



Place Strategy for Oxford Street District

The Soho Society Response - December 2018

1. Broad comments and the vision

We welcome WCC's Place Strategy for the future of the Oxford Street District. It is more considered than the previous TfL/WCC document and pays more attention to the areas surrounding Oxford Street, reflected in its title of 'Oxford Street **District**'. We welcome this geographic broadening, although we are concerned that the term 'District' might risk encouraging thoughts about uniformity across the 'District'.

Oxford Street is bounded by four very different 'villages' which not only have little in common with Oxford Street, but little in common with each other. This very variety is a significant attraction for Oxford Street itself and must be retained - not only for the sake of the 'villages' themselves, but also because their differences benefit Oxford Street. The Strategy should recognise this more explicitly in its future development – and there should be no changes which might extend the Oxford Street ethos into the surrounding areas.

Having said that, we support the overall direction and the tone of the Strategy, although we think it would benefit from a clearer statement of vision and more coherence, more ambition and a slightly better balance. We explain what we mean by these terms below; the remaining sections of this note take the Strategy as the starting point and seek to add the missing coherence, ambition and balance.

We welcome the document being a 'Place Strategy', but we think it is a little light on **coherence** in the sense of the underlying policy 'glue' needed to make it happen. Capital expenditure on physical plans alone will not be sufficient; the strategy also needs 'joined up' policies to underpin it. There are two main weaknesses. First, there are almost no proposals to develop, and implement, pro-active, but variable planning and licensing policies specifically designed to support actions in the District. Second, insufficient emphasis or detail is given about the serious, and on-going, operational enforcement requirements that will be needed to make the strategy a success.

We also think the Strategy would benefit from more **ambition**. This is a once in a lifetime opportunity to develop the future of a very special District: it should be grasped with imagination. There should be bold proposals on traffic, on pollution, on pedestrian priorities and on small businesses; in many cases, the Strategy is rather timid. For example, the proposal on air pollution 'to promote the adoption of higher standards', is timid – a better Strategy would be to set a date by which zero emissions would be required across the District. Similarly, the statement of intent to 'ensure there is no displacement of traffic' is weak in the absence of proposals for how to achieve it.

The Strategy also seems a little **unbalanced** - in three ways. There is still an emphasis on Oxford Street itself (and its traffic) with more limited proposals for the rest of the District. Many of the smaller, often rather interesting side streets, have validity and a potential in their own right and should form more of a strategy to enhance the whole area. Second, the Strategy pays more attention to the western parts of the District than to the eastern parts; and to set the boundary right at the top of Soho excludes parts of Soho likely to be important to the future of the eastern end of Oxford Street. Third, while the needs and future concerns of the retail sector are rightly stressed, this is not balanced with proposals about the 80% or so of employment that is not in retail, especially if these other sectors and business clusters are to be encouraged and supported.

The *starting point* for any Strategy should be a **statement of vision** that is simple, clear, strong and holistic; we suggest:

Oxford Street District will be enhanced to become a pleasant, interesting and exciting place to visit, work and live; it will celebrate not just the Street's iconic role as an international centre for shopping, but also the diverse variety of 'villages' around it so that the whole area feels very special in ways that are uniquely London in character and unique within London.

To achieve such a vision, **all stakeholders** will need to play their part, not just WCC. Other stakeholders should not just look for benefits for themselves but should recognise their duties to be *contributors* to this future, helping to improve the shape and ambience of the District in terms of its high standards, its variety - and its history. 'Stakeholders' include not only the public agencies and the residents, but also commercial landlords, tenants, shopkeepers, drivers and visitors. Some of these stakeholders will need more encouragement than others to make their contribution – some may even need to have requirements laid upon them, for which WCC may need new legal powers.

Our response to WCC's Place Strategy unpacks this vision, focusing on points not covered adequately in the Strategy; we have not repeated points that are. The following sections set out the components, based on the principles of the Strategy:

- The environment
- The retail sector
- Traffic, vehicles and roads
- Provision for people

A final section is on operations and management, with an Action summary in an Annex.

2. The environment

1. Public space

The success of the vision requires major changes to public spaces, especially the streets. The Strategy rightly explains the need for high quality design and materials to bring beauty and elegance to public spaces, as well as themes to provide coherence. We welcome this. Further, a high quality appearance also helps to discourage anti-social behaviour (“ASB”).

The **cleanliness** of the streets is critical too. A major problem in the District, perhaps more on the side streets, are the **piles of rubbish and bags of waste** food that frequently block narrow pavements while waiting collection. These create a paradise for rats and diseases but unpleasant sights and smells for everyone else – as well as having to walk round the rubbish onto the road. All future developments should be required to provide space for waste, not only for their own needs, but sufficient to enable smaller premises to use it too (with technology to discourage unauthorised use and to levy charges).

