

PROPOSALS FOR TRANSFORMATION WITHOUT PEDESTRIANISATION

We maintain that the existing transformation proposals aim at maximising turnover on one street and represent a missed opportunity to improve the wider West End. There are alternatives that could look at major improvements whilst keeping Oxford Street open to vehicles. Indeed, we would argue that improvements to the whole area are only possible by keeping Oxford Street open.

We however remain positive that much could be achieved that would be to the reciprocal benefit of Oxford Street and the surrounding areas and we would be happy to help work towards developing a more unified scheme. The following steps below could be used as a starting point in looking at a transformation of Oxford Street and the area, that could avoid diverting traffic into surrounding areas, subordinating them to Oxford Street and removing accessibility.

1. SEVEN POSITIVE ADVANTAGES TO KEEPING OXFORD STREET OPEN

1. Greater public safety - In allowing emergency services easier access to Oxford Street. The surrounding congestion caused by its closure will greatly impede this, as will all the proposed clutter to be sited where the traffic presently runs. There will also be less opportunity for terrorist attacks on a street with vehicles; as we have seen, pedestrian only streets attract this threat. But will not the new Elizabeth line introduce vast extra numbers of people compromising safety? We say this will not happen, see below 3.7.

2. Better control and enforcement - Such as busking and street performers. WCC already find this very difficult to control - how much more so with a Trafalgar Square-type environment attracting huge numbers of street entertainers and the criminal element that goes with them.

3. Less crime - Night-time safety due to traffic flow - crime enforcement is much easier on a street with traffic, there would be fewer opportunities for crime, with less shelter spots, and more likelihood of being seen.

4. Trading safeguarded - Traffic is the lifeblood for shops in a long street such as Oxford Street. It is essential to have transport to get to, from and along, for the old, the disabled, for those with heavy shopping, it is needed for deliveries, and very convenient for everyone else.

If Oxford Street is closed, it is likely that many who previously travelled there to actually shop will be put off, not least by the congestion and pollution getting there, and will prefer the nearby easy access alternatives, such as Brent Cross, and the Westfield Centres at Shepherds Bush and Stratford.

Oxford Street, far from seeing increases, could actually lose revenue. How many bus users will just give up and go elsewhere once there are no buses along Oxford Street? Indeed it is not only the bus-using public that will be driven away, it is also the highest spending demographic who will be deterred from shopping in an area they cannot access by taxi.

Further, closure of Oxford Street will adversely affect a huge number of shops, estimated almost half (45%) the total, that have no rear or side access and will need to carry out all their delivery unloading and rubbish removal from the side streets, not to mention the disturbance and extra congestion to residents that this will cause.

5. Accessibility maintained - We propose that buses should continue to serve Oxford Street, maintaining the current convenient connections for passengers who depend on buses-including the daily night bus network.

The bus route frequencies should be cut back to reflect the continued recorded drop in usage. TfL should schedule some bus routes to terminate short of Oxford Street and Marble Arch reducing the number of buses serving Oxford Street even further.

This will maintain a well established east west link along Oxford Street-to enable it to be easily traversed and accessed, for the many groups that cannot use the tube for health/disability/impairment issues and for people who cannot afford the tube: those on minimum wages; in hospitality, cleaners, shop workers, security personal and other workers in Oxford Street. Night-time workers who serve the all-important night time economy rely on buses as there is at present a regular bus service throughout the night. The tube offers 24/7 only on a limited scale and only on two nights a week. Night-time workers would have no other way to commute if the bus network were dismantled in the terms proposed to accommodate pedestrianisation. The vast reduction from 75 buses per hour to 19 buses per hour, i.e., a drop of 75% proposed is completely disproportionate to the recorded drop of bus usage. The night bus route network cuts would leave a huge area-from Marble Arch to Tottenham Court Road-without transport coverage.

In addition consideration could be given to making Oxford Street the first “Electric Taxi Only” street to encourage the Black Cab trade to upgrade their vehicles. This

will address the air quality issues and prevent taxis just filling in the road space formally occupied by buses.

