

CONSULTATION RESPONSE: Transformation of Oxford Street

03 January 2018

Introduction

Baker Street Quarter Partnership (BakerStreetQ), the Business Improvement District (BID) serving Baker Street and Marylebone, was established in 2013 by a core group of businesses to bring a newfound purpose and focus to the area. Representing over 200 business organisations, its vision is that the area is:

- The commercial district of choice;
- Welcoming and first class that supports business operations and promotes staff wellbeing; and
- A place people want to work, are keen to visit, eager to explore and happy to live.

The Partnership has a particular focus on providing quality spaces and streets, improving air quality and reducing the dominance of traffic.

In addition to our business occupier and land owner members we work closely with a range of key stakeholders such as The Portman Estate, New West End Company, Marble Arch Business Improvement District, the Howard de Walden Estate, the West End Partnership, the Marylebone Association and the Marylebone Forum, as well as Transport for London, The Great London Authority and Westminster City Council.

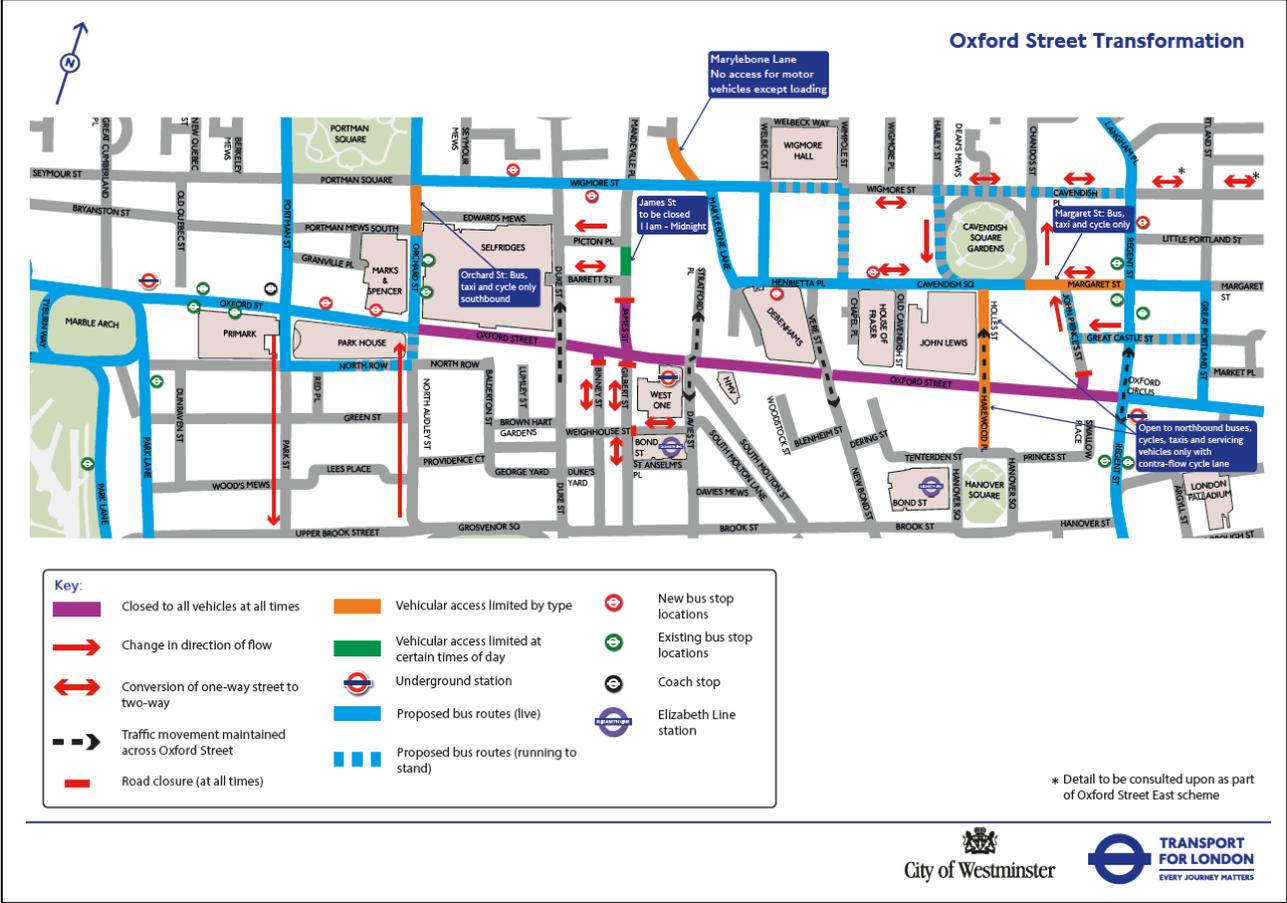
The area we have responsibility for lies largely between Marylebone Road to the north and Wigmore Street and Portman Square to the south, Chiltern Street and Manchester Square to the east and Gloucester Place to the west.