For existing premises, no **commercial waste** should be left in bags on any street at any time - with active monitoring and enforcement. Retail and catering stakeholders would here be ‘playing their part’ for the District. For example, larger bins might be set at defined places, perhaps shared between outlets, which all premises were required to use. Another possibility would be to use monitoring to identify collection service that left its rubbish on pavements for more than, say 30 minutes, with consequential large fines. WCC should also use its powers more effectively to prosecute and fine those placing waste outside the designated times and/or places – perhaps also making more use of CCTV. In addition, the numbers of large waste trucks should be reduced, for example with only one or two consolidated collection services operating, perhaps through competitively awarded contracts: if deliveries can be consolidated, so can waste collection. All options should be explored to address this problem – or the vision will fail.

Trees can make a major difference to the appearance of the District, yet the Strategy seems unduly restrained in its proposals. On Oxford Street, it looks as if trees are proposed only for the west part, whereas they could go down its whole length. Smaller trees could also go down many of the side streets – easier still if more had pedestrian priority (see 5.2). In cases where tree roots might damage underground services, smaller tree species that thrive in large pots could be used to achieve the same effect. To keep their appearance and health, trees require on-going spending on maintenance.

2.2 Historic and heritage buildings

The many historic and heritage buildings help make the District uniquely London - as well as unique within London. Whether 'listed' or not, their grandeur and attractiveness should be protected, not only by planning decisions but also by those who currently own or rent them – 'playing their part'. It should at least be expected, perhaps required, that the aesthetics of buildings are not diminished by garish or tasteless use of neon signs, advertisements or lighting. The proposed revision to the 'Frontage Guide' should set this out by including guidance on the physical appearance of buildings. To enforce the Guide will require regular surveillance. The reference in the Strategy to 'animated facades at corners' sounds worryingly inappropriate and, unless done tastefully, should be dropped.

3. Air, noise and light pollution

The less tangible aspects of the environment can be as important as tangible ones. **Air pollution** has had most coverage, not least for health reasons. The proposal to reduce the number of bus routes on Oxford Street may help (though introduction of electric vehicles would help more). The proposal to raise emission standards (and the Marylebone Low Emissions area) also help. But the Strategy should be bolder and set a date (we suggest 2025) by which the *only* vehicles allowed into the *whole* District would need to have zero emissions. Enforcement would be with number plate recognition, such as is used for the Congestion Charge. There may need to be (a few) temporary exceptions for residents' cars, for some essential public service vehicles and for certain types of goods vehicles which may not be suitably powered for some years.

Noise pollution is getting worse, not least from pedicabs, but also as more and more retail and catering establishments are 'broadcasting' music to passers-by – a self-reinforcing problem as each tries to out-do the next; this tends to afflict side streets as much as Oxford Street. Loud noises from pubs and clubs with late opening hours can also be a nuisance. WCC should set a noise reduction target for the District, with stronger license conditions to prevent loud noises emanating from any establishment (clubs, pubs, catering and retail). But the real challenge is enforcement: more effective reporting tools for the public would help, but better still would be for license conditions to require all such premises to install noise measuring and recording devices which could be read, either in real time and/or on the basis of a complaint.

Light pollution is worsening too, with ever brighter lights. The heritage of many buildings is easily spoiled at night by light spilling from excessively bright shop fronts. Planning and licensing conditions should require lighting to be tasteful, with the revised 'Frontage Guide' setting out what this means – again this will need regular surveillance. A

lighting strategy for the District should be in the 'Frontage guide', including a requirement to turn off bright shop lights in residential streets after closing time.

3. Retail and its future

The retail and catering sectors are evolving rapidly and in unpredictable ways. If Oxford Street is to keep its pre-eminent and unique position as a shopping centre, it must offer something more than the standard anodyne string of national and international chain outlets – but also without small scruffy outlets. Every outlet should project a feeling and an appearance of high standards and quality – recognising that quality does not necessarily imply high prices (see, for example, the side streets in Florence).

1. Small, iconic shops and restaurants

Both in retail and in catering, it is vital to retain a **variety of outlets** across the District which are distinct, iconic and interestingly different. Small, independent outlets can be the life blood of side streets - such places are the essence of Soho, for example. In addition, the very existence of something so different yet so close to Oxford Street is a bonus for Oxford Street too. Everything must be done to reinforce this specialness.

