

## Oxford Street District

### Place Strategy and Delivery Plan Consultation Response

#### **Executive Summary**

This is a summary of our collated response to the Oxford Street District Place-shaping proposals, on behalf of the 600 businesses in the 74 streets we represent across the West End and Mayfair.

We are very encouraged by the approach taken and the commitment to £150m of new investment. The Place-shaping proposals, in particular the creation of a traffic-free gateway at Oxford Circus, a major intervention at Marble Arch and limiting entry to sections of Oxford Street to only bus services at peak times of the day, are essential for the safety of the public and the future prosperity of the district.

Investment in Oxford Street is much needed. It will benefit residents, workers and visitors alike and will make a direct contribution to several of Westminster City Council's (WCC) key policy objectives. As such Oxford Street and its transport gateways should be the first priority for construction and completion in time for when the Elizabeth Line is fully operational.

The benchmark for a high quality public realm scheme is how it looks and continues to function five and ten years later, as well as immediately after its construction. We therefore strongly encourage the creation of a new private-public sectors Task Force to scope and plan a world-class approach to place-management for the International Shopping Centre. Its operation, including waste and recycling, street cleansing, security and maintenance, should commence before, rather than wait until completion of the new public realm.

Street trader kiosks blight our district. They take up much needed footway space, obscure the rest of the district and at junctions may contribute to the poor road safety record. They are not compatible with the Place-shaping principles. Space may also be needed for hostile vehicle mitigation. Urgent action therefore needs to be taken. We therefore believe there is a compelling case in the public interest to remove trading kiosks.

The place-shaping proposals and the draft City Plan have to be complementary for Oxford Street to succeed in the future. It is important too that interpretation and enforcement of policy through planning and licensing decisions is also joined-up and follows the intention of the new policies, particularly in facilitating Oxford Street, Regent Street and Bond Street to benefit from their international Retail Centre status.

We welcome:

- the Place-shaping strategy proposals, which are district-wide and end-to-end and would like to see them delivered in their full entirety and;
- the £150m of new funding, which is additional to the borough's routine maintenance, LIP, Section 106 and CIL funding.

In summary our position is:

- i. The prioritisation needs to be more fine grain, based on a clear criteria and with fewer Priority One streets, limited to Oxford Street and the gateways alone, not least of all to protect the 50,000 jobs.
- ii. The Priority One streets should be fully constructed in time for the full operation of the Elizabeth Line (Reading and Heathrow to Abbey Wood and Shenfield).
- iii. Creation of a West End of traffic-free gateways, including Oxford Circus, and timed and traffic restricted access spaces on Oxford Street is essential for the scheme to have an impact.
- iv. The proposals for Marble Arch could be even more ambitious, creating a world-class traffic-free 'Great Space', with the gyratory removed and traffic lanes rationalised.
- v. Oxford Street should be reduced to two bus services, with other services terminating before reaching Oxford Street and general traffic managed and reduced across the wider district.
- vi. Restricted access to Oxford Street for taxis and other traffic; and alternative high-quality routes for cyclists should form a key strand of the proposals.
- vii. Street trading kiosks should be significantly reduced as a priority.
- viii. Freight, waste, recycling and deliveries preferred supplier requires a single district-wide approach.
- ix. Planning and licensing regulations need to support retail as well as enable flexible and changing leisure uses to support the economy, in particular the evening and night time economy.
- x. The district should be managed as a distinctive area, with a well-resourced, robust and strongly enforced management plan, rather than as an extension to WCC's street management services which should commence before, rather than wait until completion of the new public realm. Private sector property owners and managing agents offer to assist in a time-limited Street Management Task Force to oversee its development.

Finally, we will work with residents, WCC and other agencies to ensure these ambitious proposals are delivered as soon as possible and to benefit all stakeholders.

## Oxford Street District

### Place Strategy and Delivery Plan Consultation Response

#### Introduction

1. New West End Company welcomes the opportunity to contribute to the Oxford Street District Place Strategy and Delivery Plan consultation undertaken by Westminster City Council (WCC). The design, uses and management of both buildings and public spaces contribute towards the creation of a sense of place. As such we also welcome WCC's parallel City Plan informal consultation on changes to land use planning policy; and the recognition that places-shaping is influenced by the entire built environment – its buildings and public realm.
2. New West End Company is the Business Improvement District (BID) for the major shopping streets of London's West End. Comprising an Occupier BID and a Property Owner BID, we represent over 600 retail, hotel and property companies in and around Oxford Street, Regent Street and Bond Street. We are a leading business voice in the West End.
3. New West End Company has worked closely with WCC and others over twelve years to promote the growth of the West End and to address many of the issues that the district faces. In particular, we are members of the West End Partnership (WEP), which brings together representatives of all the major communities and interested parties in the West End to plan for its successful and sustainable growth.
5. We want to work with residents, Westminster City Council and other agencies to ensure these ambitious proposals are delivered as soon as possible and to benefit all stakeholders.
6. The delivery of the end-to-end and district-wide place-shaping strategy for Oxford Street in a consistent design, palette and materials can create a unifying, safe, distinctive and coherent Oxford Street experience. Removing through traffic from Oxford Street at peak times; and from many of its streets and gateways can improve safety and provide more pedestrian space. Limiting traffic speeds, which is essential to improving safety, will also contribute to creating a transformed space, designed for people.
7. The New West End Company also broadly welcomes the direction of the new draft City Plan, in providing some flexible commercial building uses, although we are keen to ensure that the City Council is sufficiently ambitious in its definition of "flexible". The West End is an international centre that competes with other global shopping and entertainment districts. It needs the flexibility to respond positively to emerging global

consumer format and themes, many of which probably do not exist and cannot be envisaged at the time of writing the City Plan.

### The importance of the West End

8. New West End Company strongly supports WCC's plans to enhance the Oxford Street District. The importance of the Oxford Street District, and the wider West End, to London and the whole UK are well documented within WCC's supporting documents. The WEP has outlined the direct impact of the West End on the economy showing a GVA of £51 billion, more than the City (£43.9 billion) and almost as much as the whole of Wales (£52 billion). It employs over 600,000 people. The West End is set to accommodate half of the 77,000 new jobs planned for Westminster by 2036.
9. Within the West End the Oxford Street District is a major feature and while other elements of the West End, in particular Regent Street and Bond Street, have benefitted from significant investment in public realm, Oxford Street and its surrounding district have lagged behind and no longer have the feel of a high quality, international shopping street.
10. If the West End is to retain its international status against increasing competition, both from traditional international destinations and from emerging competitors in the Middle East and Far East, it needs to evolve and invest in ways that respond to constantly changing customer trends and demands.
11. Globally, retailing is facing a structural change with the growth of online retailing and the changing expectations of new generations which sometimes differ in the West from the emerging consumer markets in the East. Any successful international retail centre needs to appreciate and adapt to accommodate these trends.
12. Specifically, to the UK, as Britain may leave the European Union and lose the benefits it gains from being a member of the Single Market and Customs Union, it is vital that London continues to be a draw to international talent, investors and visitors. The West End is a major part of this draw, offering a lifestyle unmatched in many other global cities that compete for the same talent, investment and visitors. Not only can the West End not afford to decline, it cannot afford to stand still. It must invest and evolve to remain a vital part of the attraction of London and the wider UK.
13. At a local level, the forthcoming opening of the Elizabeth Line, estimated to bring an additional 60 million visits annually, means that investment has to be made to provide a safe and comfortable environment for visitors and residents alike when visitor numbers rise by 40% above the current 200 million.