6. Less pollution to surrounding areas - Neighbouring roads and squares would be exposed to additional pollution and congestion caused by traffic displaced from, and servicing Oxford Street, or in the case of Marble Arch from being severed from it and left as nothing more than a very busy roundabout.

7. Allows time to assess impacts of major road changes already taking place- A large number of other major road schemes and projects are all starting around the same time as proposed changes to Oxford Street - some threaten further congestion and all are in great danger of being compromised by Oxford Street closure:

The Baker 2 Way scheme will suffer by compromising the 2 way proposals at the southern end, as made clear in the Baker Quarter BID Consultation Response.

The Marble Arch Partnership BID plans for Marble Arch Area will suffer by seeing a considerable amount of displaced traffic around it and into the Hyde Park and Portman Estates. This would actually worsen the current difficulties faced by pedestrians, as made clear in their consultation response.

The Tottenham Court Road project, introducing major road changes to the east end of Oxford Street will cause significant changes to traffic flow, with the removal of all vehicles other than buses to Tottenham Court Road.

Cycle Super Highway road alterations and the cycle quiet-ways as proposed already will affect traffic flows to the north of Oxford Street and put pressure on the surrounding area particularly if the Regent's Park gate closure proposal were to be implemented.

HS2 and Crossrail 2, although further away, will all have a knock-on effect on the Oxford Street Area.

It would seem sensible to let all these projects settle first as they will cumulatively bring many changes to the Oxford Street area and much additional strain on the existing road networks. Once they are all up-and-running a sound evidence-based argument can be constructed from actual reality rather than TfL traffic modelling (with its known poor predictive track record). Then we can accurately assess future options

FOUR KEY ISSUES THAT COULD BE IMPROVED WITHOUT CLOSURE

1. AIR QUALITY

A. Air monitoring on surrounding streets - poor air quality - it is not only Oxford Street that has poor air quality, all the surrounding areas regularly exceed EU guidelines for nitric oxide and nitrogen dioxide (NOx) emissions as well as particulate matter (PM). We need a baseline study now to determine better statistics on pollution hotspots around the area. We are taking steps to commence monitoring NOx emissions in the area around Oxford Street in order to find out more about this. Some monitoring is now being undertaken by TfL/WCC, but most of the projections rely on mere extrapolation from the existing computer traffic modelling, which is questionable on its own account.

B. Buses - reduce numbers, as already in process, and change to hybrid only, with a strict timetable on further moves to electric only.

C. Taxis - bring forward date for emission-compliant taxis, meanwhile TfL could regulate the number that use Oxford Street. One way could be based on emissions, with only low emission vehicles permitted after a set date.

D. Delivery vehicles - impose charges for the more polluting vehicles, assess reduction in numbers through freight consolidation, etc.

E. Vehicle idling - extend and improve the Marylebone LEN DontBeldle Campaign to the entire Oxford Street area, stricter enforcement on this by clearer notification and allowing parking wardens to impose tickets on idling vehicles.

F. Present Mayoral, GLA, WCC, initiatives - plans to extend the Ultra Low Emission Zone, T-Charge; these could be further tightened and charges increased, particularly on the larger diesel vehicles with further initiatives to consolidate freight deliveries and waste collections.

2. PEDESTRIAN COMFORT and SAFETY

A. Pavement widening - widening existing pavements at perceived pinch points in Oxford Street could help solve the problem, not simply send it elsewhere. We are conscious that safety should be a paramount consideration and confident that on

present WCC and GLA projected footfall figures, that any increase in pedestrian patterns, even taking into account any Elizabeth Line increase in numbers, can be accommodated initially by pavement widening where necessary and de-cluttering with a pragmatic ongoing approach guided by actual increases in numbers rather than relying on modelling with its very poor predictive track record. By relying on a practical assessment of the real situation as it develops further, infrastructure improvements could be introduced on pragmatic bases or consideration given to some elements of pedestrianisation, if and when, the actual numbers show this to be necessary. The work being undertaken in Wigmore Street on crossings at the present time will mean that the time needed to effect further changes to the area will be quite short if this proves to be necessary.

