

London TravelWatch response to Transport for London's proposals for transport and highway changes on Oxford Street

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.

1. Introduction and focus of London TravelWatch's submission

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.

And so, in our submission to the Mayor of London's Oxford Street transformation consultation last year, we stated that we had no in-principle objection to pedestrianisation. However, we emphasised that before we could be confident in what is being proposed there were many practical issues to address and details yet to be provided, such as how access to Oxford Street would be maintained.

This consultation response will provide London Travelwatch's view primarily based upon the information contained in this second consultation. However, we have also reflected on the findings of the outcome report from last year's consultation, including both the majority public support for pedestrianisation and the opposition to pedestrianisation and concerns including from some local residents²

TfL have assessed the impacts of the proposed Oxford Street project across four specific aspects:

- Intervention 1: Pedestrianisation of the street (including the restriction of taxi and private hire vehicles and changes to cycling access)
- Intervention 2: Servicing arrangements
- Intervention 3: Relocation of bus stops
- Intervention 4: Bus service changes

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.

² [Oxford Street Transformation | Have Your Say](#). TfL, 2025

Given London TravelWatch's role as transport watchdog for London, we have focussed our response on Interventions 1, 3 and 4, and will comment on how the proposed transport and highways changes will impact on pedestrians including those who use public transport to travel to, from and through the area.

2. Summary of London TravelWatch's view

- London TravelWatch strongly supports pedestrianising Oxford Street West as a way to reduce conflict between vehicles and pedestrians, improve safety, reduce overcrowding and enhance the overall experience for pedestrians.
- In wider terms, we hope that a pedestrianised Oxford Street West will also help to regenerate the wider area, provide a greater experience for both Londoners and visitors and enhance other travel developments such as the Elizabeth line.
- However, it is important that pedestrianisation focus not only on making Oxford Street West itself accessible but on ensuring that getting to and from Oxford Street West will be accessible for as many people as possible.
- There is some lack of detail in the proposals about how Oxford Street West will look and feel for pedestrians in future. We hope that this will be a particular priority of the new Oxford Street Development Corporation (OSDC).
- We are concerned that the evaluation and assessment of the impact of the proposals in the Equality Impact Assessment (EqIA) is not as in-depth or as comprehensive as previously, and so it does not give the truest impact of the changes (whether positive or negative).
- There are gaps in the supporting information and data provided by TfL. This includes:
 - A lack of clarity about future confirmed provision for taxi users and blue badge holders
 - A lack of information about the potential safety implications of diverted cycling flows
 - No details of the number of bus passengers who would need to change bus in future to complete their journeys
 - No breakdown of the percentage of affected bus passengers by protected characteristic and inclusion group
 - No Night Test assessment of the impact on the safety of women needing to change between buses during the hours of darkness.

Consequently, it has made it more difficult for London TravelWatch to undertake a fully rounded assessment and to reach definitive conclusions about these proposals.

3. The proposed changes

As London TravelWatch understands it, TfL propose that:

- Oxford Street West will be closed to private motor vehicles, buses, taxis and private hire vehicles, cycles, scooters and pedicabs.
- Traffic will be allowed to cross Oxford Street West at four junctions in the pedestrianised section. These pedestrian crossings would be controlled by traffic lights and be much wider than currently.

- The existing taxi rank outside Selfridges on Oxford Street West will need to be removed but there would potentially be additional ranking space elsewhere on the roads surrounding Oxford Street West.
- Cycling would not be allowed on Oxford Street West (including e-bikes and e-scooters) but TfL will work closely with Westminster City Council (WCC) to support proposals to provide high-quality alternative cycling routes through the area.
- There will be changes to the routing of bus services which currently run along Oxford Street West. In addition, some services from the west would in future be withdrawn east of Marble Arch.
- There will be changes to the routing of some bus services which do not operate on Oxford Street West but operate close by.

To inform this response, London TravelWatch has carefully examined and assessed the online consultation material provided by TfL. A site visit was made to the Oxford Street West area to see how the proposals will affect people in the location of alternative routes, including for bus passengers, and how safe and easy it will be for people to access Oxford Street by foot, bus, taxi and cycle. We also spoke with some members of the public on Oxford Street to hear their thoughts on the planned pedestrianisation.

