

Oxford Street West

21 December 2017

<https://consultations.tfl.gov.uk/roads/oxford-street/?cid=oxford-street>

This consultation response is on behalf of the London Cycling Campaign (LCC), the capital's leading cycling organisation with more than 12,000 members and 30,000 supporters. We welcome the opportunity to comment on these proposals. This response was developed with input from Westminster Cyclists, LCC's local branch.

LCC supports the general intention to remove motor vehicle traffic from Oxford Street. We agree that in its present form Oxford Street suffers from high levels of air pollution and congestion - and indeed falls far short of the quality of space that should be exhibited in a globally-renowned location. The Mayor's intention to transform Oxford Street into an attractive, people-centric, destination fit for the 21st century – as part of a wider plan to clean up central London's air, reduce motor vehicle dominance and improve public realm, is laudable and long overdue: it is an intention that LCC backs. However, we have major concerns about the detail of what is proposed, and by the detail missing, relating to cycling and motor traffic both on Oxford Street and in the surrounding area.

Specific points about the scheme:

- Cycle tracks along the length of Oxford Street would be the simplest and easiest way of fulfilling the potential for far more people to cycle to, from and through the area for commuting, shopping, leisure and other trips. It is London Cycling Campaign's preferred option (we comment on alternative options, e.g. a parallel route, below) and should be properly investigated by TfL, which should publish an analysis of this option. Note that if pedestrian numbers are too high for this to work safely and comfortably for everyone, the tracks could be given restrictions, e.g. in time
- Banning all cycling on Oxford Street is undesirable. This is especially the case as many who cycle have mobility impairments and others use cycles which are difficult to mount and dismount from (e.g. children to and from family cargo bikes). Provision for those travelling to and from the front entrances to shops with such cycles should not be based on blue badge provision as has been suggested, as this will limit access to those who have applied in advance, and doesn't cover the range of people who would use this street. Encountering unsympathetic officials will also rapidly become a major barrier to use for those with legitimate reasons for wanting to park very close to shopfronts. In other words, many people who might choose to cycle to Oxford Street will not be able to "dismount and wheel their bikes through the space", and forcing those with specific needs to face further barriers to access is not acceptable.
- In the same vein, if roadway is to be retained for vehicles (even in time-limited or otherwise restricted fashion), e.g. buses, a "mobility service", deliveries, loading, taxis etc., then cycling should also be allowed, ideally 24 hours daily.

- The Mayor’s Transport Strategy aims for 70% of Londoners to live within 400m of a high-quality, safe cycle route by 2041. Both TfL’s London Cycling Design Standards (LCDS) and the Dutch CROW manual suggest lower distances between cycle routes in city centres – to 250m and below. Given this, and given the lack of appropriate cycle provision planned for Wigmore Street and potentially Oxford Street, then high-quality and safe cycle routes designed to cope with high volumes of cycling (and most likely using physically-separated cycle tracks and/or very low traffic streets) must be provided in east-west alignments to both the north and south of Oxford Street, nearby.
- The implication from the cycle map (“Changes by mode” pack) is that routing will approximately follow George Street and New Cavendish to the north, and Brook Street to the south, as the nearest viable routes that continue into Oxford Street East. The northern alignment is currently therefore set to be well over 400m from Oxford Street. Given this, it is imperative that both routes are to the highest quality. The lack of detail on the routes, or their design detail, in this consultation is a major concern when combined with Westminster Council’s recent history of opposition to meaningful and high-quality cycle infrastructure both within their borough boundaries and even beyond.
- High-quality cycling routes will require, given likely alignments, physically-separated tracks, separation in time and/or space from turning movements at junctions with significant current hook risks, and/or “modal filters” or other traffic restrictions to reduce traffic volumes and speeds on quieter streets to well below 2,000 PCUs daily and 20mph motor vehicle speeds. It must be stressed that thus far, TfL and Westminster’s understanding of what is “high-quality” in these areas appears to be significantly different from LCC’s view. For parallel (and north-south) routes to be viable (as alternatives to Oxford Street etc.), they will require major interventions along their length, with most junctions redesigned, significant amounts of parking and through traffic removal etc.
- TfL’s Strategic Cycling Analysis further points out that even if one assumes there is high-quality provision nearby both north and south of Oxford Street, there will remain a high potential corridor for cycling east-west along the Oxford Street alignment (connecting to corridors running east, north-east and south-west in the Tottenham Court Road area), and a second potential corridor running north-south west of Oxford Circus.
- Given the issue above, it must be stated that if high-quality parallel provision for cycling is not provided sufficiently nearby both north and south of Oxford Street, it is likely significant numbers of those who currently cycle on Oxford Street will continue to do so, regardless of whether there is provision or a ban. This will, for many, be a far more sensible choice than facing the hostile conditions found elsewhere in the area and/or long diversions in their route. Very high-quality parallel provision nearby is therefore imperative to ensure not just those currently cycling in the area do not attempt to use Oxford Street as a through route, but also to enable far more people to cycle in the area.
- However cycling is provided for east-west, much more consideration must happen for north-south flows as well. Currently, the “West End Project” will enable more cycling north-south

