken by Summer 2017 using diffusion tubes showed a pollution level of 59 (No. 2) in Charlotte Place - significantly higher than the figure of 50-51 quoted in the pollution report.
36. Air pollution depends on the number of vehicles, congestion as well as engine emission standards. So, increased congestion and increasing traffic will inevitably increase pollution levels. Even on a best case scenario, it is clear that pollution levels are not likely to decrease significantly to below the harmful levels they are currently at.

6. Accessibility by public transport

37. **Introduction.** We have a large residential and working population who rely on public transport, as car ownership is relatively low and parking very limited. A significant number of residents in our Area find it impossible to use the Underground for reason of accessibility and rely on buses. Many workers, particularly those in low paid jobs, are wholly dependent on buses to get to and from work. In the past two years, there has been a 40 per cent cut in bus numbers serving Oxford Street - down from 120 buses per hour ("bph") to 75 bph. However, this was achieved while maintaining the existing well established and well used bus network.
38. **Underground services.** We acknowledge that Tottenham Court Road and Bond Street stations will be user accessible friendly stations once the Elizabeth Line opens. However, that will not be the case for other local stations.
39. **Bus services: the Oxford Street West Consultation.** The proposed scheme would involve a drastic reduction in bus services serving Oxford Street West. Such services would be reduced from 9 bus routes at 75 buses per hour to two routes (139 and 390, diverted via Wigmore Street).
40. Figures for bus route usage taken from TfL/Buses web source show that bus usage over the last 7 years fell by 18 per cent. Yet the proposals call for a 75 per cent reduction - this is out of all proportion to the trend of the reductions in actual usage. Residents have recognised this and are seriously concerned about it.
41. Other routes would be curtailed at the boundary of the Oxford Street area - the 7, 98, 94, 10 and 23 (merged) and 113 would terminate at Marble Arch and the 159 would terminate at Oxford Circus. This would represent a huge loss of direct routing west of Oxford Street - to Bayswater, Notting Hill, Shepherd's Bush, the Westfield shopping

centre, Knightsbridge, Kensington, Hammersmith, and the Edgware Road/Paddington area.

42. For these services, the interchange to other bus services would be at Marble Arch. The interchange facilities here are poor, and would be hard on impaired passengers with limited or impaired mobility. In particular it is necessary to cross a very busy 'roundabout' from Park Lane – southbound, and onto the first bus stop northbound at Edgware Road - and vice versa. It is a fair distance of several hundred yards to navigate. It is not entirely clear how easy interchange would be possible with the loss of route 94 service to Notting Hill Gate and beyond.
43. Almost all daytime routes serving our Area have 24/7 service, either directly (e.g. route 12) or as a variant of a daytime route (e.g. route N73). Therefore any proposed re-routing of those services, whether in service or out of service (to and from their bus stands) might have an impact on residential amenities. None of this is referred to in the consultation document.
44. It seems to us that no serious attempt has been made to address the real difficulties that this bus cull will cause for many of the people who live or work in our area, including some of the most disadvantaged in society. The cull runs contrary to the Mayor's draft vision for a Diverse and inclusive city, in particular Priority Outcomes 1.3 An inclusive city,² 4.1 Affordable transport and 4.2 Inclusive transport network.
45. **Bus stands and terminals.** The consultation document proposes new bus stands and terminals but does not explain exactly where they will be, which routes would be using each stand, and how the buses would travel to and from those stands. However, it seems to us that the proposed bus stands at Great Portland Street and Great Castle Street are far from ideal locations.
46. Great Castle Street is used for deliveries to a large commercial building occupying the whole block between Regent Street, Oxford Street and Great Portland Street. Very large lorries have to reverse into the two loading bays - standing perpendicular to the street, with the front protruding on to the pavement. It is hard to imagine that when two buses (11.3m long and 2.55m wide) are parked up there, there would be sufficient room for everyone. Indeed, this proposed stand would replace a stand for route 55/N55 in Holles Street which has space for and is often used by 3 buses. As there are no frequency reductions planned for the route, it is hard to see how this newly identified space would be adequate.

²https://www.london.gov.uk/sites/default/files/microsoft_word_-_final_diversity_and_inclusion_vision_for_publication_lo.pdf [Accessed 30 December 2017]. See in particular p. 13, which includes the following: Effective planning, involving local people, will create an inclusive city that is welcoming to all. It includes areas where people of different ages, ethnicities and backgrounds feel comfortable, safe and can interact meaningfully. Promoting good design is a critical part of effective planning. It improves the health, wellbeing, and quality of life of all. In particular, disabled and older Londoners will benefit from accessible and safe neighbourhoods. Inclusive neighbourhoods will be designed to make journeys easier – whether they be from residential areas to bus stops, green spaces, walking routes, stations, parking, doctors' surgeries, hospitals, schools and places of worship.