14. New West End Company appreciates that it is the unique mix of uses in the West End that makes it so special and attractive to worldwide visitors and investors. The scale, mix and quality of retail, culture, leisure and entertainment in such a concentrated space makes the West End a global attraction. The amount, variety and value of commercial employment throughout the West End provides an economic bedrock that supports the retail, leisure and entertainment offer. The seamless integration of thriving residential communities throughout the district provide a lively and human character that distinguishes it from soulless shopping centres. New West End Company recognises the importance of this special balance to the district's continued success and is conscious of the need to improve the environment for all elements of the West End's communities.

#### Response to the Place-shaping Consultation Questions

15. The following sections detail the response to each of the consultation questions. These were collated from the West End business community, including:
- A breakfast briefing conference on 21<sup>st</sup> November
  - Zonal workshops, held on 27<sup>th</sup> November
  - One-to-one meetings with business members
  - Consultation with the New West End Company Oxford Street Steering Group and Oxford Street Management Group
  - Consultation with the New West End Company Property Steering Group and its Strategic Board.
16. **Consultation Questions 3 and 4. The twelve principles for the Oxford Street District and three for Oxford Street – level of support and comments**
17. ***Principle 1 - Have easy access for all to a beautiful, safe, clean, well-managed and improved district***
- New West End Company strongly supports**
18. Oxford Street is known as 'The Nation's High Street'. As such it needs to be accessible, safe and appealing for all to use – residents, workers and visitors. With an ageing population, the need to make places safe for families and children and the right of people with a disability to enjoy the same access as everyone, the business community strongly supports this principle.
19. As outlined above, New West End Company believes that the mix of commercial, cultural and residential communities that make-up the West End are key to its strength and global appeal as a diverse, inclusive and cosmopolitan place. We strongly support the principle of easy access for all to an improved district.

20. We do not see improvement as a zero-sum game where one community benefits at the expense of another. We believe that all communities should, and will, benefit from good growth and the investment this attracts into improving the infrastructure, the offer and the day to day management of the West End.

21. ***Principle 2 - Support economic growth across the district***

**New West End Company strongly supports**

**Strongly support**

22. The West End is a major part of the economies of the UK and London but it faces continued and increasing competition both regionally and globally. It cannot afford to stand still and indeed, doing so will lead to its decline. Enabling and encouraging good growth is vital to the future success of the West End and to maximise the benefit of the massive investment made in the Elizabeth Line.

*A shortage of commercial space*

23. The first of the two growth-limiting challenges that the West End faces is the shortage of commercial space to accommodate forecast growth in job numbers. We are encouraged that the emerging City Plan recognises the need for significantly more commercial space to be developed in the West End. But we are concerned that requirements for 35% of all commercial development to be affordable housing will freeze new commercial development and make it hard to deliver the quantity of commercial space required.

24. WCC already has ambitious jobs growth targets of 77,000 new jobs by 2036, half within the West End. Para 2.5 of the emerging City Plan cites scenario testing for the West End by Arup (2018) which projects potential for an uplift of 96,000 jobs by 2041 across the wider West End. We are concerned however that the apparent requirement for on site housing for Oxford Street developments firstly absorbs jobs growth capacity and will sterilise the future flexibility of the commercial district.

25. Para 14.3 of the City Plan cites the London Office Policy Review estimate of a further 75,000 office based jobs in Westminster between 2016-41. This, it says, will require as much as 850,000 sq m of additional office stock.

26. Para 15.3 of the City Plan quotes GLA forecasts of the need for between 464,865 sq m and 579,194 sq m (gross) of new comparison retail floor space in Westminster.

27. Research commissioned by Westminster Property Association from Volterra, based on an assessment of the mix of future jobs and the space needed to accommodate this mix, estimates that around 1.9 million square meters of additional commercial space will be required to house the earlier 77,000 jobs growth target.

28. This figure is a net figure and has to be in addition to the replacement of any existing commercial space lost in Westminster, particularly through conversion to, or replacement by, housing. In its consultation paper "Building Height" WCC states that "being at the heart of a world city there is no room for a 'no growth' option". The City Council continues "we have to find an additional two million square metres of business floorspace to accommodate an additional 77,000 jobs and to make up for the significant amount of office space we have lost to housing since 2005".<sup>1</sup>
29. Providing this additional commercial space will require a mix of policies including densification, greater height, better use of existing space and innovative working ideas.
30. The Arup Report into West End Good Growth (November 2018), commissioned by the Mayor and Westminster City Council looks at different scenarios for future economic activity in the West End. It suggests that if the recent trend of net loss of commercial space was to continue (mainly because of commercial space being converted to residential) far from being able to accommodate these ambitious job growth targets, job numbers would actually fall of 21,000 gross jobs in the West End by 2041. A "decline of sorts" scenario would see West End gross employment drop by 58,000 by 2041. It is only the "good growth" scenario (a net increase of 1.3 million sq m of commercial space) that delivers sufficient accommodation to allow net job growth in the West End of up to 96,000 by 2041.
31. We note the reference in 2.4 of the emerging City Plan to "new developments with increased scale and massing ...along Oxford Street" and would appreciate more specific guidance on this and how much increased scale and massing would be required to accommodate the job growth targets agreed by the City Council.
32. We welcome the proposal that retail development is not subject to the emerging mixed-use policy and would not need to contribute to affordable housing. We also welcome, in policy 15D, the exemption of the International Centre from the policy to support residential use in upper floors of town centres.
33. We are very concerned, however, that proposals within the draft City Plan which state that hotel and office developments over 1,000 sq m will require 35% of the floorspace to be affordable housing on site (9G) will freeze major development in the CAZ. Many developers will not wish to create housing for sale within commercial developments because this will prevent future redevelopment of the building. It is also likely that the requirement to provide affordable housing will make developments unviable even if the housing is sold. If the housing is for rent, in order to retain the ability to redevelop the building in the future, this will not provide the returns necessary to make the

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<sup>1</sup> "Building Height: getting the right kind of growth for Westminster" March 2017

development viable. We are very concerned that the policy risks freezing commercial development as developers await future policy changes.