B. Pavement clutter - surplus signage, badly positioned street furniture, street hoardings disguised as telephone boxes, trading booths, all impede pedestrian access and need to be reviewed, changed, improved or removed entirely in some cases.

C. Pedestrian crossings - could be increased, re-balanced and made safer by giving pedestrians more time to cross junctions. Diagonal pavement crossings could also be considered at some other junctions, as at Oxford Circus.

D. Tube Access - consider introducing step-free access at Marble Arch and Oxford Circus prior to any further curtailment of public transport. Access from side roads rather than Oxford Street itself is already being undertaken at the new stations.

E. Westminster Walking Strategy December 2017 - should be implemented, particularly on Wigmore Street - Mortimer Street. This is a Westminster generated document and the future footfall projection across the whole of Westminster for residents, employees and visitors from 2017 - 2027 is about 60,000 per day. The evidence and calculations behind these are reached with the assistance of GLA future projections and are a great deal more objective than those in the ARUP document .

F. Traffic free days - to allow for full closure of Oxford Street on certain named days, to be developed in conjunction with the stores through the New West End Company, preferably to be aimed at a few very busy days such as those leading up to Christmas. Look at trial weekend closures, before taking further steps along the closure route, as the Major's manifesto stated.

G. Construction works - there is considerable room for review and rationalising road capacity and pavement capacity reduced by closures caused by construction works of all kinds. Bring in effective charging systems for utility companies for road and pavement closures with substantial fines for over-runs.

3. PUBLIC REALM

A. Build a central reservation - on Oxford Street west, like Regent Street and Oxford Street east.

B. Remove build-out at Oxford Circus - to allow bus lane southbound (current build out appears to be mainly used by illegal buskers) removing the pinch point this has introduced which causes increased congestion and pollution from queuing traffic in Upper Regent Street.

C. Lack of public toilets - with the obvious consequences for surrounding areas. New developments should make provisions for these, as contemplated in the Mayor's New London Plan.

D. Improved public spaces - opportunities for greening and quiet areas, again as contemplated in the New London Plan, improvement of existing areas; e.g., return Hanover Square to a functioning Square and protect existing trees. Improve access to Cavendish Square, concentrate on traffic reduction around it to try and create a true urban oasis area. Reorganise Marble Arch to create an impressive asset to the area, improve access to it, develop it as a proper gateway to Oxford Street and to Hyde Park, aim to reduce traffic round it, rather than relegate it to a polluted and noisy roundabout, the inevitable consequence of the present proposals.

E. Tree planting - along both sides of the street, or on a central reservation in order not to affect pavement width.

F. Art - look at further opportunities for public art, through genuine involvement with nominations from local residents and businesses.

G. Heritage - encourage shopkeepers to improve their shopfronts and exteriors generally, the older buildings to better reflect their heritage, discourage bland plastic signs which tend to give a cheap and nasty appearance.

4. IMPROVED REGULATIONS AND ENFORCEMENT

A. Enforcement of banned traffic - WCC have not been prosecuting banned vehicles from using Oxford Street, as a result there is a certain amount of illegal traffic using it, which could be removed but this will need investment in cameras.

B. Buskers and street traders - proper and more effective control is needed, their activities often narrow the pavements at the busiest places, e.g., in front of the station entrances and exits. This has proven difficult with the street open, with it closed we would be faced with the same situation as Trafalgar Square north and Leicester Square.

C. Pedicabs - need to be banned or strictly regulated, they are unsightly and a significant source of congestion and noise on Oxford Street and elsewhere. WCC has been lobbied by business and residents on this for over ten years.

