



OXFORD STREET DISTRICT CONSULTATION FOR THE DRAFT PLACE STRATEGY AND DELIVERY PLAN

12 December 2018

The Bloomsbury Association wishes to make the following comments on proposals to improve the future of the Oxford Street District as described in the City of Westminster's consultation documents. Most of these comments were made in person to members of the project team at various events during and prior to the consultation period, including Westminster's presentation at New London Architecture on 12 December, which the Association attended.

The Association's area of interest is bounded by Tottenham Court Road to the west and New Oxford Street to the south. This is the edge of Bloomsbury at a point where it collides abruptly and noisily with the fringes of the West End. It partly falls within Oxford Street District and Character Area I, the eastern gateway to Oxford Street. The Association may also take an interest in proposals of wider impact such as this, located outside their area, and comments on proposals with a view to promoting high standards of planning, urban design and architecture and to securing the preservation and enhancement of the particular character of Bloomsbury.

The West End Community Network, of which the Bloomsbury Association is a member, has submitted a separate response to the wider, strategic issues raised by the proposals for the District, which the Association endorses. Each member organisation is also providing their own feedback based on the impacts on their areas of interest and the public realm interventions that are proposed. These follow.

1 Generally

1.1 The Association supports good quality urban design that will enhance The West End's streetscape. We recognise that the *Place Strategy* is very much aspirational but welcome the proposed interventions in principle.

1.2 We are pleased that Oxford Street is being considered with its immediate hinterland and implemented as a whole. Also that it is informed by an understanding of the characteristics of peopled space with urban design rather than transport ambitions. The holistic approach is welcomed.

Jane Jacobs in her seminal work *The Death and Life of Great American Cities*, stopped the plan-making professions in their tracks in 1961 when she commented: "*There is no logic that can be superimposed on the city; people make it, and it is to them, not buildings, that we must fit our plans.*" Real places have to be owned by the public and made by the public, not by highway engineers and transport strategies.

1.3 There are still concerns that the proposal fails to reduce the amount of through traffic blighting the eastern part of the District, and the suggestion to divert buses around Oxford Circus and through side streets seem an unwelcome leftover from the previous transport driven strategy.

1.4 The *Place Strategy* needs to be cognisant of the needs of the residential and business communities living close to Oxford Street including Bloomsbury. Previous comments by the Association noted they could bear the brunt of any increase in displaced traffic, particularly servicing vehicles and taxis. That is still a worry.

Like any community, it also includes people who are frail, elderly or disabled along with people who may be carrying luggage, heavy shopping or with prams. They use buses more than taxis and use Oxford Street to get from one end to the other to do their shopping. This proposal envisages a reduction in the number of buses serving the whole length of the street, which is a concern. Is an electric shuttle bus service linking St Giles Circus to Marble Arch a possibility to be considered that might, subject to resolving issues to do with terminating stands and interchange, complement other bus services?

- 1.5 We remain to be convinced that the proposal takes full account of the West End Project's plans for two-way traffic on Tottenham Court Road and Gower Street. Equally we are unconvinced that the West End Project can take into account this proposal. Encouraging words have been exchanged across the borough boundary between respective Councilors in the West End and Bloomsbury Wards and there appears to have been some officer liaison but, as yet, there is little evidence on the ground to indicate the potential for seamless integration. Indeed, now it is being implemented, there is an understandable reluctance to make any changes to the West End Project to reflect more recent developments.
- 1.6 There are errors in the existing *Public Realm Projects Plan* to the east of the District. We would be happy to meet and advise.
- 1.7 There are errors in the *Land Use Plans* to the east of the District used for the evidence base. We would be happy to meet and advise.
- 1.8 There are errors in the *Ground Level Retail Plan* to the east of the District used for the evidence base. Again, we would be happy to meet and advise.