34. The 850,000 sq m of additional commercial space cited in the Plan is already a hugely challenging target that will require radical policies if it is to be delivered. Adding a further 297,500 sq m to meet the proposed affordable housing policy will make an already very difficult target almost impossible to meet.
35. While we appreciate that policy 9H allows, where the development is within the WERLSPA, for the 35% affordable housing requirement off-site but within the Special Policy Area we are concerned that sites will be difficult to find and this will again prevent much needed commercial redevelopment.
36. We would ask Westminster City Council to explain how policies 1C, 9G and 9H can be reconciled to provide more commercial space and more affordable housing. While each on their own is a commendable aim, taken together we fear they will prevent growth of both housing and commercial space. This will have a serious negative impact on the City Council's housing policy aims and the commercial growth of the West End.
37. Failure to achieve the additional commercial space required would also damage business rate growth and therefore, potentially, additional financing for the City Council). The Arup Report suggests that the "decline of sorts" scenario would lead to a fall in business rate income by 2041 of £1.5 billion annually (-52%). In contrast the good growth scenario delivers an estimated £4.9 billion of business rate growth by 2041, a 168% rise for Westminster.
38. Given the importance of both these policy areas, our professional concerns about the negative impact of these combined policies on future job growth and housing numbers, and the significant drop in job numbers and business rate growth forecast by Arup of failing to provide the necessary growth of commercial space we believe that this is such a serious matter that the City Council should test the likely impact of these particular policies on future provision of commercial space. We recommend that the City Council seeks an independent assessment of the likely impact of these policies on the provision of affordable housing and commercial space in Westminster.
39. In addition we believe that mixing residential with the scale of retailing in and around the major shopping streets will lead to problems both for new residents and local councillors. In particular we believe that the existing and future operation and servicing of stores may create a series of local concerns for people living in new homes nearby which will be difficult to resolve satisfactorily.
40. The West End clearly needs additional commercial space to be created and there would be great economic and financial benefits to both businesses and the public sector in

providing it. To meet the challenge of providing sufficient new commercial accommodation New West End Company believes that WCC should:

- continue with the current mixed use policy to enable the maximum area of new commercial space to be created on Oxford Street without having to provide a housing element on site.
- relax the restrictions on the height of development in the CAZ. WCC is currently consulting upon appropriate locations for bigger and higher buildings and roof level extensions to meet growth targets. The Oxford Street district is ideally located for bigger and higher buildings given the exceptional public transport accessibility, scale of existing buildings and streets and significant potential for place-making.
- consider other changes to local planning policy, such as rights of light, which would facilitate greater commercial development. The reinforcement of outdated daylight and sunlight guidelines for development within commercial districts could significantly hinder growth.

*Evolving retail trends and fierce global competition*

41. The second growth limiting challenge New West End Company identified was the Evolving retail trends and fierce global competition.
42. The West End needs to evolve constantly to lead and respond to changing retail trends driven both by online retailing and by national and global competitors. This will require greater flexibility and more imaginative uses and attractions to continue to appeal to visitors and investors. New West End Company has identified a range of policy areas where change is necessary to enable the West End to retain its global position. These are outlined below.
43. The West End needs to adapt constantly to lead and respond to changing retail trends driven both by online retailing and by national and global competitors. This will require greater flexibility and more imaginative commercial building uses and attractions to continue to appeal to visitors and investors. New West End Company supports three main policy changes in the City Plan, which are necessary to enable the West End to retain its global position. These are outlined below.

*Encourage a broader range of uses including leisure, culture and civic amenities*

44. Currently the Oxford Street district is largely dominated by retail with office uses above ground level. In accordance with best practice from other world leading cities and retail centres, there needs to be a broader range of leisure, cultural and civic uses, which will improve the wider offer within the International Centre. We need to enhance the West

End's identity and attraction to a wide range of visitors and increase the dwell times within the district, including during the evening.

45. Such a range of uses would be expected within an International Shopping Centre given the number of visitors, and they are critical to realise fully the area's potential during the day and evening, especially given its exceptional public transport accessibility.

46. We support the policies in the draft City Plan which recognise this changing need, in particular:

"The intensification of the WERLSPA over the plan period (to) deliver:

"2C an improved retail and leisure experience that responds to innovation and change in the sector, including the transformation of the Oxford Street District"

*Expand and define the boundaries of the International Shopping Centre and West End Special Retail Policy Area*

47. The West End Retail and Leisure Special Policy Area (WELSPA) is welcome as this expands the boundaries of the International Shopping Centre and WERLSPA to surrounding streets, reflecting the significantly enhanced pedestrian movements after the opening of the Elizabeth Line. These nearby streets will play a key role in enhancing the overall function of the Oxford Street district by linking retail, entertainment and cultural aspects of the West End into a coherent and mutually beneficial offer for visitors.

48. The new policy needs to help to provide the mix of uses needed to transform Oxford Street into a modern retail district. Indeed, with some entrances/exits to the Elizabeth Line stations being one block back from Oxford Street, these streets will automatically acquire a new role, character and set of movement patterns and certain of them, could also be made traffic-free.

*Promote the evening economy of the Oxford Street district and promote a cultural strategy*

49. The evening economy across the district is currently limited and Oxford Street itself is largely inactive once the major retailers close. Activation in the evening can make it more difficult for anti-social behaviour to take place. There is the potential for significant enhancement of the evening economy in the district and along Oxford Street in particular (as it is relatively unconstrained by local residential uses). The district would also benefit from an active cultural strategy that proactively seeks to enhance the existing very rich cultural and entertainment offer in the district. These will have a major beneficial impact upon retail trade in the evening and as part of the supporting offer of the district.

50. We support the policies in the draft City Plan which recognise this changing need, in particular:

“The intensification of the WERLSPA over the plan period (to) deliver:

“2D a diverse evening and night-time economy and enhanced cultural offer”.

**51. *Principle 3 - Design and manage the district for flexibility***

**New West End Company strongly supports**

52. Oxford Street and its surrounding district have the potential to be used for a variety of activities and events at different times of the day and year. We support the principle that future design should allow the flexibility to enable different uses of buildings and public spaces at different times. This need to be supported by an active programme of events and activities, founded on a cultural strategy for the district and enhanced by other activities organised by business and other communities. This will also require a facilitating approach to planning, licensing and traffic management requests, including allowing, rather than the current practise of restricting event activity.

**53. *Principle 4 - Enhance the area’s remarkable assets and improve connections in the district***

**New West End Company strongly supports**

54. This principle is only achievable if Westminster removes all street trading kiosks from Oxford Street at the outset of the project. The kiosks act as significant physical barriers to exploration of the rest of the district, as well as block much needed footway space and detract from the experience of visiting Oxford Street.