4. Intervention 1: Pedestrianisation of Oxford Street West

Walking is an important mode of travel in itself. On an average day in 2024/25, walking was 'the most frequently used mode of travel in London, with 38 per cent (6.2 million) of all trips by London residents.'³ Walking is also integral to travelling around London and a key part of any public transport journey, such as from a person's home to the bus stop, between the bus and the train station, and from the station to their destination. Having walkable streets is a core part of the transport network.

We recognise too that streets are more than just about movement of people and vehicles and that they are places and destinations in their own right.

In the context of this consultation, we believe that it is important to reflect on the recent road safety record in the Oxford Street area. Namely that from May 2022 until April 2025 there were 79 collisions along Oxford Street West and its junctions, which resulted in 24 serious injuries. 54 of those who were injured were pedestrians.⁴

TfL believe that the pedestrianisation scheme will reduce conflict between vehicles and pedestrians and improve the area for all pedestrians by providing more space for walking and by improving crossing facilities. This will make it easier to move safely along Oxford Street West, reduce overcrowding and enhance the overall experience for pedestrians. This is something which London TravelWatch strongly supports.

³ [Travel in London 2025 - Annual overview](#), TfL, 2025

⁴ [Oxford Street - proposals for transport and highway changes](#), TfL 2025

It is positive too that there will be reduced noise pollution in some areas, but we would welcome mitigations to reduce the impact of any noise pollution increases elsewhere.

The importance of stakeholder engagement and co-design

However, for Oxford Street West's pedestrianisation to work for people, it must be accompanied by high quality street infrastructure and associated infrastructure.

As part of this, we repeat our earlier call for a focus on inclusion and accessibility throughout the planning and delivery stages. This includes genuine and wide-ranging co-design throughout, which includes individuals and representative groups with lived experience and groups who may be harder to reach. We welcomed the opportunity to contribute at the TfL led workshop in September 2025, in which a range of accessibility groups with lived experience gave feedback about the existing conditions on Oxford Street, as well as the impacts and recommendations for a proposed scheme on Oxford Street West.

And so, going forward, we ask how the OSDC will take mainstream consideration of disabled people into its work and governance.

We hope that the OSDC will also be accountable to local residents and ensure that their views and concerns are taken on board as far as possible. This includes the importance of having user representation on the new Planning Committee, which will in due course sit under the OSDC.

Finally, we hope that the OSDC will bring to London the learning and experience from other cities, such as Vienna, Dublin and Milan, who have pedestrianised areas.

The environment on Oxford Street West and the surrounding streets

London TravelWatch recently undertook research to understand more about what people need from their streets and how improvements should be prioritised.⁵

One of the biggest causes of dissatisfaction in our research was poor pavement conditions, with 30% of respondents saying they were dissatisfied with pavement quality in London. And so, to encourage and enable as many people as possible to benefit from a pedestrianised Oxford Street West, this space must be accessible, by having good quality level paving, tactile paving at crossings and dropped kerbs, where needed.

In addition, 42% of people in our research said that they have experienced issues when walking or wheeling including overcrowded pavements and obstacles such as signage and e-bikes or scooters. Taking steps to reduce this crowding will therefore make for a safer and more pleasant environment. This will particularly benefit those who may feel most impacted such as those carrying items, with physical or mental conditions, and parents with their children.

⁵ [Making space - improving London's streets for walkers and wheelers](#), London TravelWatch, 2025

Having enough places to sit and rest was the most important factor in contributing to making London's streets work well, with 33% of respondents choosing them. Seating and rest areas, along with shelter from the elements, should therefore be provided on Oxford Street West, as they will encourage more walking. We are therefore pleased that TfL have said that new seating and rest areas would form part of the planned urban realm improvements.

A pedestrianised Oxford Street West should provide free to use public toilets and Changing Places. Access to such facilities can be particularly important for older people and disabled people, though they benefit all Londoners. Public toilet accessibility drew the most dissatisfaction in our surveying, with 49% of all respondents dissatisfied with them. This was higher for those aged over 65 (63%) and disabled people (58%).