Thriving side streets with a range of interesting small shops, enjoyable small restaurants and cafes and green sitting out areas, all help give the District a truly distinct London feeling. This would be helped by well connected walkways and pedestrian priorities. Side streets that are very different from Oxford Street make the area critically different from other shopping hubs, perhaps even its USP. The Strategy notes 'unwelcome changes' in Soho, mainly the loss of smaller shops and restaurants; the support for distinctive small businesses proposed as part of the new Soho Special Policy Area should be a first step in reversing this. But it will also need WCC actively to use its planning and licensing regimes in ways that actively encourage small and independent businesses.

In addition, building on changes in the last Budget for small retailers, there should be more local determined flexibility in setting rates for small businesses. This cannot be done sensitively at national level and is precisely the sort of role for which there is *local* government: WCC needs powers to adjust business rates, at least for small businesses. How much of the revenue WCC should retain is a separate issue.

In addition to business rates, there are recent examples of small shops and businesses being squeezed out by landlords interested only in their profits, without concern about what this does to the neighbourhood. The vision requires 'all stakeholders to play their

part', but some clearly some do not: 'naming and shaming' can help, but only if the named actually have any shame! The whole rent review process seems to leave a lot of scope for manipulation, not least against smaller businesses; there should be a national review of this. A quicker option, as used in Paris, would be for WCC to be given some locus in any increases in commercial rent levels for SMEs, perhaps linking rises to turnover and/or the extent to which the business was truly 'local'; it would not be unreasonable to lobby for such powers.

2. Larger retailers

Larger retailers on Oxford Street have problems too. The Strategy recognises they need more flexibility in the use of their premises, as does the draft City Plan, not least as part of an **evening economy**. This is fine, but account must always be taken of residents' need for quiet at night, say, generally after 11pm; this should be reflected in active planning limits on numbers and on licensing conditions, particularly for alcohol related premises or activities. A free-for-all in an evening economy is likely to lead to squalid outcomes.

3. Cultural programmes

Cultural programmes mentioned in the Strategy seem to be interpreted rather narrowly as 'events'. A wider **Culture and Leisure Strategy** is needed, including an evening (but not night) economy and with more flexibility for retail outlets. To ensure quality, its implementation will need to be planned: a laissez faire approach may well result in a preponderance of noisy clubs and bars. A culture strategy should include links to 'theatre-land', to the adjacent, and undoubtedly 'special' Chinatown, and to the globally unique, British Museum. Each of these undoubtedly adds to the attraction of Oxford Street.

4. Other employment

The Strategy, and the City Plan, note that almost 80% of employment in the District is NOT in retail or catering, but no implications are drawn about this. The other sectors often operate in clusters in small, independent businesses (for example, in creative industries, in film work, music, IT, games development, fashion, tailoring, and medical related services). These small businesses are also threatened by rising rents and business rates and would benefit from more 'community oriented' behaviour than is often manifested by some landlords. Simply to *encourage* 'better' behaviour is unlikely to be enough in many cases. WCC should have active planning and licensing policies which positively favour and encourage smaller businesses which have a positive impact because of their historical connection or specialist nature. This is also a further reason for WCC to lobby for new powers to set business rates for small businesses and to have a role in the review process for raising commercial rent levels.

4. Traffic, vehicles and roads

4.1. Traffic

The (welcome) aspiration to reduce traffic on Oxford Street without displacement to surrounding streets seems somewhat disingenuous without proposals for how this is to be done. It requires specific and bold proposals; we suggest two: first, that after a defined date, say in 2025, only vehicles with zero emissions will be allowed anywhere in the District; second, by the same date, all general on-street parking will have been removed (contrary to proposals in the draft City Plan). With both commitments, there would need to be some temporary exceptions made for residents and essential service vehicles. The critical point is to **set a date**. Traffic flows expected under this scenario should be mapped.

4.2. Bus routes

To limit Oxford Street to four bus routes would clearly reduce traffic and help reduce pollution - although we are more attracted by frequent, electric shuttle buses, with turn rounds and links to other routes at each end of Oxford Street. The Mayor should be urged to bring in low emission buses very quickly and all-electric ones by the same date in 2025; perhaps single-decker buses for Oxford Street might enable this to be achieved sooner. Narrowing Oxford Street to one lane each way and eliminating bus bays will increase space for pedestrians, but, at busy times, it could result in congestion building up behind buses at bus stops. This could be avoided if the timing of the lane reductions were done in tandem with a significant reduction in other traffic, for example by means of a much more rigorous emission regime, perhaps prior to the full zero emission date of 2025. Alternatively, bus bays may have to be retained.

4.3. Road closures

The proposed closure of the east and west sides of Oxford Circus could risk congestion in the 'side streets' used for the resulting diversions. Again this may be best addressed by coordinated timing in that, if the re-routing were done at the same time as overall traffic was drastically reduced in the District (see above), the resulting 'diverted' traffic would mainly be the four bus routes, which might not be too disruptive. These schemes should not proceed until there is confidence based on evidence that they will not force traffic and pollution into residential areas either side of Oxford Street.