55. Much of the district, just metres from Oxford Street, are underused and underappreciated. The opening of the Elizabeth Line will bring an additional 164,000 visitors every day through station entrances, most of which lie south of Oxford Street. This will intensify the use of side streets to reach the main shopping streets. Wayfinding, including intuitive wayfinding, and lighting will be important to encourage exploration and enjoyment of the retail, commercial and cultural quarters of the Oxford Street District.

56. New West End Company is actively supporting programmes to enhance the squares and streets around the new station entrances. We fully support more innovative design and planning to encourage visitors to make more use of underused streets, whilst always being aware of the need to protect and enhance residential amenities.

**57. *Principle 5 - Prioritise pedestrians***

**New West End Company strongly supports**

58. Oxford Street is already uncomfortably and dangerously overcrowded at many times of the day, as detailed in the WCC report. The opening of the Elizabeth Line will add to this. It is vital, if visitors are to be attracted to the West End and encouraged to stay

longer, that they have a comfortable and enjoyable experience. Traffic-free gateways, particularly at Oxford Circus, restricted access for buses only at peak times and widened footways throughout are much needed, therefore strongly welcomed.

59. New West End Company's development and funding towards the Bond Street public realm project with WCC, TfL and businesses, achieved an increase of 65% in pedestrian space. The proposals for Hanover Square will provide 160% more pedestrian space and a traffic-free gateway to the West End. In both cases there is still vehicle access.
60. A comfortable visitor experience requires more pedestrian space, less street furniture clutter, good places to rest and clear wayfinding to make their trip around our district easy and enjoyable. We would welcome assurance that pedestrian comfort level analysis will be undertaken and the proposals will deliver a significant improvement.

61. ***Principle 6 - Make the district better for cycling***

**New West End Company supports**

62. New West End Company supports cycling in the district and calls for better facilities for cyclists throughout the West End. Cyclists and pedestrians do not mix well in heavy footfall areas and collisions can occur. The relaxation of shoppers is disturbed by fear of cyclists, particularly those who use pavements rather than carriageways. It only takes a few cyclists to use pedestrian areas to make the area feel unsafe.
63. We therefore welcome the development of two alternative east-west routes for cyclists and encourage the restriction of access to Oxford Street for the comfort and safety of both cyclists and pedestrians.
64. We also believe that every effort should be made to ban the use of pedicabs in the Oxford Street district and throughout the rest of the West End.

65. ***Principle 7 - Create beautiful streets and public spaces across the district***

**New West End Company strongly supports**

66. Recent public realm improvement on and around Regent Street and Bond Street have set a high standard which needs to be continued throughout the West End. Oxford Street's public realm has deteriorated over recent years and anticipation of Elizabeth Line related improvements has held back repairs and upgrades. We fully support enhancing the District's public realm with high quality materials that can withstand the high level of usage, easy to clean and maintain.
67. We support the use of different materials to distinguish different neighbourhoods but within a standard palette that reflects the wider West End.

68. Fibre to buildings should be introduced by providers as part of every public realm scheme, to ensure future Wi-Fi, broadband and 5G are reliable and fast, which is consistent with WCC's planning Policy (draft City Strategy, Section 31).
69. We also encourage provision of electrical supply for seasonal activations and 5G-ready connections through street lamp columns.
70. We strongly support the need to create iconic and traffic-free gateways at Tottenham Court Road (St Giles area), Dean Street, Oxford Circus, Hanover Square, Marylebone Lane, Davies Street and Marble Arch so that visitors emerging from underground stations get a feeling of awe as they emerge into the West End. The proposals for Marble Arch could go further, with Mayor of London and Transport for London (TfL) support, taking this once in a generation opportunity and building on the design work commissioned by the Portman Estate, to create a truly traffic-free and welcoming gateway befitting of its status as a world-renowned district.
71. We strongly support the creation of world class event and cultural spaces but believe these need to be well-managed and curated as part of a district wide cultural strategy.
72. ***Principle 8 - Enrich the cultural life of the district***  
**New West End Company strongly supports**
73. The West End has unique, diverse and rich cultural assets, including the world famous Palladium Theatre, The Photographers Gallery, The Royal Academy and hundreds of independent galleries, many of which are currently under-utilised. The cultural offer of the wider West End is a major attraction of the district and helps to create a package of attractions to appeal to visitors. However, within the West End, the Oxford Street district has little cultural life. In particular, it ceases to have attractions when the shops close and, unlike most of the West End, is relatively quiet in the evenings.
74. It is an ideal area for evening activities since the positioning of the tube stations and bus stops largely retain people on Oxford Street rather than encouraging them to leave through residential areas.
75. Building on the recent illuminations of the Henry Moore and Barbara Hepworth sculptures, investment in the public realm is an opportunity to bring what is often perceived to be exclusive art to the people. Oxford Street is also an ideal area for evening animation and activities since the positioning of the tube stations and bus stops largely retain people on Oxford Street rather than encouraging them to leave through residential areas. Links to existing district offers such as The Wallace Collection should be prioritised.

76. The curation of enhanced and creative lighting (as well as dark spaces for contrast), more public art, distinctive public realm furniture and world-class design will all add to the overall spectacle of the West End.

77. ***Principle 9 - Create much more green space, including many more street trees***

**New West End Company strongly supports**

78. New West End Company has long supported greening the West End as a key element in enhancing its appeal. Significantly more greenery is both good for the environment, contributing to the aims of the Wild West End, and softens the streetscapes to create a better experience for visitors. We encourage the creation of green oases spaces on side streets from Oxford Street.

79. New West End Company's pilot West End Garden on Old Quebec Street, based on its Gold Medal winning Chelsea Flower Show garden, demonstrates how previously underused and uninspiring side streets can be turned into green oases for visitors and residents. Sustainable urban drainage (SUDS) can reduce water run-off, as well as enhance green spaces and create habitats for wild-life in public realm schemes. Imaginative opportunities, such as reintroducing elements of the Tyburn River, as natural habitats and shallow, informal play spaces, could be created in the South Molton area.

80. ***Principle 10 - Have an improved management plan to ensure the district is safe and well maintained***

**New West End Company strongly supports**

81. The effective and comprehensive management of the Oxford Street District – and the wider West End – is vital for its future success. Visitors, employees and residents need to feel comfortable in a safe, clean and well-maintained area, which is free from antisocial behaviour. A new regime should be implemented ahead of any public realm interventions rather than after.

82. The Oxford Street District current fails to meet acceptable standards in all these areas and looks poorly maintained when compared to places such as Covent Garden, Westfield and Kings Cross. Bags of rubbish, unemptied, leaking bins, broken telephone boxes and street furniture, broken and stained paving, aggressive begging, chugging and a rising number of homeless people sleeping in doorways are amongst the challenges. Perpetual and disruptive utility and street repair works affect the retailing environment and the experience of being in the West End.