2 District approach: Character Area I

- 2.1 Hanway Street and Hanway Place should both be included in Character Area I. Arguably, Denmark Street will become a sub-part of St Giles Circus on completion of Consolidated's development and this should also be included.
- 2.2 The *Routes And Connections Plan* used for the evidence base should include the important and historic link between Great Russell Street and Oxford Street via Hanway Street. It should also recognise the importance of Sutton Row and Soho Street in providing an alternative southern link between St Giles Circus and Oxford Street. Both routes, north and south, will be vitally important in relieving inherent pedestrian capacity limitations on the narrow footways at the far eastern end of Oxford Street once the Elizabeth Line opens.
- 2.3 Bedford Avenue, Bayley Street and Montague Place are also important connections to the Oxford Street District; Adeline Place and Bloomsbury Street are not.
- 2.4 Consideration also needs to be given to the implications of possible surface access to Crossrail 2 at Tottenham Court Road station. We are aware of possible locations being considered, including at each end of Hanway Street.
- 2.5 The lighting element of the *Place Strategy* should acknowledge lit artwork on the southern façade to One Bedford Avenue along with what we understand to be an 'urban gallery' display proposed as part of Consolidated's St Giles Circus development currently under construction.

The project team should be aware that there are substantial development pressures from advertising interests to transform the place character of St Giles Circus into another Piccadilly Circus with large-scale digital display screens, which the Association feels would be inappropriate at the eastern gateway to Oxford Street. Such a display has already been installed on the Tottenham Court Road elevation of the St Giles Hotel without planning permission being sought.

- 2.6 We support the ambition in the Delivery Plan to improve public space on Hanway Street and Hanway Place, to make them more pedestrian friendly with the potential to provide a better connection to Tottenham Court Road and the British Museum. This has long been spoken of and has been suggested in previous 'masterplan' proposals for Oxford Street but never realised.

Hanway Street is acknowledged to be in dire need of a 'transformation' to restore the character that has been lost. As on Soho Street, pedestrian use should be prioritised during the day. The

street should not be a rat-run for taxis and lorries seeking to avoid congestion on New Oxford Street by congesting Great Russell Street instead. It can be much more than a lorry park or Sunday staff car park for Primark. It offers an enormous opportunity to provide more dwell space for pedestrians that is currently unavailable on the northern side of Oxford Street where it meets Tottenham Court Road. It is not a street to be ignored just because it is divided by a borough boundary.

The opportunity was clearly evident when the urban block between Oxford Street and Hanway Street was recently redeveloped to provide additional retail, office and residential uses together with an extension to Primark, but was ignored. In the process, valuable heritage assets featured in the Conservation Area Appraisal were destroyed, not safeguarded by Westminster. It is time to grasp the opportunity to repair the damage done to this unique streetscape through years of public and private sector neglect.

We concur with the '*Priority 1*' allocation for the reasons given in 2.2 above. It needs to be implemented before it is too late. Indeed, mindful of the risk to pedestrian safety by allowing the rat-run to continue, it might also be necessary as part of the immediate public safety works to be implemented before the Elizabeth Line opens.

- 2.7 Along with better wayfinding, the pedestrian crossing over Tottenham Court Road, linking Hanway Street to Great Russell Street and the crossing over Oxford Street to Soho Street, could both be better designed to encourage this link – simple measures to release great potential.
- 2.8 The project team should nevertheless be aware that the Hanways along with Bainbridge Street, Bucknall Street, Dyott Street and other streets around St Giles Circus remain one of the foremost street markets for Class A drugs in Central London – the other retail activity for which the trash end of Oxford Street is renowned. There are various reasons for this: the borough boundary is one, blight consequent on indecision on Crossrail is another, along with a streetscape and 'inactive' building frontages that encourage drug-related crime and anti-social behaviour. Police advise this may become worse with the opening of the Elizabeth Line yet it is an issue that is not addressed in the *Place Strategy* and should be.

Some recent attempts have been made through the planning process to activate newly created frontages on Hanway Street and Hanway Place but what might have been a requirement appears to have been ignored and not enforced. Hanway Street would benefit from a direct public entrance into Primark and also from artwork being integrated into its delivery bay, as we understand was originally intended.

- 2.9 We support the continuation of Hanway Street's long-standing role as an important location for 'nightlife', but people live there too. Late-night uses need to be to a scale and intensity that respect its fragile residential community, that encourages street activity but discourages drug-related anti-social behaviour.

If it would be helpful in advancing the design proposals, we would be happy to meet with the project team and their consultants to elaborate further on these points.

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On behalf of the Bloomsbury Association

Copies to:
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