41% of people in our research said they feel unsafe walking or wheeling after dark – particularly women and those with physical or mental health conditions. To give people confidence that they will be secure in the Oxford Street West area, it must be designed with good lighting, CCTV and natural surveillance. The EqIA refers to mitigations such as working with WCC 'to ensure lighting and surveillance (CCTV and/or natural) is present.' London TravelWatch believes that it is critical that TfL and WCC do all that is possible to create a safe environment.

To help with the general environment for pedestrians, we support the proposal that cycling would not be allowed on Oxford Street West, though, as discussed later, it is important that high-quality alternative cycling routes through the area are provided.

We also believe that improvements to Oxford Street West must be accompanied by improvements to the surrounding roads, to ensure that getting to and from Oxford Street West will be as accessible and safe for as many people as possible.

TfL have said that they would work with WCC to improve the condition of footways in the surrounding area. For the reasons we have mentioned above, we call for pavements to be widened, wherever possible, and for tactile paving to be installed at any locations where it is currently absent. There should also be improved signing for pedestrians, especially to and from the new bus stops on the parallel streets. And the improvements to lighting and surveillance mentioned above should also be present on the surrounding streets.

Access to Oxford Street West by taxi, private hire vehicle and for Blue Badge Holders

TfL acknowledge that older people, disabled people and women (including pregnant women) have higher rates of taxi usage and so would be impacted as the proposals restrict taxi access to Oxford Street West. Therefore, the changes set out may have a greater impact on those groups.

Looking at the proposals, the taxi rank on Oxford Street outside Selfridges will need to be removed because of the pedestrianisation. However, we welcome the 'potential new locations' for three new taxi ranks, two of which are particularly close to Oxford

Street West, along with an extension to the existing taxi rank at Duke Street. We hope that all these new locations will be implemented in good time for when Oxford Street West is pedestrianised, so that users will be able to access taxis as conveniently and as close as possible along the length of Oxford Street West. However, should not all the proposed taxi ranks be implemented, we ask what mitigations will be put in place for taxi passengers.

We are pleased that TfL will maintain the number of blue badge parking bays in the area. However, it isn't stated if all these bays will remain in the same location and we could find no reference to them on the consultation maps. Should the bays not remain in the same location, we hope that they will be spaced out as evenly as possible from east to west on either side of Oxford Street West, to make it as convenient as possible for their users. Given the absence of information about the bays, though, we need to ask if future access to them will be unchanged, harder or easier.

Access for cyclists

Given the decision since the last consultation to not allow cycling on Oxford Street West, we have reflected on our previous response, when we said that more detail is required about how this scheme might deliver much needed safety improvements. For instance, we had noted that the collision statistics did not indicate whether there might be any disbenefit in diverting cyclists from Oxford Street to potentially less safe alternative routes, as these alternative routes had to be safe and appropriate.

And yet in this consultation we could not find any information, such a risk assessment for the alternative routes. All that TfL say in their EqIA (which, in general, is rather thin given the number of impacts of this proposal) is that the pedestrianisation 'would be likely to move cyclists...elsewhere, which could reduce women's perception of road safety while cycling in the area,' and, in relation to children and older people, 'While quieter streets may offer a safer environment in some cases, the detours could increase journey times and introduce unfamiliar or less direct paths. This may discourage cycling.'

Whilst TfL have said that they will work closely with WCC to support the development of high-quality alternative cycling routes through the area, this means that no detailed proposals can be commented upon in this consultation. We are surprised that these plans have not yet been developed to a sufficient level to include here and ask how TfL and WCC will help to ensure the safety of cyclists in future including immediately after Oxford Street West is pedestrianised. As the situation currently stands, the absence of critical information for cycling does not allow respondents to evaluate the proposals in the round, so it is only possible for London TravelWatch to continue to support the principle of safe alternative cycle routes.