D. Deliveries - servicing on the roads surrounding Oxford Street should be kept to a minimum and the noise and nuisance properly regulated and enforced. Rubber wheeled and plastic trollies should be mandated, to replace existing metal trollies and cages responsible for generating a considerable amount of unnecessary noise. Freight consolidation should be considered, as it has been in Regent Street, to reduce the number of vehicles servicing shops, but there should also be realism about just how effective this can be in such a disparate scenario as Oxford Street. It also has considerable downsides, such as the tendency to encourage the use of more HGV's in central London, which cause considerably more noise, vibration and disturbance than smaller lorries, particularly at night.

E. Sunday free parking - encourages people to drive in, introduces more congestion, pollution and clutter and should be reviewed urgently. If transformation were to go ahead, change would be essential otherwise, with all the extra parking on single yellow lines, many roads would become impassable by all the extra traffic.

F. Taxi touting - generates a considerable amount of unnecessary mileage and hence more pollution - in addition private hire pay no congestion charge - this should be reviewed. The Uber business model tends to flood the West End with cars seeking jobs.

G. A holistic scheme for genuine traffic reduction - consider the design of a "low traffic neighbourhood" with real restrictions on traffic going into it, not just buses.

3. “THE SEVEN MYTHS OF PEDESTRIANISATION” - THE SEVEN MAIN REASONS GIVEN FOR THE NEED FOR IMMEDIATE PEDESTRIANISATION

1. The Mayor promised to do it in his manifesto

In our view that is not a valid reason, it is for the Mayor to ensure that he only makes promises that can be realistically fulfilled. His manifesto stated “I will start by bringing back car-free-days, and possibly weekends” - but this has not happened. Having announced this as a precursor to considering pedestrianisation, he should turn his attention to fulfilling this original commitment before proceeding any further.

2. “Doing nothing is not an option”

The proposals above show that doing a lot sensibly is a very real option - without pedestrianisation.

3. Numbers are increasing, things are going to get worse

Except numbers are not increasing. The NWECC confirmed in their first consultation response that; “Footfall is in decline, particularly in the western section of the street”. Even major stores such as John Lewis are reporting a significant and continuing drop in footfall due, no doubt, to the increasing predominance of online shopping. The stores realise that this a long-term structural change in shopping habits, and ways of accommodating it, such as converting one whole floor to offices (as in Debenhams) will result in generating far less footfall than retail use. Bus user figures have been dropping significantly for the past seven years and now tube numbers, in the face of all predictions to the contrary, have started to fall. This is in many ways a very odd time to be worrying about a large increase in pedestrian numbers on Oxford Street, Crossrail aside (See 7.7). Westminster’s own walking strategy provides a reasoned forecast for the whole of Westminster. There may be a time when growth picks up, but by then an evidence based incremental approach would have had plenty of time to bed in.

4. Oxford Street is polluted and unpleasant for shoppers

This argument is even now beginning to look out-of-date given the large drop in bus numbers that has already taken place on Oxford Street. It is already a far more pleasant, less polluted place to visit. With further bus cuts and the type of emission controls as proposed above, and those proposed by the Mayor, there is now no need to close the street in order to dramatically improve the environment and certainly no need to compromise surrounding areas to do it.

5. It is important for Oxford Street to compete in a London-wide context and internationally to keep the retail and leisure offer as attractive as possible

Firstly, for the reasons given above, we see no reason why closure of Oxford Street will make it more attractive than it is at present. Indeed, we would argue that in many ways it will be less attractive: with the various safety measures it would require, HVM bollards etc; with much traffic still coming across the North-South streets; with the huge enforcement headaches closure would bring to stop it becoming another Leicester Square; with the proposal to erect tents down the centre selling hot food to help pay for it; with all that this would bring. Indeed there are many that argue that pedestrianisation will remove accessibility and reduce the street's attraction to shoppers as well as its ability to function properly as a shopping street. It is too long to fit into the standard high street pedestrianisation model, and too varied.

Secondly, even if there was to be a marginal gain, say to the large stores, from pedestrianisation, that is not a reason to impose the expense, disruption and damage to surrounding areas, just in order to give the larger stores some additional trading benefit.