83. Recent innovative collaboration with the Metropolitan Police, Westminster City Council, New West End Company and homeless charities has created a multi-agency team approach, which seeks to address the issues of rough sleeping and homelessness.

84. We recognize the scale of challenge in waste and recycling collection. The forthcoming Environment Bill may reduce the burden of on-street waste. We welcome WCC's recent work to create water-tight bins, so liquids such as coffee does not stain footways. We encourage their roll-out across the West End. In addition, parts of the district's streets are used to store large bins. These should be relocated and stored within the footprint of properties wherever feasible and if not possible, appropriately located and screened - perhaps with small green walls.
85. The growth in visitor numbers and significant additional pedestrian space demand a well-designed and funded, comprehensive street management plan. With police and local authority budgets under strain we need to consider new ways of financing and delivering effective street management services that are befitting of an international shopping centre that benefits residents, employees and visitors alike. Simply making marginal changes to existing management programmes will not be enough.
86. We propose managing the West End (see paragraphs 158-165) as a distinctive area, in which place-management follows the boundary and approach of the Place-shaping strategy. The International Shopping Centre area or alternatively the wider WERLSPA provide distinct boundaries in which service levels and service providers can be different. This is necessary due to its high footfall of 200 million visitors a year. The new Management Plan should cover all streets and incorporate the current Bond Street Management Plan into a wider district approach, be fully funded and with clarity over how it will be funded.
87. ***Principle 11 - Improve safety***
- New West End Company strongly supports**
88. Safety of visitors, employees and residents should be paramount. Work has been completed by TfL to identify the areas of Oxford Street where there are high incidents of collisions (specifically in east Oxford Street). The proposals to create traffic-free or restricted traffic sections and at key times of the day, are a welcome contribution to improving safety.
89. We support the introduction of a 20mph zone throughout the district, including the inner ring road at Marble Arch.
90. People also need to feel safe from other threats. While we stress the need for the district to be open and welcoming we would like to explore with WCC how potential security risks – such as hostile vehicle attacks – can be lessened through subtle design features (see paragraphs 173-177).

91. Finally, the removal of street trading kiosks altogether can provide much needed footway space, improve sight lines, therefore improve road safety at junctions.

92. ***Principle 12 - Improve air quality***

**New West End Company strongly supports**

93. Improving air quality is a key issue for New West End Company. We feel that we have an obligation to those we seek to attract to the district to ensure their safety and good air quality is a part of this. We have actively promoted freight, waste recycling and personal deliveries consolidation in Bond Street and east Mayfair.

94. We fully support the early introduction of ultra-low and zero emission vehicles at tailpipe in the West End and continue to lobby the Mayor to restrict Oxford Street district to zero emission buses and WCC to restrict access to only zero emission at tailpipe vehicles.

95. We actively support local initiatives to improve air quality such as the Marylebone Low Emissions Neighbourhood and we have tested ground-breaking technologies in our Bird Street Smart Street pilot that included an air purifying bench and pollution-eating paint. Businesses are happy to continue investing in initiatives to improve the local air quality but believe that managing vehicle emissions is the key priority.

96. ***Oxford Street Principle 1 - Offer a wider range of attractions beyond traditional shopping***

**New West End Company strongly supports**

97. The structural changes in the retail sector are leading to a different mix of experiences and uses to meet evolving consumer trends and demands. It is likely, in future years, that there will be fewer traditional retail units on Oxford Street and more entertainment, leisure, food and beverage; as well as more office space. To retain the vitality and viability of the West End the district will need to offer a range of different formats and experiences which shopping experience and complementary retail uses combine to draw visitors to the West End and encourage them to stay longer.

98. We are pleased that Westminster City Council has taken some steps towards reflecting this in its City Plan (Policy 2C) and has already, in granting permission for complementary uses in units that used to form part of the former BHS store, established the principle.

99. We are also encouraged that the draft London Plan states, in policy SD4 part F:

“The vitality and viability of the international shopping and leisure destinations of the West End (including Oxford Street, Regent Street, Bond Street and the wider West End

Retail and Leisure Special Policy Area) and Knightsbridge together with other CAZ retail clusters should be supported.

“Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters above should be enhanced, supporting their adaptation and diversification, along with improvements to the quality of the environment and public realm”.

100. As an International Shopping Centre the West End needs flexibility in planning policy to attract uses that are both cutting edge and of a quality that will allow the West End to compete with other global shopping and entertainment centres, attracting visitors not just from the UK from around the world. Oxford Street is more than the ‘Nation’s High Street’ - it is also an international shopping street which competes with the likes of Fifth Avenue, the Champs Elysees and the Dubai Mall. The draft City Plan recognises its international status and need to enable world class attractions when considering complementary uses.
101. We support Westminster City Council’s proposal to support “further diversification of the evening and night-time economy...and late night shopping” (Paragraph 2.7, City Plan). In particular, London’s two International Shopping Centres are at a competitive disadvantage with most other global shopping districts over Sunday trading. The 1994 Sunday Trading Act restricts large stores (over 250 square meters) to opening for no more than six consecutive hours between 10:00 and 18:00 on Sundays. Most West End shops open from 12:00 to 18:00 but would like to open a few hours later (but not earlier), as they do throughout the week. We believe that stores within the London International Centres should be added to the list of exemptions in the 1994 Act.
102. The planning/enforcement bodies at Westminster City Council are not aligned with the proposed City Plan policy. For example, in regard to digital screens retailers ability to be innovative and provide an experience for shoppers is restricted. Earlier proposals included a number of buildings with architectural lighting and signage above 1<sup>st</sup> floor level (eg REISS), whereas current WCC policy is to refuse all video screens/digital displays/high level signs except for “areas such as Piccadilly Circus where existing advertisements make a positive contribution to their character and appearance”. We suggest that Oxford Street should be added to Piccadilly Circus, so that applications for signage can be assessed and approved if appropriate for an international class retail experience.
103. ***Oxford Street Principle 2 - Make Oxford Street spectacular***  
**New West End Company strongly supports**
104. We strongly support the principle of transforming the major West End gateways into iconic places that welcome visitors and provide space for constantly changing activities to draw people repeatedly into the West End and encourage them to stay longer.

