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Cllr Robert Davis MBE DL, Deputy Leader and
Cabinet Member for Business, Culture and Heritage,
Westminster City Council

Val Shawcross, Deputy Mayor for Transport

Mike Brown MVO, Commissioner, Transport for London

Dear Robert, Val and Mike

RE: Consultation on proposed transformation of Oxford Street

I would like to thank you for the opportunity to comment on the strategic proposals to transform Oxford Street.

The proposals represent a welcome review of this important central London location. Oxford Street, like many in the capital, suffers significant transport challenges, particularly air pollution and footway overcrowding, which are likely to be exacerbated with the imminent introduction of the Elizabeth Line as well as future growth. These challenges have consequences for health, road safety and, accessibility which, if ignored, could undermine the economic success of the street, its competitiveness with other shopping centres such as Westfield in attracting people to central London, and London's reputation as a world-class city.

The proposals focus on options to significantly reduce traffic, mainly buses, and traffic dominance to enable the creation of a cleaner, safer, and more attractive place to visit and enjoy. Camden is very supportive of these strategic aspirations: they align to our wider transport objectives, which have directly informed our own proposals for Tottenham Court Road and surrounding area (the West End Project). They also help to deliver the Mayor's Healthy Streets agenda which we support as a holistic approach to improving London's streets. We therefore support the vision to transform Oxford Street and look forward to working together to address any concerns we have about the impacts, particularly in Camden, which I highlight below.

General

We welcome the vision for Oxford Street, but this must be seen in the wider context of the area. Our view is that, without a vision for a much wider area, this approach could simply displace problems to parallel, and possibly less appropriate streets, and which could undermine the ability to deliver the transformation. It is also important as part of this process to consider how the proposals align and interact with other existing and planned

improvements in the wider area, particularly the West End Project and Holborn Project in Camden. Indeed, we are very clear that proposals for Oxford Street should not impact or amend the transformative, approved scheme for the West End Project, as previously committed to.

We acknowledge that there are likely to be impacts for Camden and these will be discussed with you as the proposals are progressed and more detailed information becomes available. However, the balance between pain and gain will itself be a key consideration for Camden, as we would want any benefits to significantly outweigh the disadvantages and make any pain worthwhile in terms of the transformation. An example of that is striking the correct balance in terms of servicing requirements for shops and businesses, which may be impacted by these proposals. We will also pay close attention to impacts on Camden's residential communities in the West End to ensure that their interests are carefully considered, and we thank you for the interest you have already shown in hearing local views.

A motor traffic free route on Oxford Street is optimal during the day when footfall is at a peak. Proposals that maintains taxi and bus access at reduced volumes will not deliver the transformational changes envisaged for Oxford Street as a place nor fundamentally improve the experience of pedestrians. We are aware that there are mixed views on traffic-free streets which, some view, can become 'dead' areas after normal business hours. To mitigate this, it may be necessary to consider allowing some traffic overnight, but this should be assessed against a full range of more ambitious options. In particular, providing delineated carriageway space would undermine the extent to which the public realms could be truly transformed and a transition period from traffic free to allow buses will present road safety challenges. There are examples of extremely successful pedestrianised areas, both in the UK and in Europe, where, due to the absence of traffic, a new and more varied offer has emerged. This can includes pop-ups, events and leisure activities which, while using the space differently, help to ensure it stays active, safe and economically productive.

Buses

Buses are the most accessible form of transport so relocating all buses away from the street may exclude some groups, particularly vulnerable people, which the transformation aims to attract. The detailed proposals will need to balance the aspiration for a traffic-free environment with making Oxford Street accessible to as many groups as possible.

It is not clear which east-west bus routes would terminate early, and where the termination and turn-around points would be and we look forward to these discussions when the detailed proposals are presented. It should be noted, however, that Camden provides several bus stands in the Tottenham Court Road area, including three on St Giles for routes 242 (route 8 in the future), 134 and 1, as well as route 176 on Great Russell Street. We would not be able to provide any more space for bus stands in this location, or elsewhere in the Camden area of these wider proposals.

In addition, the West End Project traffic restrictions for buses and cyclists only on Tottenham Court Road from Monday to Saturday, between 8am to 7pm, do not align with the current proposals for Oxford Street. We will need to work together to ensure that any

proposed changes to traffic routes, as they interact with the West End Project, do not confuse drivers or unnecessarily increase the level of street signage.