6. Money needs to be spent on the ailing infrastructure in Oxford Street and pedestrianisation means that the Mayor will underwrite it

Except that it doesn't; for Oxford Street west, the Mayor's funding only extends to the initial transition phase. All he would pay for is the bare minimum to get the street closed, the traffic rerouted around it, some new lighting and the centre of the road tarmacked over and some benches. And of course the HVM work, which is only needed because the traffic will be gone.

So the £27 million or thereabouts that TfL will contribute will all go on the initial infrastructure work necessary for basic, no frills, pedestrianisation. After that the Mayor walks away leaving Westminster to find the serious money for the world-class transformation of Oxford Street: for such is the apparent end target of the scheme. This looks like a good deal for the Mayor who satisfies his manifesto promise relatively cheaply, and a bad deal for Westminster who will be left to pick up the main bill. But Westminster Council is not in a position to do this. The Second Phase of the Transformation project, is at the present time totally unfunded, and

businesses are not keen to underwrite the enormous sums involved without guarantees of payback (e.g., 'alfresco entertainments' down the middle of Oxford Street).

The money for any scheme of this nature should be found before it is started, not started in the hope that the money can then be found. However without pedestrianisation, the whole project becomes a more practical proposition. The necessary improvements would require a far more modest budget to implement the reduced, but more holistic, transformation proposals on the lines described in the sections above. There would also be a great deal more time in which to find the money, as it would not be tied in to an arbitrary timetable.

In addition to funding massive infrastructure costs Westminster would also have very substantial sums to find for all the enforcement that the scheme would require. The enforcement headaches would be many and varied and have been outlined in some detail in the main BOS Consultation Response. Proper and effective enforcement along the whole of a mile and a quarter of pedestrianised Oxford Street and the surrounding areas would be extremely expensive.

In all the consultation proposals the question of where the funding would come from has not been answered. Well, it has partially been answered because we now know where it is not coming from; and that is the TIF funding bid, because WCC failed to secure it. Prior to this, we understood that this would be a vital component of the funding of the long-term transformation proposals. We have not been told what funding source has replaced this vital component.

7. Crossrail will bring huge extra numbers into Oxford Street and create safety issues

This is the most often cited of all the reasons for pedestrianisation: the belief that the additional capacity that Elizabeth Line (formally called Crossrail) provides will lead to increased pedestrian numbers and therefore overcrowding on Oxford Street; indeed so much so, that the entire OSW time table for Pedestrianisation was based around the Elizabeth Line opening date.

That was the reason for the great rush: why pedestrianisation had to be achieved within a year from the start date of the second consultation - so that by December 2018 the Mayor could stroll down a pedestrianised Oxford Street, as he made clear he was anticipating doing at the time of the second consultation launch in November 2017. Sadly, for him, certain difficulties with the consultation have since intervened to delay fulfilment of that particular aspiration. So the assertion that, from day one of

the Elizabeth Line opening, a massive number of extra people will swamp Oxford Street, making it too dangerous or unpleasant unless the whole road were to be dedicated to pedestrian use, will now be tested with the street in its current form. We are confident, that this will not happen and if this really was a genuine worry, why did the Mayor not commence pedestrianisation proposals on Oxford Street East? Here there is exactly the same issue with the Elizabeth Line, this time at Tottenham Court Road, but the pavements are a great deal narrower than in the west. Strangely there seems to be no panic about what will happen in December 2018 at this end of the street.

On the safety aspect, the forecasted numbers is the important issue here, for if they are not correct then pedestrianisation could be simply creating a solution for a problem that does not exist.

The figures relied on and quoted for the vast increase in numbers argument inevitably come from the same source, the Consultants of choice used by the New West End Company and others, ARUP. This commercial body is not independent and has an agenda to satisfy. We dispute many of the figures given by ARUP as flawed in their assumptions and not following basic logic. They defy common sense and appear to be constructed to justify pedestrianisation and fail to display any genuine attempt to reach an objective assessment of future footfall. Their predictions are moreover in a continual state of flux, the latest figures being considerable downward revisions on the original, frankly crazy projections.