105. We also support the concept of the Oxford Street District (and the wider West End) being at the forefront of retail development worldwide with new concepts, new stores and new experiences. The West End must continue to be the place where businesses chose to open their UK and European flagship stores. Visitors must know that only by visiting the West End will they get the widest range of shops and the fullest range of goods and services.
106. We support the creation of a more spectacular streetscape with improved signage and more lively, clean, quality frontages on buildings at all levels. We also support more rooftop activity as recent developments on stores such as John Lewis and Selfridges have demonstrated.
107. Achieving 'spectacular' requires a curated programme of world-class animations. The new public spaces and existing architecture creates an ideal canvas for lighting, art and cultural animations of the public realm.
108. More creativity and flexibility in the use of digital screens and activations needs to be allowed in policy, permissions and enforcement. Our expectation is that planning decisions and enforcement will be aligned with the policy for new innovations and trends, including digital advertising or signage appropriate for an international class retail experience. Appropriate digital activation of flagship retail can add to the visitor experience, differentiate from on-line shopping, and add to the animation of the public space.
109. Finally, achieving 'spectacular' requires world-class management, particularly cleansing, maintenance, security and welcome to visitors, otherwise the experience we are seeking will not will realised.
110. ***Oxford Street Principle 3 - Embrace Oxford Street's role as an important transport corridor for the West End***  
**New West End Company supports**
111. We suggest that the principle is re-worded as '***Embrace Oxford Street's role as an important sustainable transport corridor for the West End***'.
112. While we recognise the importance of Oxford Street as an east-west route we believe that the priority of the International Shopping Centre as a place and destination for pedestrians should take precedent over the transport needs of vehicles, therefore we welcome the proposed peak time restrictions. Moreover, increasing access to general traffic and private vehicles would be detrimental to the experience and safety of using Oxford Street.

113. Until recently, large numbers of buses, often virtually empty, used Oxford Street as the beginning and end of their routes, providing little service on Oxford Street and creating an unwelcome, unhealthy environment for pedestrians. We warmly welcome the Mayor's decision to remove bus routes from the West End in response to the additional public transport capacity created by the Elizabeth Line. We look forward to further reductions and the relocation of terminating services and bus stands from the Oxford Street district to less congested footfall areas outside of the West End. Moreover, buses should terminate before crossing Oxford Circus, reducing the impact at this key gateway to the district.
114. Just as businesses are reducing the number of heavy and light vehicles in the West End through organised freight and waste consolidation schemes we believe that similar schemes, backed by multiple use, hop-on/hop-off tickets, should reduce bus numbers by consolidating passenger use in the district.
115. In earlier consultations New West End Company argued for bus and other traffic movement during night time hours to provide additional activity and security to reduce anti-social behaviour in the district at night. We therefore support 24 hour buses on Oxford Street.
116. It is, however, important that pedestrians should take priority and feel safe and comfortable. This means reduced vehicle numbers, reduced vehicle speeds and a swift transition to 'zero emission vehicles only' on Oxford Street. But this must be done largely by reduction in vehicle numbers rather than displacement into neighbouring streets. The provision of taxi ranks near to major stores and stations should reduce the need for taxis to cruise empty along Oxford Street.
117. **Consultation Question 5 – Are there any other principles to include?**
- No
118. **Consultation questions 6 and 7 - Elements of the Place Strategy to put the principles into practice – level of support and comments**
119. Mix of land uses, the need for more space and more flexibility in retail and leisure uses are critical to the future success of the Oxford Street District; have been covered in the preceding sections and are also covered in our response to the draft City Plan.
120. Walking is the predominant way of travelling around the Oxford Street District and as such space and resources should be allocated in support of the pedestrian. This is particularly the case in the areas of very high footfall, on and around Oxford Street, which therefore should be prioritised for investment in renewed public realm and additional space for pedestrians.

121. Buses – TfL has an important role to play in providing services to and through the West End throughout the day and night. Almost fifty percent of night bus users are people travelling to work. We therefore welcome the continued provision of buses to the boundary of the International Shopping Centre zone, where it becomes a distinctive area primarily for people on foot. We also welcome a small number – two – bus services through the district to maintain accessibility.
122. Cycling – the provision of mandatory, segregated, safe and continuous cycle routes is the symbol of a civilised society and important to many Londoners. The business community supports the proposal to introduce two cycle east-west routes and encourages that these are designed and constructed to a high standard to support more and safe cycling. Cycling, however, does not work in areas of high footfall. It can lead to conflict and collisions involving pedestrians and cyclists. Consequently, we do not support the proposal to allow cyclists to use Oxford Street. Better alternatives should be provided.
123. London taxis – Taxis remain a part of the mix of traffic and an iconic symbol of London. To minimise the impact of taxis circulating the West End in search of passengers, kerbside space for taxis should be prioritised at prominent locations, such as station exits and department stores, over private car parking. The proposal to restrict through traffic on Oxford Street at peak times is welcomed.
124. We encourage TfL to analyse demand for taxis at different times of the day, week and month and issue licences for the International Shopping Centre area according to the level of demand.
125. General traffic – Oxford Street has benefited from being predominantly restricted to pedestrians, buses and taxis. Opening up Oxford Street to general traffic would negate all public realm benefits, therefore is not supported by the business community.
126. Goods vehicles, servicing and deliveries – we welcome the commitment to consolidation of services and will work with the boroughs, businesses and other stakeholders in the coordination of a consolidated approach for the West End. We believe it is now time for TfL to move forward from piloting freight initiatives to mainstreaming their delivery with dedicated resources and coordination.
127. Management – the need for a step-change in place management is discussed in sections 81-86 and 158-165.
128. Accessibility for all – we encourage designing streets for children, older people and disabled people as part of an inclusive and civilised approach that welcomes and encourages everyone to visit the West End.

129. Utility companies will need to be offered and encouraged to take the opportunity to renew their infrastructure and even bring forward its replacement as part these works in order to avoid the disruption of future road works on Oxford Street.
130. **Consultation Question 8 - Delivery Plan – 9 zones**



131. **Zone A: Marble Arch, a historic asset for the district, is the gateway to Oxford Street, Hyde Park, and the west, playing a critical role in movement through the centre of London**
132. Few places in the West End offer significant spaces that can be used differently. Marble Arch, currently severed by dual carriageways and bus stands, offers a unique opportunity to create a world-class gateway to Oxford Street and Hyde Park, while also improving safety and air quality and reducing traffic dominance.
133. The proposals on the consultation are a useful start. We encourage the traffic and highway authorities for Marble Arch to work with local estates and stakeholders to take these proposals further by looking to better connect Marble Arch with Hyde park, Oxford Street and the Underground station. Building on comparable projects in other parts of London, the traffic dominated streetscape can be transformed by reducing lanes and introducing two-way working.
134. Marble Arch station currently is not step-free. We encourage TfL to include the development of step-free access plans as part of its medium to long term business plan.
135. **Zone B: A number of flagship stores are located here, as well as hotels, connecting with neighbouring residential areas**