Terminating bus routes early may also affect those from more deprived backgrounds from accessing jobs and opportunities. Buses are cheaper than rail and underground services, and while the Elizabeth Line and the Underground will continue to serve Oxford Street itself, this could impact on those who rely on buses for their end-to-end journeys. In this context, we welcome the introduction of the Hopper fare and will consider proposals for buses in terms of routes to work for low paid Camden residents who need to travel to central London.

As outlined in previous consultations, we request that route 390 is retained as a continuous route as part of the transformation of Oxford Street. Route 390 is a key link in Camden, serving the new Kings Cross Central development site, which is a major growth area, and beyond. Camden has worked with the developer Argent to secure financial contributions to improve this route to respond to increasing demand, and we want to ensure that it is maintained.

We also want to take the opportunity to highlight again Camden's longer-term ambition to close Great Russell Street as part of a transformational scheme for Holborn. The Phase 1 proposals for Oxford Street have now resulted in two additional bus routes using Great Russell Street – routes 10 and 3 – which present Camden with some challenges to identify alternative alignments for these routes should the proposals for Great Russell Street be progressed. It is not clear whether the impacts of the West End Project have been taken into account for the proposed new alignment for Route 3 via Great Russell Street and to Russell Square. For the southbound journey, the banned right turn from Bloomsbury Street into New Oxford Street as part of the West End Project will result in a longer journey via the St Giles loop, which could affect journey times in the future. Terminating the route at St Giles may therefore be of benefit for buses, although this would have to be at the expense of, and not in addition to, an existing stand.

Cycling

Camden places pedestrians first and cyclists second in its transport hierarchy and will apply this approach to consideration of Oxford Street proposals. We acknowledge that it may not be appropriate to allow cyclists to travel the length of Oxford Street given the scheme objectives and possible impacts on pedestrians. However, it is appropriate to consider what access can be accommodated via side roads for people cycling to the area.

Most importantly, it is crucial that a high quality alternative east-west route for cycling is provided if Oxford Street itself is not judged appropriate. This should link up and be comparable in quality with planned cycling routes in Camden. In particular, a busy central London environment means the aspiration should be for segregated cycle infrastructure that encourages less confident cyclists to use the routes and facilitates modal shift from polluting forms of transport.

We have major concerns about use of Wigmore Street as the alternative alignment if buses and taxis are diverted to this corridor. Wigmore Street, while not ideal, is currently the preferred cycle route precisely because Oxford Street is perceived to be challenging

and unsafe particularly due to the large numbers of buses and taxis. Wigmore Street is quite narrow in many parts; it is already heavily trafficked with extensive 24 hour waiting and loading provision. Relocating buses and taxis to this preferred cycle route, introduces additional potential conflicts, particularly at junctions, which will significantly jeopardise cycle safety.

An approach which better accommodates cyclists' desire lines, provides a key, connected link in the Central London Cycle Grid while also enabling them to access Oxford Street, is needed. High quality parallel routes will be required close to Oxford Street from which cyclists will be able to access Oxford Street on excellent north/south connections, complemented with extensive cycle parking.

Taxis

As the consultation material makes clear, taxis are a highly inefficient use of limited road space in central London, comprising almost a third of traffic on Oxford Street but just two per cent of trips. Taxis are also responsible for a very large component of air pollution on the street, which is a severe health and reputational threat to the whole of central London. The uncontrolled increase in private hire vehicles (PHV) in recent years exacerbates these congestion and air quality problems.

It is accepted that taxis and PHV have a role to play in the mix of transport provision in central London, including on Oxford Street and Tottenham Court Road, for example in providing access for disabled people (although far higher proportions of disabled people use other modes of transport, such as buses). Taxi access and management of ranks needs to be carefully managed within plans for Oxford Street, but more sustainable and efficient modes of transport, particularly walking, cycling and buses, must take priority. Camden will support restrictions on taxi access that help achieve the overall project objectives.

In conclusion, the vision for Oxford Street, which should build on (not amend) Camden Council's vision for the West End Project area, provides an exciting opportunity to truly transform this part of central London. Camden supports the vision and encourages bold action, subject to mitigating the wider impacts. We look forward to continuing to work with you to develop the proposals further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Jones', with a stylized, flowing script.

Councillor Phil Jones

Cabinet Member for Regeneration, Transport and Planning