Context

Following consulting in the summer on the principles of transforming Oxford Street, Transport for London (TfL) and Westminster City Council (WCC) are now consulting on detailed proposals for the first phase of the project (Orchard Street to Oxford Circus).

The Oxford Street Transformation project and proposed removal of traffic to some extent from Oxford Street is of course a significant undertaking, with a range of strategic and tactical complexities that cannot all be addressed and implemented concurrently. The approach being adopted by the project team is a phased one:

- Phase One – is the one currently being consulted on and is focused on Oxford Street between Orchard Street and Oxford Circus.
 - Should the project get the go ahead the first stage of phase one would be works to prepare for the opening of the Elizabeth Line at Bond Street in early December 2018. These would be preparatory works needed in order for Oxford Street to cope with the anticipated increased numbers of people the new station will bring.
 - These preparatory works will form the traffic movement foundation upon which longer term or ‘transformational’ improvements to the Oxford Street District can be based. It is understood this would be more comprehensive improvements to the public realm and pedestrian environment – funding for these transformational works is being sought from Government, the Local Authority and the Private Sector. Plans for the transformation works will be put forward at a later stage – timing is as yet unclear.
- Phase 2 –This will focus on Oxford Street from Oxford Circus to Tottenham Court Road. No proposals are being put forward for this at this stage and no funding is confirmed. A separate consultation on these will be held (it is proposed in Summer 2018) with intended date for traffic removal late 2019/early 2020.
- Phase 3 – it is intended that this will focus on Oxford Street from Orchard Street to Marble Arch. No proposals are being put forward for this at this stage and no funding is confirmed. A separate consultation on these will be held in due course with intended date for traffic removal ‘Post 2020’. The absence of a commitment to a timescale is noteworthy.



(above) Overview of Oxford Street Transformation (TfL/WCC)

You can read about the detailed proposals and respond individually to the consultation on the TfL website: <https://consultations.tfl.gov.uk/roads/oxford-street/>

Our Response

Summary

- BakerStreetQ welcomes the broad principles of the scheme to transform the Oxford Street district. We have taken some time to consider the detail of the proposals being put forward and as you will see below have discussed them widely with our members. We are grateful for the level of information provided as well as the openness of the project team to dialogue and discussion. We are keen to continue this discussion and in particular are seeking reassurances on the four substantive points summarised below which, with regret, currently leave us unable to support the detail of the proposals. We are hopeful that with further dialogue these points can be addressed enabling our support. We have provided more detail on these points and a number of other aspects of the proposals below.
- We are particularly concerned about the approach to the Marble Arch to Orchard Street section, which has no definitive timescale or funding guarantees to make improvements. It is imperative that this section is included from the outset, to prevent this gateway to the wider area being blighted for the foreseeable future.
- We have reservations about the impact on streets immediately north of Oxford Street, some of which had been due to received upgrades through the Baker Street Two Way project and Duke Street scheme, but are now at risk of increased impact from taxis, buses, and deliveries.
- Overall the preparatory or transitional public realm proposals, while welcome, do not go far enough to deliver a truly district wide transformation. Without funding for additional public realm interventions the transformation will be compromised and unable to live up to the stated ambition of the scheme to improve the whole district, not just Oxford Street. In particular, the level of investment in the side streets to the north and south, that will bear the displaced traffic, is not sufficient as things stand for our support. We are particularly concerned regarding the lack of pedestrian links to the surrounding area and historic squares, such as Manchester Square.
- Significant work is still required to resolve the servicing and delivery plans for the proposed transformation, and the lack of an agreed maintenance and management plan makes it impossible to assess the 'human' aspects of the scheme. In relation to this we are not supportive of 24/7 closure and in line with other stakeholders would like to see closure to traffic between 7am and 11pm only to reduce risk of misuse of the space and ease pressures on deliveries to retailers and other businesses. A much more comprehensive strategy for waste and deliveries consolidation, and active support from the Mayor in providing the necessary physical facilities, would go a long way to alleviate concerns about the impact on surrounding areas.