In the meantime, one positive way to encourage cyclists to visit Oxford Street West is to ensure that there are plenty of well-located parking bays for cycles and e-bikes on the fringes of Oxford Street West. The consultation maps do not appear to show the current bays, but we would hope that there are plans to maintain - if not increase - the current number as part of these proposals.

5. Intervention 3: Relocation of bus stops

Introduction

The EqlA for the previous consultation acknowledged that any proposed relocation of buses would have an impact upon bus passengers. It said that detailed proposals would need to set out the degree of that impact and any mitigations.

London TravelWatch has now carefully examined the proposals in this consultation to inform our response. This has meant reviewing the impact on passengers due to the proposed relocation of bus stops in the Oxford Street area. We have considered both the location of the alternative roads and how easy and safe it will be for passengers to access Oxford Street West in future.

Whilst we will talk in detail about the proposed bus service changes in the next section, it should be noted here that the relocation of bus stops will most affect passengers on day route 98, 24-hour routes 139 and 390, and night bus routes N98 and N207.

The importance of the bus in the Oxford Street area

Whilst TfL have rightly emphasised the introduction in recent years of step-free access at Bond Street and Tottenham Court Road stations, it should not be forgotten that the other two stations serving Oxford Street, Oxford Circus and Marble Arch, lack step-free access to entrances and exits. This makes them impossible to use for some people and therefore makes the availability of bus services in the Oxford Street area important.

The bus remains by far the most used form of public transport in London and, crucially, it is the only mode that is both more accessible and more affordable. The bus is also considerably cheaper to use than the Elizabeth line and the Tube, especially for passengers who can benefit from the Hopper fare or daily bus cap.

As with taxi usage, older people, disabled people and women (including pregnant women) have higher rates of bus usage, and so they would be more impacted as the proposals restrict access to Oxford Street West.

The impacts of relocating bus stops

TfL have proposed the diversion of buses away from the two pairs of existing bus stops on Oxford Street West adjacent to Selfridges and John Lewis. Instead, people wishing to access Oxford Street West by bus would need to walk or wheel an additional 100m to 200m to/from new bus stops in each direction on Wigmore Street and Henrietta Place for through bus services and westbound on Margaret Street for terminating services.

Although there appears to be no other obvious alternative locations for bus stops with a pedestrianised Oxford Street West, the relocation of these bus stops will presumably have a significant impact for many people (though there do not appear to be detailed numbers about this in the consultation materials). Even with shorter

distances, what may be a reasonable – if inconvenient – journey to/from bus stops and Oxford Street West for non-disabled passengers may be an insurmountable distance for a visually impaired person or wheelchair user and may be a barrier to them travelling at all.

To help reduce barriers to the additional travel and to mitigate the impact of the changes, there needs to be good infrastructure such as high-quality pavements and the provision of dropped kerbs.

In terms of travel to/from Oxford Street and the new bus stops, the EqIA notes the mitigation of ‘Clear communication of any bus stop relocations in advance of implementation.’ We would go further, though, and call for clear communication to be a built-in feature in the local area, with clear signage on the streets, such as location maps in the bus shelters of the new bus stops and Legible London signage.

Other passengers will also be impacted by the proposals. For example, those with learning difficulties take time to learn a bus route and can need a lot of support, so altering bus services can be a real barrier. If these proposals go ahead, TfL should consider expanding their travel mentoring scheme to assist passengers in the period after changes are made to bus routes.

Because of relocating these bus stops, some people may no longer attempt to make the journey. Others may switch to using a taxi or private hire vehicle, which would allow them to begin and end their journey closer to Oxford Street West but will contribute to an increase of congestion in the wider area.

Bus stop facilities

As a mitigation for the relocation of bus stops, the EqIA says that ‘real-time information’ should be provided, which we support. But we go further and call for **all** the new bus stops on Wigmore Street and Henrietta Place to also have a shelter with a seating and lighting.