at the eastern end of Oxford Street. But the Baker Street and Gloucester Place Westminster scheme will not enable similar at the western end. Cycling connections to the East-West Cycle Superhighway and CS9 should be prioritised at the western end, and the Baker Street and/or Gloucester Place schemes should be vastly improved for cycling. As per the east-west cycle routes and spacing for the Mayor's Transport strategy, it is over 800m from Oxford Circus to Baker Street (further to Gloucester Place), and also over 800m between Oxford Circus and Tottenham Court Road and the West End Project. This means that not only would Baker Street or Gloucester Place need to be urgently improved for cycling, but also Regent Street – to connect directly to CS11 and run south too. Indeed, given both LCDS and CROW plan for a far tighter network of cycle routes in city centres, in the medium term, it is likely at least two other north-south connections will be required in the area – one between Baker Street and Regent Street and one between Regent Street and Tottenham Court Road. Existing Westminster "Grid" proposals in this area fall far short of what could be considered "safe" or "high quality".

- All the crossing points for motor vehicle traffic north-south in this Oxford Street West consultation are on a street hostile to cycling. All these crossing points should deliver high-quality provision for cyclists crossing and visiting Oxford Street. The current plans for these crossings are not adequate to enable more people to cycle in the area than currently do, with streets designed to remain hostile to cycling.
- The proposals to deliver a "new two-way cycle route" along Harewood Place and Holles Street are welcome, given the point above. However, given likely traffic volumes and speeds on these streets from "buses, taxis and delivery vehicles", this route must feature physically-separate space for cycling in both directions, with turning movements and conflicts controlled appropriately also, to enable more people to cycle in this area. This route does not currently appear to feature such suitable provision.
- The wider area urgently needs far more radical and ambitious planning for traffic than is provided for in this consultation. Soho, Mayfair, Marylebone and Fitzrovia, the four neighbourhoods bordering Oxford Street, should be redesigned urgently as potential "low traffic neighbourhoods" (likely using a "modal filter cell" technique) where through motor traffic is restricted or removed but resident as well as delivery, servicing, emergency etc. motor vehicle access is maintained. Soho particularly needs urgent consideration with high pedestrian numbers, narrow pavements and high volumes of fast, aggressive driving.
- It is of great concern that there appears to be fairly advanced and detailed consideration for motorcycle bays, car parking bays, disabled car parking bays, diplomatic car parking bays, car club parking bays and electric car parking bays as well as loading bays and taxi ranks, but little detailed consideration yet for cycle parking (in terms of location, but primarily in terms of expansion etc.). Again, this does not give confidence that enabling cycling is being given appropriate consideration in this scheme. Retrofitting cycle parking to the late stages of a plan does not tend to result in high levels of accessible, appropriate cycle parking designed to cope with increasing use. On top of this, many of the streets earmarked for motor vehicle bays on both sides could and should be being considered for cycle routes north-south and

east-west. Development of many of the planned motor vehicle bays will preclude further improvements for cycling on these streets for many years. Motor vehicle parking bays and other on-street obstructions should be carefully considered and rationalised wherever possible to enable better cycling and walking, not more motor vehicle use.

- Taxis and Private Hire Vehicles are responsible for much of the congestion, emissions and traffic in this area of central London. Access to Oxford Street (including taxi ranks, north-south links etc.) for the minority who use taxis and Private Hire Vehicles should not be at a disproportionate cost to those walking, cycling and using public transport (for instance taxi ranks precluding wider pavements, better crossings or cycle tracks, or taxi and private hire vehicles in volumes such to reduce the amenity of Grid routes etc.).
- Maintaining moving motor vehicle capacity across the area (“some trips would take a little longer, some would take less time and others would be largely unaffected”) is not a desirable outcome likely to lead to “mode shift” to walking, cycling and public transport. Schemes should not be designed to maintain existing traffic capacity at the cost of walking, cycling and public transport improvements.
- It is likely that for the maximum possible benefits of a transformation of Oxford Street, any scheme should be permanent – 24 hours a day, seven days a week. Motor vehicle access should not be enabled at night. However, during periods with low pedestrian volumes, cycle access would be particularly beneficial – and so low footfall periods should particularly be considered with cycling through in mind. This should, for instance, potentially include the am peak where pedestrian footfall is set to remain low.
- Whatever design of scheme comes forward for Oxford Street East, and for cycle provision in further consultations, it is vital these elements all work in concert – so cycle provision in Oxford Street West works seamlessly with provision in Oxford Street East, and further connects to other routes and enables other desire lines in the vicinity, for instance directly to the east along the “London Boulevard” of New Oxford Street to Old Street.
- Smarter ways of managing deliveries, including “consolidation” and use of e-cargo bikes and smaller electric vans for the “last mile” should also be urgently considered to ensure the needs of businesses are met, at the same time as motor vehicle volumes and speeds are reduced across the area – again, this approach does not appear to be considered carefully in the current consultation. Similarly, any planning of a “mobility service” should consider human-powered transport as a potential method of delivering such a service.

General points about cycling schemes:

- LCC requires schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.

- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport mode for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all "Critical Fails" eliminated.