136. Both Zones A and B are unique in their continuing role in carrying private vehicle through the district. As such they will require a greater degree of intervention to ensure they do not become the poor relation economically to their neighbouring zones. Zone B currently feels like a route to the core part of Oxford Street, from Marble Arch to Selfridges. We welcome the overall place-shaping strategy, which is much needed for this section of Oxford Street. In addition, carefully curated animation of the footways could encourage more visits and dwell time in Zone B.
137. Pedestrian movement and safety could be improved at the gateway between Zones B and C with the introduction of a diagonal crossing, similar to the current design at Oxford Circus. This would also assist making the retail environment in Zone B more vibrant.
138. We would not welcome an increase in buses turning and standing in this area, using Orchard Street, Portman Street and Portman Square. The impact on the side streets in OSD needs to be carefully considered to preserve overall amenity.
139. **Zone C: Home to the world famous Selfridges department store, Oxford Street connects Baker Street and the Mayfair streets of Duke Street, Orchard Street and North Audley Street**
140. We welcome the proposal to create a reduced vehicle space outside Selfridges, as one of the key landmarks of the West End. Restricting access at peak times will create a better space for people. It is however important that its design, materials and construction are robust so that they can withstand heavy traffic at other times of day; and the recent Department for Transport (DfT) letter to Chief Executives on shared spaces is observed.
141. We are very supportive of the enhancement to Barrett Street and the importance this has in linking the new Selfridges entrance and St Christopher's Place and the pocket park proposed for Bird Street.
142. We welcome the proposals for pocket parks on Bird, Lumley and Balderton Streets.
143. There is also an opportunity to design Duke Street as a coherent and distinctive destination in its own right, linking the green spaces of Manchester and Grosvenor Squares and accentuating the Wallace Collection, potentially by bringing some of its art into the public realm with light animations.
144. **Zone D: Connects south Marylebone with the heart of Mayfair, Bond Street and the new Elizabeth Line, it is characterised by a network of historic streets**
145. We welcome the proposals for Davies Street and Stratford Place; and encourage consideration of seeking strategic opportunities to reintroduce greening – and even

potentially water in the form of sustainable urban drainage - to this part of the West End.

146. We similarly welcome the proposals for the forks of Marylebone Lane, Vere Street and Chapel Place, with the opportunity for a new public realm design and lighting to extend a traffic-free, or vehicle access only, route that links Oxford Street with Marylebone High Street.
147. **Zone E: The Cavendish Square to Hanover Square connection – providing links to green spaces and the new Elizabeth Line**
148. The business community welcomes the proposals for Cavendish Square and its linkage to the more advanced designs for Hanover Square. Cavendish Square has become a service area for the Oxford Street district, spoilt with large bin storage and bus stands. The square itself seems inaccessible due to wide traffic lanes, fast moving traffic and brick walls to the gardens. The proposals to reduce the dominance of traffic, make the garden more accessible and extend it to its corners are welcome. We encourage more intensive greening at the concept design stage, including creating natural habitats and sustainable urban drainage; as well as early addressing the management challenges associated with Cavendish Square.
149. **Zone F. Oxford Circus, the set piece adjoining Oxford Street and Regent Street is an iconic destination and unique arrival point for many visitors to the district**
150. As outlined earlier in this response, New West End Company and the business community are very supportive of the proposals for a traffic-free gateway at Oxford Circus. The proposals – and road safety – could be further enhanced by the relocation of bus stands and terminating bus services in the Oxford Circus area to beyond the west End. This would free-up much needed kerb side space for other uses. Moreover, footway widening and de-cluttering should be extended as far south and north on Regent Street as is practical.
151. Oxford Circus Station is London's fourth busiest station and passenger numbers are predicted to further grow in the future. The station is over-crowded at peak times. The traffic-free proposal for Oxford Circus enable TfL to develop new proposals for a capacity upgrade and step free access to Oxford Circus station. We strongly encourage that a capacity upgrade to Oxford Circus station is included in TfL's investment plans.
152. **Zone G: This area is characterised by the concentration of flagship stores it also provides connections through its side streets to East Marylebone into the north and Soho in the south**
153. New West End Company encourage opportunities to introduce additional greenery, such as parklets to streets from Oxford Street, both in Soho and Fitzrovia. New West

End Company is currently working with estates, the Fitzwest neighbourhood Forum and the Wild West End on a project to introduce a garden to the Market Place area; and a project to create a better space for people in the area of the Photographers' Gallery in Soho. In addition, we have supported the Berners Estate's proposals to improve Berners Street and Wells Mews, which are funded and can be taken forward as part of this Placeshaping Strategy.

154. **Zone H: This zone plays a key role in connecting Soho and Fitzrovia, and facilitating movement across the district and beyond with its new connections to the Elizabeth Line, with a diverse range of smaller shops and cafés**
155. We welcome the focus on footway widening on both Oxford Street and side streets, in this area, which currently has a poor collision track record and over-crowded footways. We would welcome reassurance that the Dean Street station entrance will be traffic-free, and as a minimum our proposal for a double-width raised surface pedestrian crossing on Oxford Street, akin to the design south of St Paul's Cathedral, will be included in the design. This is essential for the high footfall from the Elizabeth Line to the commercial streets immediately north of Oxford Street.
156. **Zone I: This is a primary gateway to Oxford Street and arrival point from the new Elizabeth Line, linking the district with Tottenham Court Road and Bloomsbury, New Oxford Street, Holborn, St Giles, Seven Dials, Covent Garden and Charing Cross Road**
157. We welcome the proposals to restrict traffic in this zone at peak times. This will benefit pedestrians, who will be the primary road-users, in increasing numbers at this key gateway to Oxford Street. We also welcome reimagining the Hanways as a distinctive destination and also as a route for pedestrians to and from Tottenham Court Road and Bloomsbury.
158. **Consultation question 9 - Any additional projects to include**
159. We strongly encourage the introduction of fibre to buildings in every street in the delivery of the placemaking strategy to ensure the West End is future proof for digital connectivity.
160. **Consultation question 10 - Other issues**

## **Delivery**

161. We welcome the commitment to substantially deliver a scheme within three years, which coincides with the full operation of the Elizabeth Line.

162. We support the prioritisation approach but encourage a more fine grain methodology, graded one to five and with fewer 'Priority 1' schemes, in order to ensure the highest priority areas are delivered first of all.
163. The areas of most need are Oxford Street and the station gateways to the district. This is because these areas have the highest footfall, are likely to see substantially increased footfall, road safety is currently poor and they have not undergone any significant investment in their public realm for many years. Moreover, investment in the public realm of Oxford Street and gateways benefits the highest number of people, therefore the return on investment is greatest. Consequently, Oxford Street and its gateways should be the only 'Priority 1' schemes in the final delivery plan.
164. The business community would welcome assurance that contractors have the capacity and capability to deliver the construction phases on time, to a high standard, with minimal disruption to businesses and safe operation of streets.