This is important for various reasons, including:

- These will presumably be very busy bus stops, given that they will be used by passengers displaced from the former bus stops on Oxford Street West.
- Passengers can be concerned for their personal safety whilst waiting at bus stops especially in busy locations, which may have an impact on crime, such as phone snatching or pickpocketing. There can also be particular concern for personal safety at night, when perpetrators of crime have the benefit of dark streets and fewer bystanders. So, whilst the absence of Countdown would be a disadvantage to those without access to digital devices at any time, its absence at night would mean that even people with digital devices may not want to use them in these locations. Clear lighting in bus shelters will also help to act as a deterrent.
- Providing seating will contribute to a more accessible and inclusive bus service for people who require places to sit and rest, such as those with certain mobility impairments.

We were therefore concerned on our site visit to see the narrow pavement on Henrietta Place where the proposed eastbound bus stop will be placed. Meanwhile, building work on the other side of the road means it is currently unclear how much space there will be for passengers for the westbound bus stop. We ask if this will mean that it will not be possible to have bus shelters at either or both stops. Even without bus shelters here, we wonder whether there will be crowding, which will make it difficult for people to navigate the pavement, whether they are using the bus stop or just walking or wheeling past it. We therefore ask TfL to monitor this potential crowding and to make improvements and/or mitigations if this proves to be an issue.

Traffic on the diversionary roads

We note that there are no proposals for bus priority on Wigmore Street and Henrietta Place, so buses will be forced into the flow of all general traffic on those roads. This contrasts with the current situation on Oxford Street West, where motor vehicle access is not permitted from 07:00 to 19:00 from Monday to Saturday.

We walked the proposed alternative route for buses and saw, even on a weekday early afternoon, the heavy volume of traffic on Wigmore Street around the location of the proposed new bus stops there. And this is of course before the changes have taken place. Even the EqIA acknowledges that 'pedestrianisation could lead to issues such as increased congestion on surrounding roads due to displaced traffic.'

As we will discuss below, the two main east-west bus routes (the 98 and 390) will use Wigmore Street, and they are predicted to be the most adversely affected routes under these proposals. Seeing the traffic congestion outside of peak times makes us wonder if the negative impact for passengers on those routes could be even worse than predicted. We therefore call for TfL, in conjunction with WCC, to give buses the priority on the road that it needs in this and any other location in the wider Oxford Street area, wherever possible.

6. Intervention 4: Bus service changes

Along with reviewing the proposed relocation of bus stops, we have looked at the proposed curtailment of bus routes and the impact on passengers of any changes to their first and/or last bus stops.

Traffic impacts

This consultation includes details of the expected traffic impacts of the pedestrianisation of Oxford Street West. Most of the affected bus routes fall in the range of either expected slightly better journey times or slightly worse journey times of one to two minutes.

Routes 98 and 390

Not surprisingly, the bus passengers who would be most affected are those using routes 98 and 390, which would continue to run between Marble Arch and Tottenham Court Road, albeit now diverted away from Oxford Street West onto the parallel roads described in the previous section. As a result, journey times will

increase for both routes by up to five minutes in peak times, especially for buses heading east. To add context, the latest TfL bus network performance data shows that the average speed for routes 98 and 390 is barely seven miles per hour.⁶

A hazy statistic in the EqIA states that ‘between 30% and 41% of passengers on Routes 98, and 390 are making through trips. Passengers wishing to make ‘through trips’ are likely to experience a higher impact as a result of a change in their route.’ That equates to a significant number of passengers, but TfL have not provided data showing the actual number of passengers.

Routes 7 and 94

These two routes will in future be curtailed at Marble Arch rather than continue to/from Oxford Circus, and further on to Piccadilly Circus in the case of route 94.

Route 7 will start and finish at stops on the Edgware Road by its junction with Oxford Street, which will at least provide same stop interchange with route 98 for passengers wishing to travel to/from the roads parallel to Oxford Street West.

The precise stopping arrangements for route 94 at Marble Arch are a little unclear in the plans but it appears that passengers will be able to change buses for onward journey either at the same stop or at one a short distance along Oxford Street.

One regrettable impact, though, for route 94’s passengers wishing to travel to/from Marble Arch, Regent Street and Piccadilly Circus is how difficult that journey would be in future. To complete their journey heading east, one option would be to change at Marble Arch but this is in an awkward interchange to/from route 23 (by either crossing from Bayswater Road to Edgware Road or crossing from Oxford Street to Park Lane). Alternatively, passengers could change from route 94 at Marble Arch for route 98 or 390 and then change again, to route 139 at the same stop on Wigmore Street.