See Appendix 1

The ARUP figures cannot be relied on because they are based on a series of guesses as to user habits of a product, ie the Elizabeth Line, that is not actually in use yet. The figures that are not guesswork are usually based on extrapolating existing trends of visitors, shoppers, residents, workers and other users on a steadily upward graph when in fact at the present time and for the last few years the trends have been flat lining or dropping. They cannot be regarded as entirely objective as they are commissioned by the body for which they are producing the figures. It is in their interests to emphasise all the factors that might possibly result in higher numbers. However even ARUP are then careful to give a warning that their figures cannot be relied on because they are mere extrapolations. But once they are published, just like traffic models, the warnings of the tentative nature of their output then seems to be totally forgotten and they then proceed to be cited and quoted and given an authority far beyond their merit.

The predictions to be found in the TfL Business Plan, are probably more likely to incorporate an element of objectivity. It is interesting that here the take up for the Elizabeth Line is slow, at only, in the first year 46 million passenger journeys. In the second year, 80 million passenger journeys, full capacity not reached until 2022. See Appendix 2

Looking at Westminster's own Walking Strategy, published December 2017, it would appear that the WCC forecast of the increase in passenger numbers of 60,000 after 10 years is noticeably more sanguine than that of TfL predicting only half the rate of increase for the whole of Westminster by 2027 that ARUP manages to find by the end of next year for Oxford Street.

See Appendix 3

Then, aside from the accuracy or otherwise of the numbers given, there is the question of where all these extra passengers will actually end up; that is the use to which the Elizabeth Line will be put. Again there seems to be an assumption, and it is no more than that, that it will be used to decant large numbers of people straight onto Oxford Street, whereas it is quite likely, as its original name implies, that it will be used by people who wish to travel across London and have no wish to get out in the centre halfway along their journey. The present assumption that the Elizabeth Line will bring with it a huge increase in footfall just because more people will be able to get more easily into central London again is not well evidenced and indeed open to serious criticism. Again it is difficult to have any confidence in the ARUP figures when they are continually changing them, albeit in a downwards direction.

See Appendix 4

The Crossrail project was first conceived to relieve the congestion on the Central Line which sees Oxford Circus close regularly in the evening rush hour, and provide growth in Outer London. Therefore a certain number of people, maybe a considerable number, will be using it, who previously used the other underground networks. But those users cannot be counted as extra numbers, they are simply being displaced from one transport mode to another.

In addition, Bond Street and Tottenham Court Road stations are used by many commuters to get to and from their workplaces, most of them located in the surrounding area. The new enlarged stations feature new entry/exit points, some of which are in side streets. There is an assumption in the figures given that the entire footfall will come out into Oxford Street. But with a number of side entrances to the new stations this patently will not be the case. Has this been looked at? If not some work on what actual percentage of those coming to the Oxford Street Stations will

actually be using Oxford Street would also be useful. This would yet further reduce the predicted footfall figures

Then account needs to be taken of the vastly reduced footfall from bus passengers (presently accounting for around 30 per cent of all journeys into Oxford Street). It should go without saying that if there are no buses running along Oxford Street then there will be far fewer people coming into Oxford Street by bus. Unfortunately this does not appear to have been taken into account by ARUP. It needs to be, so the displaced figures that buses put onto the Elizabeth Line are not also counted as extra footfall.

Further, one needs then to remove from these, already rapidly diminishing footfall figures, all the no doubt large, numbers of people who would have come into Oxford Street by bus but who now won't bother to come in all, because it will be easier to get to other retail areas that continue to be accessible by bus.

Finally there will be a large group of bus users, particularly the old and disabled, who, for reasons of access, or finance cannot use the underground and will therefore also no longer be visiting Oxford Street. All these groups need to be also discounted from the total figure.