### **Place-management**

165. International Centre status in the draft City Plan recognises the significance of the district, however, this needs to be matched with an appropriate level of resource in policing and place management.
166. The Oxford Street district has a greater GVA than the City of London and also is a comparable target for crime and terrorist attack. It also has considerably more visitors. However, the resources allocated to policing are considerably lower than the City and other comparable locations. The City of London has 735 officers, of which 305 are uniformed police officers, while the Oxford Street district has only 68 Borough Command Officers.
167. To achieve a reduction in anti-social and nuisance behaviours we encourage consideration of a Public Space Protection Order for the International Centre. This potentially could outlaw behaviours such as unlicensed to bring organised begging into the district, aggressive street trading and donating to street begging (instead we recommend and support the introduction of payment points for people to contribute towards reducing homelessness and rough sleeping – [www.taplondon.org](http://www.taplondon.org))
168. Future utility street works should be minimised by bringing forward and coordinating repairs and replacement work as part of the proposed public realm works to the Oxford street district.
169. Street cleansing requires a step change in its strategic planning and delivery. We suggest a four-pillar strategy:

- i. Routine cleansing services – the frequency of routine cleansing and waste and recycling is insufficient for the intense activity and scale of the challenge in the Oxford Street district. Street cleansing should be coordinated with chewing gum removal (otherwise chewing gum is cleansed and not removed). Moreover, a street by street review of hours of cleansing should take place, so areas without residences can be cleaned at alternative times of the day and the existing cleansing vehicles can be used more intensively through the day and every day of the week.
  - ii. Reactive cleansing services – to back up better routine services, additional resources need to be allocated to dedicated response and reactive services, to ensure cleansing problems are resolved on the same day and before they are exacerbated. This should be backed up with information campaigns to ensure everyone who works or lives in the Oxford Street district knows where to report litter, spillages and graffiti.
  - iii. Rapid reporting and Enforcement – additional resources allocated to enforcement of breaches and publicising breaches to deter future similar behaviours.
  - iv. Pride and shared responsibility – launch of a ‘Pride in the West End’ trade mark campaign, in which businesses, community groups and other organisations take informal responsibility for additional litter picking and washing small parts of the highway, such as frontages.
170. The step-change in street cleansing should be spearheaded by a new private sector lead Oxford Street Task Force, drawing on the operator and property owner expertise in street management across the district, to develop and deliver a new plan.
171. Oxford Street is blighted by the high number and poorly located street trading kiosks. These remove much needed footway space, obstruct way-finding and exploration of the wider district. Moreover, many are located at junctions with a high collision record, therefore could be an obstructing space for pedestrians and sight-lines and contributing to the likelihood of collisions.
172. We recognise that carefully located and curated street trading can add to the vibrancy and experience of shopping. For everyone’s benefit, we encourage a significant thinning of street traders, relocation of a remaining few to safer and more appropriate locations, curation and enforcement of goods that are sold and cross-agency work to ensure traders are complying with all HMRC and trading standards requirements.
173. Finally, on place management, the extent to which Oxford Street could be a terrorist target needs to be carefully considered and designed out as part of this project. Westminster City Council should develop a HVM strategy with a clear definition of the threat potential, attack methods and the most appropriate mitigation techniques. These should seek to blend in with the public realm and be unobtrusive. WCC should

consult with the Police, BIDs, businesses and wider partners in the design of this strategy.

174. We are encouraged that conversations with ourselves have taken place on the development of a lighting strategy for the public realm, which considers adequate illuminance levels, uniformity, low light pollution and the use of vandal resistant materials. Lighting needs to be designed with public realm CCTV systems in mind.
175. We encourage consideration of a borough-wide CCTV strategy. CCTV is most effective when combined with good lighting and designed to counter a set of offences, and supported by management, continuous monitoring and adequate response. WCC and the MPS should write an Operational Requirement Document, setting out the parameters for CCTV operation, the standard of recording, monitoring and response, as well as image quality, system access, maintenance and management. Careful design of the public realm is needed to avoid CCTV blind-spots.
176. WCC should consider design techniques which enhance the demarcation of territory and the idea of 'defensible space'. This includes changes in paving, surface texture/colour, landscaping, planting and signage. Landscaping can be used to make places safer as well as more attractive, provided it does not restrict natural surveillance.
177. WCC need to work with partners to outline the financial and administrative commitments that will be required to keep all measures effective and functional into the long term.

## **Funding**

178. We recognise that the ambition to deliver construction projects across over eighty streets will be costly and we welcome the WCC commitment of £150m of new investment over three years.
179. We encourage the Mayor of London to support the proposals for traffic-free gateways to Oxford Street, including developing, funding and constructing a Great Space for People at Marble Arch, which is the only road in the district with direct Mayoral responsibility.
180. The business community offers its experience to WCC to support exploration of fund-raising opportunities, including central government, rates retention, the High Streets Fund and other sources.
181. Revenue funding for a high standard of street management, including visible security presence, frequent cleansing, regular waste collection and footway repairs is likely to require exploration of new approaches. We welcome the opportunity to explore these with partners and stakeholders.

## Conclusions

We welcome:

- the Place-shaping strategy proposals, which are district-wide and end-to-end and would like to see them delivered in their full entirety and;
- the £150m of new funding, which is additional to the borough's routine maintenance, LIP, Section 106 and CIL funding.

In summary our position is:

- i. The prioritisation needs to be more fine grain, based on a clear criteria and with fewer Priority One streets, limited to Oxford Street and the gateways alone, not least of all to protect the 50,000 jobs.
- ii. The Priority One streets should be fully constructed in time for the full operation of the Elizabeth Line (Reading and Heathrow to Abbey Wood and Shenfield).
- iii. Creation of a West End of traffic-free gateways, including Oxford Circus, and timed and traffic restricted access spaces on Oxford Street is essential for the scheme to have an impact.
- iv. The proposals for Marble Arch could be even more ambitious, creating a world-class traffic-free 'Great Space', with the gyratory removed and traffic lanes rationalised.
- v. Oxford Street should be reduced to two bus services, with other services terminating before reaching Oxford Street and general traffic managed and reduced across the wider district.
- vi. Restricted access to Oxford Street for taxis and other traffic; and alternative high quality routes for cyclists should form a key strand of the proposals.
- vii. Street trading kiosks should be significantly reduced as a priority.
- viii. Freight, waste, recycling and deliveries preferred supplier requires a single district-wide approach.
- ix. Planning and licensing regulations need to support retail as well as enable flexible and changing leisure uses to support the economy, in particular the evening and night time economy.
- x. The district should be managed as a distinctive area, with a well-resourced, robust and strongly enforced management plan, rather than as an extension to WCC's street management services which should commence before, rather than wait until completion of the new public realm. Private sector property owners and managing agents offer to assist in a time-limited Street Management Task Force to oversee its development.

The business community will work with residents, Westminster City Council and other agencies to ensure these ambitious proposals are delivered as soon as possible and to benefit all stakeholders.