Marble Arch to Orchard Street (Marble Arch 'section')

- BakerStreetQ, alongside Marble Arch BID, the Portman Estate and other stakeholders local to this area, are particularly concerned about the approach to the Marble Arch to Orchard

Street section, which has no definitive timescale of funding guarantees in the proposals. It is imperative that this section is included from the outset, or this gateway to the wider area will be blighted for the foreseeable future.

- Marble Arch is a key gateway to the Baker Street area and has significant investment secured from the private sector. However, the benefits of that investment could be seriously undermined by the increased traffic displacement and bus infrastructure required to facilitate the western phase of the project. This could blight the shopping experience for years to come, making units hard to let and with no guarantees that any future improvements would be forthcoming.
- Currently there are major retail anchors to the west of Orchard Street (including Primark and Marks & Spencer), however the proposals will not support the long term future of key anchor stores on this part of Oxford Street.
- Marble Arch as a public space and the Grade I listed monument itself has been overlooked as an opportunity. Surrounding bus stands and stops obscure views and impact the setting of the listed monument, and further support the need to include the westernmost section of Oxford Street in any transformational scheme. We are seeking assurances in this respect.
- There is a need to make Marble Arch a step-free station to ensure there is access to the London Underground at the western end of Oxford Street, and not necessitate a journey back to Oxford Circus for lift access. This can be facilitated on the central gyratory.
- There is a need to see the justification for the proposed approach to hostile vehicle mitigation for this area (e.g. Primark is outside the zone of protection). This end of Oxford Street could be made more vulnerable in relation to other parts of the consulted scheme further east along Oxford Street, particularly with the landmark Marble Arch location.
- Kerbside servicing hours in this westernmost extent of Oxford Street could be controlled in the scheme, even if it has different traffic management to the pedestrianised areas so as not to disrupt the shopping environment.
- Overall, much greater attention is needed on the public realm of this stretch if it is not to become a place people pass through to reach the newly pedestrianised section of Oxford Street. We are disappointed that this section has not been incorporated into the first-phase, wider proposals and call on that decision to be reversed.

General Highway changes

- BakerStreetQ welcomes the transformational opportunity of the full pedestrianisation of the western section of Oxford Street. The opening of the Elizabeth line in December 2018 necessitated a major intervention to deal with increased visitor numbers. Some of the key concerns and priorities from our response to the April 2017 consultation have been addressed, such as maintaining north-south links across the street.

- However, there is still disproportionate impact to the north of Oxford Street compared to the south without requisite investment in the public realm.
- We ask that WCC and TfL continue to monitor and verify their traffic modelling findings so that Marylebone is not significantly affected by the transformation.
- As it stands the Oxford Street transformation could compromise long fought for changes and benefits of the Baker Street Two Way project and Duke Street schemes, which is deeply concerning for those who have campaigned for them for many years, and are now funding their implementation.