SUMMARY

Pedestrianisation brings with numerous consequences and difficulties that many agencies have struggled with for 50 years now, ever since it was first proposed. Until now the obstacles to pedestrianisation appeared insurmountable, and in fact they still are. Closure brings with it many more problems than it solves, such as public safety concerns; accessibility issues; servicing problems; congestion; disruption; traffic displacement, noise and pollution to surrounding areas. For years even TfL refused to consider pedestrianisation mainly because it would involve dismantling the existing bus network. Westminster Council until very recently was against it: in July 2016 they were still saying that pedestrianisation was... "simply not practicable and would produce too many adverse impacts on surrounding residents and businesses".

However the election of the present Mayor took pedestrianisation for the first time away from the planners where it could be relied on to safely gather cobwebs as aspirational but unachievable, and out into the political agenda. So actual viability

was replaced with political expediency, and mere overwhelming weight of evidence against this project was then no longer sufficient to deter.

So it was only in 2017 that Westminster were “persuaded” by the Mayor to join with him in adopting this as the recommended consultation option. And now, once again their conversion to the cause appears to be wavering, with Westminster’s, frankly unenforceable, “Eight Pledges” becoming “non-negotiable in the implementation of any future scheme.”

Several things have become very clear over the last two consultations, and one message has been sent home with particular clarity: residents and business do not want it. They can see what the Mayor and visitors to the area obviously cannot; that Pedestrianisation ignores the reality of traffic displacement, and relies on the theory, or hope, of traffic evaporation. That is the assumption that if a road is closed or restricted, the traffic that used it before will simply disappear, with a little help from the local area traffic signal network, rather than clog up surrounding areas. The local population have direct experience of just how wrong this assumption can be, for this is the fallacy on which the modelling for the Cycle Superhighways was based, which we have seen fail on the Embankment, on Bayswater Road, in Hyde Park and elsewhere. There is now more pollution and congestion and traffic displacement in these areas than before the schemes were implemented. Central London’s roads are more congested than ever, but with 20% less traffic than in 2000! Much of this due to removal of network capacity. So what we have seen fail elsewhere, we will surely see fail here, and we will all pay for its failure, this time, in all the neighbourhoods around Oxford Street.

The scheme as proposed is inside out. It should be the local and residential areas where traffic is reduced and the commercial streets, like Oxford Street, which are kept open for through traffic. But instead of a holistic scheme for the improvement of the overall look and feel and function of the whole of the Oxford Street area, what is on offer is a piecemeal project for the possible benefit of part of one street in the West End, to the definite detriment of the surrounding area.

It is quite possible to improve Oxford Street whilst keeping it open to a certain number of buses and taxis and cycles. In fact there are many positive advantages to be gained by keeping a modest amount of traffic on it. We have outlined these advantages above and confronted those reasons most often given for the need to pedestrianise. There is of course scope for traffic reduction in the area as a whole, but the opposite will be achieved by closing its main street. Pedestrianisation is too great a price to pay for the benefits on offer. To choke off a key part of the road

capacity of central London like this will increase congestion, reduce access, harm the many surrounding businesses in the area, and damage the health of its residents, it is entirely unwarrantable.

There are better ways to achieve a Better Oxford Street.

BETTER OXFORD STREET MARCH 2018

APPENDIX 1

“Assumptions on assumptions!”

The ARUP figures are based on the assumption of the current London Plan-dating back to the late 2000s or early 2010s. Then, the assumption was for an exponential growth rate in the number of jobs, visitors, etc., this in turn was based on uninterrupted growth from 1992 to the financial crisis of 2008.

Since Brexit, this growth is halted. Even in the 2017 forecasts ARUP go back to 2014-which are based on figures from the 2000s-but these are out of date and no longer relevant. The Treasury's latest forecasts are gloomy, and so are many other forecasts. There will be an adjustment, downwards-of employment and growth. There will be a reduction in migration to London (internal and external).

ARUP and TfL are basing their projections on outdated model assumptions — that the growth of London will continue unabated — showing growth in jobs, residents and visitors. This now has to be looked at again, because the latest evidence shows a decline in tube use- and of course the bus network usage has gone down year after year-for the last 7 years. The latest figures from TfL are for 31/3/17 and confirm that this continuing trend shows no signs of abating.