Routes terminating around Oxford Circus (routes 12, 22, 55, 73 and 159)

Despite the scale of the proposed changes in the Oxford Circus area, a specific map showing all routes in this area was not provided. Neither was this information provided in the geographic map included for Oxford Circus. Instead, it only shows some of the bus routes in the area (and the same applies to the map covering the Marble Arch area).

The written information provided about buses around Oxford Circus is also patchy, such as what route 22’s first stop will be, whilst the interchange between routes 73 and 390 is somewhat unclear. In general, it would also have been helpful if TfL had been clearer about routes where no changes were proposed, such as the 12 and 55.

Whilst compiling this response, we asked for clarification about these and other points through our contacts at TfL. We were appreciative of their responses, which

⁶ [Route-all-bus-speeds-to-p09-2025.xlsx](#), Route - (All day types & all hours) to P09 2025/26, TfL, 2025

answered those questions. However, we acknowledge that that places us in a privileged position and means that the information was still not available for other people to consider.

Assessing the impact of the need to change bus

Usually in their consultations covering bus services, TfL provide data to explain how many, and the percentage of, passengers who would need to change bus in future to complete their journeys. But TfL have not provided the number of these broken links this time around, which contrasts with the 2017 Oxford Street consultation, when TfL **did** provide this information.

Without this data, it is impossible for London TravelWatch to fully judge the scale of the impact of these proposals for day and night bus passengers. It may also bring into question how confident TfL are with these plans and how seriously they are open to any challenges about them.

What London TravelWatch **does** know is that passengers don't like changing buses. Time spent doing this is involuntary because having to change will always be second best to using a direct service, so the more convenient the change the better. It adds additional time to a journey and an uncertainty of timing of the journey.

Changing buses can potentially mean an additional cost for passengers if they go outside of the 60-minute Hopper fare window while waiting for their second bus, particularly at night when buses are less frequent. Given that some of the bus routes in this consultation are amongst the slowest in London, some passenger's journeys may in future fall outside of the Hopper Fare window and they will have no choice to pay for their next journey, through no fault of their own.

We also know that interchange can also be inconvenient and stressful, especially for some passengers such as older and Disabled passengers or those with children or luggage, who choose the bus because it is easier for them to use. Again, unlike in most other bus consultations, TfL have not provided a breakdown of the percentage of passengers for the affected routes by protected characteristic and inclusion group, where data is available at any meaningful level. We ask why TfL have not provided this crucial information and whether its absence means that TfL have not considered this relevant data before putting forward these proposals.

It is also important to note that because those on lower incomes are more reliant on bus services, having to change buses would make their bus journeys more onerous and potentially exacerbate their time poverty.⁷

The bigger bus picture

In terms of buses, London TravelWatch is conscious that one of the main issues facing buses in the Oxford Street area – consistently low average speeds – is not confined to this area alone. We know that this is less than ideal for passengers; our research found that faster journey times are one of the top factors people say would

⁷ [Who uses the bus...and why?](#), London TravelWatch, 2022

encourage them to use buses more.⁸ And so, rather than just manage the issues around the withdrawal or re-routing of some bus services in the Oxford Street area, we hope that TfL see the proposed changes as a chance to improve the wider bus passenger experience, with a particular focus on increasing low average bus speeds.

7. Night bus services and the night-time environment

Increasing the number of journeys which will require a change of bus is not just an inconvenience and a cause of longer journey times. It is also a critical safety issue.

Under these proposals, many people will need to change bus in future to complete their journey. As we have mentioned above, this may be unwelcome or even impossible for some people during the day. However, London TravelWatch knows that there is a particular concern about safety whilst waiting at bus stops at night. This was confirmed in our [research about personal security when travelling on London's transport network](#) in which 73% of people felt that night-time (10pm to early morning) is the least safe time to travel. It is at night that perpetrators of crime have the benefit of dark streets and fewer bystanders.

