

London TravelWatch response to the Mayor of London's Oxford Street transformation consultation

About London TravelWatch

London TravelWatch is the official independent watchdog set up to advocate for people travelling in and around London.

London TravelWatch promotes integrated transport policies and presses for better journeys for everyone, with higher standards of quality, performance and accessibility. We work directly with users, other transport user groups, transport operators, providers, regulators and local authorities. In turn, transport operators consult us on proposed changes to services or closures of lines or stations.

Given our role as transport watchdog for London, we have focussed our response on the proposal to develop plans to pedestrianise Oxford Street, particularly the issues relating to the impact on pedestrians and people using public transport. Accordingly, we do not offer a view on the proposed establishment of a new Mayoral Development Corporation (MDC) although we do raise a question below about the transport rationale for its proposed boundaries.

Summary of London TravelWatch's view

When proposals to pedestrianise Oxford Street have previously been raised, the London TravelWatch position¹ has been one of no in-principle objection in recognition that pedestrianisation would, in many respects, offer a great environmental improvement for people, and improve the public realm more generally, alongside potential economic benefits. This is our starting point for this consultation, but there are many practical issues to address and details yet to be provided before we can be confident in what is being proposed.

The potential benefits of the proposal to pedestrianise Oxford Street

Walking is both an important mode of travel in itself and something which is an integral part of any public transport journey.

However, for Oxford Street's pedestrianisation to work for people providing the right infrastructure has to be done well. Improving public spaces by providing high quality street infrastructure and associated infrastructure such as seating will encourage more walking and wheeling, and create a better environment for those already doing so. However, such a pedestrianised street space needs to be accessible, such as having good quality level paving, tactile paving and dropped kerbs where needed.

¹ This includes London TravelWatch's response to the 2009 GLA consultation on Traffic Congestion on Oxford Street, Regent Street and Bond Street; and in a 2017 paper to the London TravelWatch Board about TfL's Oxford Street bus changes associated with pedestrianisation.

More widely, access needs to be provided to free to use toilets on Oxford Street. And any detailed proposals will also need to focus on how to ensure personal security for people in the Oxford Street area.

More detail is also required about how the scheme might deliver much needed safety improvements. For example, the headline statistics in the Equality Impact Assessment (EqIA) don't provide any detail on the location of collisions or vehicle type. The statistics also don't indicate whether there might be any disbenefit in, for example, diverting cyclists from Oxford Street to potentially less safe alternative routes. The EqIA states that any changes to cycling access on Oxford Street would mean that alternative routes for those cycling may also need to be considered, and we believe that these routes must be safe and appropriate.

The potential risks of the proposal to pedestrianise Oxford Street

London TravelWatch believes that it is important to note that any proposals to pedestrianise Oxford Street must focus not only on making Oxford Street itself accessible but on ensuring that getting to and from Oxford Street will be accessible for as many people as possible.

Whilst the arrival in recent years of the Elizabeth line at Bond Street and Tottenham Court Road are welcome additions to the accessible travel options in the area, other Tube stations on Oxford Street are less accessible, with some people unable to use them at all because of the barriers in place. By contrast, the bus is the most used form of public transport in London and, crucially, the only mode that is both more accessible and affordable. The bus is considerably cheaper to use than the Elizabeth line and the Tube, especially for passengers who can benefit from the Hopper fare or daily cap.

The consultation explains that there has been a significant reduction in the number of buses running along Oxford Street in recent years, with 35 per hour today in each direction. However, even diverting a smaller volume of bus traffic is still a challenge given traffic levels on alternative roads, which may already be served by other bus services. This may result in knock-on impacts on bus services in the wider area.

We have noted that, whilst detailed proposals for the pedestrianisation will be subject to further engagement and consultation, this consultation has already acknowledged that pedestrianisation would impact bus passengers and users of taxis and private hire vehicles and, likely, cyclists.

The Equality Impact Assessment for this consultation acknowledges that any proposed relocation of buses would have an impact upon bus passengers and detailed proposals would need to set out the degree of that impact and any mitigations.

Should the plans for pedestrianisation proceed, London TravelWatch will very carefully examine the detailed proposals to inform our formal response. This will include reviewing the proposed re-routeing of buses in the local area, both in terms

of the location of the alternative roads and in how easy and safe it will be for passengers to access Oxford Street.

London TravelWatch will also expect the detailed proposals to clearly explain what exceptions are proposed to ensure that other groups will still be able to access Oxford Street. For instance, will the proposals allow continued access for disabled people either as Blue Badge holders or when using a taxi or private hire vehicle?

The boundaries of the new Mayoral Development Corporation (MDC)

As noted above, we do not offer a view on whether an MDC should be established. However, if it does go ahead, we note that its proposed boundaries do not include:

- Wigmore Street (except for a short section between its junctions with James Street and Marylebone Lane)
- Cavendish Square (except for its south side)
- Cavendish Place

We would question these omissions as we would expect this to be one of the most impacted routes if Oxford Street is pedestrianised and therefore most deserving to be part of a joined-up area-wide approach. For example, we note that in 2017 TfL proposed to divert two bus routes along those roads in the consultation for the Oxford Street bus changes associated with those pedestrianisation plans, and so TfL may propose something similar if these pedestrianisation plans proceed.

The importance of co-design in planning a pedestrianised Oxford Street

Should the pedestrianisation scheme proceed, London TravelWatch strongly urges a focus on inclusion and accessibility throughout the consultation planning and delivery stages. To enable this, it is crucial that TfL and, should it be implemented, the MDC fully engage with a wide variety of users in the development of the detailed proposals.

This must include genuine and wide-ranging co-design throughout, starting at the earliest possible stage of the design process. It must include individuals and representative groups with lived experience and groups who may be harder to reach. Undertaking this engagement and applying this learning should result in outcomes which maximise positive impacts and minimise negative impacts.

Ensuring that the consultation is widely accessible

When the consultation with the detailed pedestrianisation proposals is launched, it must be made widely accessible so that as many people as possible can view it and submit their responses. And so, the consultation website should include a variety of alternative formats including Easy Read, Audio and British Sign Language services. To ensure access to the proposals for those who are digitally excluded, there must be the opportunity to see details of the proposals in person. This could include using on-street advertising such as the posters wrapped around bus stops which TfL use to advertise their bus consultations, along with drop-in sessions at an appropriate

location on Oxford Street and in-person meetings to view the proposals and discuss them with TfL representatives.

And to ensure that as many people as possible can respond to the consultation, the opportunity to submit views by phone or in writing free of charge must be included alongside the options of replying by email or taking a survey on the consultation website.

Evaluating and reviewing detailed plans

Finally, at the stage that more detailed plans have been developed, London TravelWatch also calls on TfL and the MDC to ensure that they will rigorously evaluate and review how they meet the different criteria and assess if they achieve what the public want.