47. Great Portland Street. The proposed stand is on the Northbound carriageway between Oxford Street and Great Castle Street. It has room for 2 buses according to the drawings. This stand would be used by route 25, replacing a space for 3-4 buses in Holles Street. Once again, assuming existing frequencies and current schedule, it is hard to see how this is adequate.
48. This section of Great Portland Street is narrow. Southbound traffic includes buses (route 390 in the proposals), taxis and other commercial vehicles. The Northbound traffic would include buses terminating at Great Castle Street and further on (routes 55/N55 and 73/N73). These bus routes are high frequency routes and if the bus stand were full, there would be no room to manoeuvre if Northbound and Southbound buses passed at the same time.
49. **Buses in the event of pedestrianisation of Oxford Street East**. If pedestrianisation of Oxford Street East were to take place it is wholly unclear what would happen to buses going East of Oxford Street. We are aware of the plan to transform the Tottenham Court Road and Gower Street area, and if Oxford Street East were pedestrianised, the following serious issues would arise:
- a. How would the east-west bus link (routes 8, 25 and 55) to the City area be maintained?
 - b. How route 390 would be routed around our area, as it would be the sole bus route linking us to Euston and Kings Cross and Victoria. The issue of course is Goodge Street which in part is a one-way street. We strongly oppose rerouting the 390 down Mortimer/Goodge Street and making Goodge Street two-way from Charlotte St to Tottenham Court Road, thus reducing the existing pavement widths.
 - c. How would the through bus link from Marble Arch to Tottenham Court Road and beyond which is currently provided by routes 10, 98 and 390 be maintained?

7. Oxford Street West if pedestrianised

50. **Introduction**. Many of our residents and workers use Oxford Street West and would be affected by the pedestrianisation of this street. We have identified a number of issues.
51. **Travelling along Oxford Street**. The section between Regent Street and Selfridges is 800m long. The whole of Oxford Street is 2.5km long. There are presently at least 30 buses per hour over this route – currently served by routes 10, 390 and 98 across the whole of Oxford Street. In the absence of vehicular facilities, it is hard to see how people with mobility issues would be able to move along Oxford Street, whether they were shopping or otherwise engaged. This would arguably discriminate unacceptably against such persons.
52. **Cycles**. Oxford Street is extensively used by cyclists. Many residents and a fair number of workers cycle to and from work. The proposals do not adequately address issues of cycling. On the contrary, cycling along Oxford Street West is to be prohibited altogether

yet the proposals do not provide for any alternative cycle routes. In particular, they make no attempt to provide a credible East-West cycle route (something that we support). Our concern is that the lack of detailed planning and decision to postpone this issue to a later stage may result in nothing being done, as there is no funding secured for the second stage.

53. As matters stand, the proposals are contrary to the Mayor's draft vision for a Diverse and inclusive city, in particular Priority Outcome 4.3 Healthy streets which includes a proposal to develop and deliver plans "to make our streets inclusive for everyone who wants to walk or cycle more".³
54. **Public realm.** There is little in the proposals to address public realm issues in our Area at this stage. The proposed changes to the public realm are strictly confined to routes to and from bus stops – around Wigmore Street, the Cavendish Square area and Henrietta Place. There is no attempt to address the whole Oxford Street 'hinterland area', and there is no funding allocated for doing that.
55. The lack of funding means that maintenance and enforcement are not going to be possible in practice. We only have to look at rather sorry state of Market Square to see what happens when those two issues are neglected. It does not look anything like the pleasant green and inviting place for people to rest and relax in which it was intended to be.
56. The proposed multi-coloured surface is not in keeping with the traditional look of the Oxford Street West area, and it looks cheap and tatty. The provisions for public rest places – benches etc. - look cheap and uninviting. We deplore the lack of provision for public toilet facilities. In addition, there is no reference in the consultation document to any proposals to plant of new trees: another major missed opportunity.
57. We are also very concerned that there is no funding for the second stage, which is meant to address improvement to public realm in the surrounding area, other than the strictly necessary changes directly linked to the scheme.
58. **Green space.** The proposals involve a significant loss of access to the rare green space in Cavendish Square. It seems that the area is going to be turned into a huge parking area for taxis and buses. We are concerned that not enough attention was given to making the green space welcoming and accessible.
59. **Public safety/Oxford Street at night.** The consultation document does not explain what is proposed to happen in Oxford Street once the shops are closed for the night and later – after 23.00. With so much empty space, accessed by numerous alleyways, it has the potential to turn into a haven for anti-social activities, roller skate users, homeless people, pedicabs and street performers (the latter are already an issue around Oxford Street, especially those using amplified music). People are likely to fear for their personal safety when using the street at night.

³ Page 31.

60. Unfortunately, the consultation document does not offer a credible management scheme, complete with enforcement and identified funding stream.⁴
61. We would add that in our area, Oxford Street East has a different profile and we have a recurring drug dealing problem which must be kept under control. We hope that the OSE scheme would address this issue in detail.

1 January 2018

⁴ In an interview on Soho Radio on 21 December 2017, Mr Sam Monk pointed out that TFL has suffered a £700m per annum funding cut and the need to be “creative” in relation to funding sources. We would be concerned if significant funding came from frontagers whose views as to how it should be spent would inevitably be given undue priority over those others.