Portman Street / Orchard Street

- We are concerned in general about the impact on streets immediately north of Oxford Street, some of which had been due to received upgrades through Baker Street Two Way project and Duke Street scheme. In particular, Orchard Street, Portman Street, Portman Square, Portman Mews and Granville Place, could become dominated by buses, taxis, chauffeurs, and deliveries. This would undermine the district vision and the specific functions of these streets.
- We would also query if major consented developments notably the new Qatari hotel in Grosvenor Square have been fully considered in the in future baseline model, as this opens up the western arm of the square with potential for additional traffic heading up North Audley Street and Orchard Street.
- The high numbers of bus stops on Orchard Street will undermine the quality of the visitor experience in the street space, to the detriment of the two major attractions of Marks & Spencer and Selfridges trading from Orchard Street frontages. The proposed southbound stop on Orchard Street is in close proximity to the stops on Baker Street and Wigmore Street and Oxford Street. A review of the need for all these stops is requested, with the proposal that the Orchard Street stops are removed, which would have the added advantage of improving bus journey times and improving footway space.
- There is a concern over the impact of proposed limits to vehicle access on Orchard Street from the north limiting access to important servicing and car park access in Edwards Mews. Signage and access controls heading south into Orchard Street may be confusing and if not well designed there may be a risk of directing people though smaller mews streets. In particular there is a concern that Portman Mews South will become a rat run with the current permitted vehicle movements.
- The proposed reduction of footway space on the Oxford Street corner outside Marks & Spencer is a concern and detrimental to pedestrian safety at a collision hotspot.
- The coach stop on Portman Street should be removed onto Park Lane with the other coach parking facilities, so that coaches use the Edgware Road route rather than Gloucester Place. This would benefit residents, and improve road layout and kerb geometries as buses can make tighter turns.

Wigmore Street / Seymour Street

- We are pleased that new green phase pedestrian crossings will be provided along the length of a two-way Wigmore Street and at the junction of Seymour Street / Great Cumberland Place. Ideally these would go further to improve the pedestrian experience, and be implemented all the way to and including the junction with Edgware Road. However, given the major east-west role this route will play there is limited investment in the wider public realm and we would ask that this be reconsidered.
- We are supportive of further reduction in bus services, with the current reductions already having a positive impact and welcome only diverting the 139 and 390 routes onto Wigmore Street. However, there is little to suggest any similar action to reduce overall traffic volumes, in particular the very large number of taxis and PHV movements we would expect.
- The creation of simple two-way east-west route along Wigmore Street / Seymour Street all the way from Great Portland Street to Edgware Road, despite signalised crossing slowing traffic, may attract significant re-routing not assumed by the model as it will be by far the most legible, if not necessarily fastest, route. WCC and TfL should monitor the impacts closely and consider further interventions if required.

Duke Street / Barrett Street / James Street / Picton Place

- There are significant concerns over the proposals for vehicle access to James Street, Barrett Street and Picton Place with fears that cul-de-sac dead ends and changes to access as proposed will increase the conflict between pedestrians and vehicles in these streets and undermine the Duke Street improvements.
- There is a preference for one-way vehicle movement southbound on James Street and westbound on Barrett Street and Picton Place. Barrett Street is very marginal for two-way traffic and will cause congestion problems, confusion and conflict outside the new Selfridges Duke Street entrance, particularly with the high levels of deliveries and taxi movements that would be expected. Overall this would be better served by a simpler traffic movement. Furthermore, the proposed pedestrian zone on James Street from 11am till midnight combined with the other changes would be detrimental to the pedestrian experience of moving between St Christopher's Place and Duke Street / Selfridges, especially with all-day servicing and the turning of service vehicles on Barrett Street.
- The reduction from three lanes to two lanes at the junction with Wigmore Street, with the subsequent reduction in capacity, will have an impact on vehicles queuing back down Duke Street.

Public Realm

- As it stands, the 'transitional' changes do not live up to the aspiration for a full 'district wide' vision for the area, nor are the possibilities for stronger links with surrounding areas and historic London squares exploited fully.
- In particular, Manchester Square should be included or considered as part of the scheme which has huge potential as a link to respite space and the Wallace Collection.
- Second stage public realm proposals need much greater work to be truly transformative for the wider area, not just Oxford Street, and live up to the aspirations of the healthy streets agenda. Without guarantees over funding for those changes the benefits of the transformation will be largely restricted to Oxford Street and limited in their overall impact.
- BakerStreetQ should be consulted on the second stage public realm proposals, particularly those affecting the westernmost streets and squares to the north of Oxford Street.
- Wigmore Street / Seymour Street public realm needs much further thought given the important role for deliveries, buses, taxis and PHV in the proposals. As it stands, it seems to have been considered as an alternative traffic route, and drop off point for Oxford Street, rather than an important street with its own identity and needs.
- Lack of investment in the section of Oxford Street west of Orchard Street has potential negative consequences and could blight the shopping experience. If not included in the scheme then significant public realm investment and alterations to the proposed highway layouts as outlined above is required.
- The additional pedestrian crossings in the northern sections of the proposals are very welcome and overdue, and we are supportive of interesting street art that enlivens the public realm.
- Additional east-west cycle routes and facilities will be required, and we welcome that detailed proposals will be considered and fully consulted upon in due course.
- Careful thought and lessons from the recent 'scare' at Oxford Circus should be fed into the design process for the public realm to minimise the danger of injuries and crushing.
- There are concerns around the visual and spatial impacts of hostile vehicle mitigation (HVM) measures, specifically their design and locations. More information on the detail of proposed approach to HVM across the scheme would be welcomed. Specifically, how necessary vehicles (i.e. emergency services) could gain access through the HVM lines.
- The current extent of the HVM protection leaves certain areas (notably Marble Arch to Orchard Street) comparatively vulnerable, and as potential soft targets.