Given this, we are concerned that it is proposed that four night bus routes which currently serve Oxford Street West from the north, south and west will be curtailed at Marble Arch instead. This will affect not just passengers who currently use those buses on Oxford Street West but also on those two routes which currently extend past Oxford Circus, namely 24-hour route 94 to/from Piccadilly Circus and the N113 to/from Trafalgar Square.

For many TfL consultations proposing changes to bus services, the EqIA includes a Night Test assessment of the impact on safety of women during hours of darkness (18:00-06:00). This assessment usually reports approximately how many trips on affected bus routes would require a change of bus in future. As can be seen from the timeframe of the assessment, it also covers the evening period when it is dark all year round, and in the early morning and early evening periods when it is dark during the winter months. For an area as vibrant as busy as Oxford Street West, such an assessment would presumably provide a considerable amount of data.

However, as with the other data aspects that we would have expected TfL to provide for this consultation, but which they haven't, no details of a Night Test have been provided. We ask if TfL has undertaken one.

8. Evaluating and reviewing detailed plans

In our response to the first Oxford Street consultation, we called on TfL and the Mayoral Development Corporation to ensure that, when more detailed plans have been developed, they will rigorously evaluate and review how they meet the different criteria and assess if they achieve what the public want.

⁸ [The Next Stop: Making London's buses better](#), London TravelWatch, 2024

While we have noted above that TfL have undertaken some evaluation and assessment of the impact of the proposals in the EqIA, we are concerned that this is not as in-depth or as comprehensive as previous work. And so, this does not give the truest impact of the changes (whether they be positive or negative).

9. Advertising the consultation

Online advertising

We welcome steps taken by TfL to make the consultation more accessible to the public. This includes providing alternative formats including easy read, audio and British Sign Language (BSL) versions of the proposals and survey, and a BSL conversation service. We also welcome that there was the opportunity to submit views in writing free of charge or by phone.

Question tool

In their online consultation pages, TfL usually provide their helpful question tool, which allows anyone to submit a written question, to which an answer is then provided which all readers can view.

The More Information section of this consultation mentions using the question tool to submit a question to TfL. However, there does not appear to be a link in the consultation pages to the questions asked and the responses provided by TfL. This would have helped this respondent (and perhaps others too) to obtain answers to some of the questions prompted by the missing information and for questions which we may not have considered.

Presuming that some questions had been asked, we would welcome clarification from TfL about where the answers were published or, if they weren't published, the reason why that decision was made for this consultation.

On-street advertising

When viewing a selection of bus stops in Oxford Street West, we were disappointed to see so little publicity of this consultation. In many other recent bus consultations - including the current one for single route 424 - TfL have placed wrap around 'Toblerone' posters at affected bus stops, which provide digital and non-digital ways to find out more information and respond to the consultation. We ask why TfL decided not to use this eye-catchingly effective way of advertising its plans for this consultation. Ironically, we did see one example of a Toblerone wrapped around a lamppost at Oxford Circus, but this was advertising TfL's long closed consultation on pedicabs regulation.

The only advertising that we could see were A5 sized posters in the timetable cases at some bus stops. Whilst this is better than nothing, regular bus passengers - who will be most affected by these proposals - would be less to look at the timetable case than, for instance, tourists.

When in the Oxford Street area, we did not see any other advertisements for this consultation, which we believe is a missed opportunity given the scale of the proposals. We feel that TfL could have been more creative in advertising this consultation. For instance, could they have made use of the unused bus shelters at the eastern end of Oxford Street West? At least that way, the thousands of people who pass by every day would have had the opportunity to find out more about the consultation and perhaps some may have decided to submit a response.

Drop-in events

We had previously called for people to be given the opportunity to see details of the proposals in person, to ensure there was access for those who are digitally excluded. Whilst we welcome that drop-in events were arranged, it is disappointing that TfL chose the Regent Hall venue, which is not fully accessible, as one of the two venues for the events. Worse still, the timing of the events meant that if you required the fully accessible venue, you would have had to join one of the two events at Wigmore Hall on a Friday; the two events on Saturday weren't fully accessible.