If you reduce the growth rate assumed to a more realistic figures, then all of those headline figures would be revised down sharply. Because it is exponential, the exact

base percentage used in the forecast has a very big impact. A 2% growth translates into 21.9% growth in 10 years. Use an optimistic percentage and you soon get very inflated figures.

The problems of high street spending including the technology challenge, downward property prices area (commercial and residential), and the reduction in migration will lead to a much lower growth rate than was forecasted in 2016 before Brexit.

See also Appendix 4, for ARUP'S changing predictions.

APPENDIX 2

TfL Business Plan, 2018-2023 Page 84, ELIZABETH LINE FORECASTS
Passenger journey(millions)

2017/18-46

2018/19-80

2019/20-163

2020/21-258

2021/23-263

2022/23-269

APPENDIX 3

Westminster Walking Strategy 2017-2018

Page 7 growth total in Westminster

“Therefore the estimated total growth in residents and visitors in Westminster for 2017-to 2027 is about 60,000 people a day”.

Also see figure 4 page 8 connections plan showing millions of passengers per annum using stations.

APPENDIX 4

“The Elizabeth line will bring an extra 1.5 million people to within 45 minutes of central London and carry an estimated 200 million passengers per year. When fully commissioned, central London stations will be served by 24 trains per hour in each direction; adding ten percent to London’s peak hour rail capacity”. Source: Crossrail Ltd.

Will they all get off on Oxford Street? The forecast is that an additional 69 million will according to TfL? How have they arrived at this figure?

Arup have produced a report commission by the New West End Company called "Elizabeth line readiness". Let’s examine the evidence for the increased number of pedestrians in the West End.

Let’s start with the facts before moving into forecasts. In 2016 there were 164 million annual entries and exits from Oxford Circus, Bond Street and Tottenham Court Road tube stations.

Now into the forecasts provided by TfL that Arup have used. By 2021 there will be 233 million. An increase of 69 million (a forecasted 42% increase). The Arup report helpfully provides a breakdown of splitting footfall into four key types: Local Residents 19% (31 m), Tourists 25% (41 m), Workers 27% (44 m) and Londoners 29% (47m)*. These four types of users are split between each tube station in the report. As an example in 2016 19% or 31 million annual entries and exits were made by Local Residents. Now as the number of residents in the West End is not changing when the Elizabeth line opens, you could reasonably expect little change in the number of trips made by Local Residents. Similarly, the number of workers in the area does not change dramatically when the Elizabeth Line opens. Employment changes are mostly driven by increase of office floorspace in the West End, again not the opening of the Elizabeth Line. Will tourist numbers account for the dramatic increase? Well, tourist need hotels to stay in. The number of these does not change with the Elizabeth line, but you could argue there may be a small increase. This leaves the last and largest category of Londoners: 47 m in 2016-will the Elizabeth Line add 69 million more visits by Londoners? Could this one category feasibly more than double (246% increase) to account for the growth forecasted? There still has to be a reason to visit and improving accessibility of an east west tube line is not a reason in itself to come to the West End. Even the New West End Company acknowledge in their first consultation response that footfall is declining on the West part of Oxford Street.

So why pedestrianise based on a questionable forecast? Not forgetting the 50million bus passengers that will find it harder to reach the West End if pedestrianisation goes ahead.

Jace Tyrrell, Chief Executive of New West End Company, said in the TfL press release (source: <https://tfl.gov.uk/info-for/media/press-releases/2017/november/gla--consultation-on-major-transformation-of-oxford-street>)

"In just over a year, the opening of the Elizabeth Line will bring profound change to the West End as an additional 120,000 visitors arrive every day."

BUT Newer version is different - cites 50,000 additional visitors a day by 2021.
<https://newwestend.com/wp-content/uploads/2018/03/NWEC-Elizabeth-Line-Readiness-Report-Mar18.pdf>

v2.3a