Funding

- Overall, we are concerned that the transformation is proceeding without an agreement on funding for the second stage of public realm proposals, the Marble Arch to Orchard Street section, nor for a comprehensive new management plan.
- Without funding for additional public realm interventions the transformation could be highly compromised and fail to live up to the stated ambition of the scheme to improve the whole district, not just Oxford Street. In particular, the level of investment in the side streets to the north and south, that will bear the displaced traffic, is not sufficient as things stand for our support.

Air Quality and Noise

- BakerStreetQ welcomes the robust air quality and noise monitoring and modelling that has been undertaken, and we are pleased that the initial results indicate relatively low localised harms, and overall benefits. There needs to be ongoing monitoring to check against reality and further action to reduce traffic in surrounding district and curtail transport emissions. As a result we welcome the planned approach.
- While bus reduction is welcome. Emissions from buses, taxis and PHV and cars will have to be reduced dramatically beyond current plans and those outlined in the Mayor's Transport Strategy to have a significant impact.
- For such a major intervention, and even accounting for the ULEZ, the positive benefits to air quality are minor, though welcome. This shows the need for genuinely holistic policy and public realm changes across the whole West End in order to achieve sizable air quality improvements.

Deliveries and Freight

- The provision of more dedicated loading bays in side streets is welcome to minimise conflict and prioritise kerb space. However, significant work is still required to resolve the servicing and delivery plans and we hope that TfL and WCC will work closely with all stakeholders to achieve the necessary solution.
- The consolidation of waste and deliveries by BID's has made significant reductions in journey numbers. However, we need a much more comprehensive strategy and active support from the Mayor in providing the necessary physical facilities for comprehensive consolidation. This will not be delivered by the market and is highly unlikely to extend beyond a network of larger premises solely through voluntary business action.
- While an overarching freight strategy for London is outside the scope of this consultation, proper coordinated action by the GLA would potentially relieve a lot of fears in the area over traffic impacts if a comprehensive consolidation plan could be agreed.

Maintenance & Management Plan

- In line with other stakeholders we are not supportive of 24 hour closure to traffic. There is significant concern over the 11pm-7am period, where without oversight from vehicles and large numbers of people the street could become a no-go area. We appreciate that this is identified as a challenge and that there is ongoing discussion about the Maintenance, Activation & Funding Plan (MMAF).
- What the character and activity of a pedestrianised Oxford Street outside of peak shopping hours looks like is not yet defined, despite its centrality to the success of the transformation.
- Increased anti-social behaviour is a serious risk from the transformation without agreement for increased resourcing of the police, and council services. We also have concerns that poor quality street performers will spread north from Leicester Square and Piccadilly Circus to take advantage of new public space. Clear rule setting, or new powers to regulate the space, will be required to manage the street for the enjoyment and safety of everyone.
- Rough sleeping, begging and street drinking is a concern with new street furniture and dwell areas along the street. We appreciate that these issues have been noted for the MMAF but again, new resources and management will be required and we ask for confirmation that these will be provided.
- The management approach has an impact on the wider area and needs consultation with stakeholders. Currently this is not developed in enough detail to enable us to comment comprehensively and will be vital to the success of any transformational scheme.

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