4.4. Deliveries and waste collection

Further consolidation of deliveries would be welcome, but tighter timings to control them are also needed, for example to between 7.00 and 11.00 and between 20.00 and 22.00. A maximum size for delivery vehicles should be set soon as the larger ones damage pavements; as soon as practical, zero emissions should be required for them too. The

arrangements for waste collection should be consolidated (as has been successful in Bond Street), for example via franchising, and operated within the same defined time periods. As set out in Section 2.1, no commercial waste should be left festering on the street.

4.5. Pedicabs

Pedicabs are a nuisance to traffic, to pedestrians and to residents; some are also involved in criminal activities. They need regulating and licensing; a more effective campaign for legislation is required. Effective regulations should be able to put a stop to their criminal activities, make them safer and stop them playing loud music.

5. Provision for people

5.1. Congestion

Pedestrian congestion has been one of the concerns driving the Strategy; the widening of the pavements should help. But we are not totally convinced about the forecasts for significant increases in passengers arriving in the District by Cross Rail as, by the accounts given, the estimates seem to be based more on gross numbers than on net increases; further, numbers may be self-limiting in practice.

5.2. Pedestrian priorities in side streets

There are already a few small pedestrianised areas in the District; they are generally very successful; the Strategy proposes a few more. The draft City Plan also mentions an intention to prioritise the needs of pedestrians. There are many cities, in Britain and abroad, that give priority to pedestrians in parts of their centres, making them pleasant places to be, but without the concomitant ASB often feared – their experience of well supervised, high quality environments seem to be effective in reducing ASB.

We think there is scope for setting more pedestrian priorities in the District, for example, with timed traffic closure periods in some of the small streets on either side of Oxford Street which, as long as they were kept distinctly different, would add more ‘specialness’ to the Oxford Street experience - and to the ambience of the whole District. This should be investigated and perhaps trialled. Similarly, raising the street level in some small streets up to that of the pavement can mark out pedestrian priority without closing the road to traffic; again this should be trialled.

5.3. Residents

The Strategy - and the draft City Plan - make references to needs of residents. It is welcome that more attention will be paid to their needs in future. People who choose to

live in the District expect it to be bustling, but there are limits, particularly on noise, which it is reasonable to expect other stakeholders to observe. WCC planning and licensing policies should continue to take explicit account of the needs of residents for quiet at night, but any limits are of little use unless they are proactively and strongly enforced, for example with noise recording and monitoring devices in all licensed premises.

5.4. Crime and anti-social behaviour

Unfortunately, there are individuals attracted to the District for criminal and/or **anti-social purposes** (e.g. drug dealing, drug taking, robbery, assaults, theft, begging, drunken behaviour, rough sleeping). Many such people need help, but meanwhile they detract from the pleasant experience of others. Both carrots and sticks are needed to reduce the problems and/or to remove them entirely. Helping individuals is a long, slow process, well outside the remit of any Oxford Street District management, but current policies and practices to reduce the problems in the District have clearly not worked. New designs could try to ensure that they do not include spaces that facilitate such problems. But at least as important, it needs better monitoring and stronger, quicker enforcement if such anti-social behaviour is to be eliminated, or even reduced.

Equally unfortunately, 'anti-social behaviour' is not limited to individuals; some businesses too (mainly catering, but some retail) break their license conditions in anti-social ways such as allowing or creating excess noise or leaving their waste in the street. So there also needs to be effective monitoring and enforcement of 'good behaviour' by businesses as well as by individuals. Both require stronger powers that are quick acting, effective and operate on a 24/7 basis – and may require changes to legislation.

6. Operational arrangements

6.1. Management tasks

To ensure that the plans for the District work effectively will be a significant task – and an on-going one. Enforcement mechanisms will need to be rigorous, fairly unobtrusive and operate 24/7. They will need to ensure that all 'stakeholders' (in its broad sense) do indeed play their part in securing the vision. In operational terms, the Strategy mentions a **Community Force**, which, to be effective, will need a wide range of strong and quick acting **enforcement powers**. At the least, these should cover: traffic movements and number plate recognition, breaches of licenses and other planning conditions, all forms of excess noise from premises and from individuals, encroachment of businesses onto public space, dumping of waste and rubbish, and various forms of individual ASB and criminal behaviour. This will need a strong, uniformed **on-street presence** - in significant numbers.

No one agency currently has all these responsibilities; the Strategy refers to coordination through ‘joined up partnerships’. It will need more than that: some powers will need to be delegated from constituent agencies (including from the Police) and some powers will need to be new (for example on rough sleeping). If police powers cannot be delegated, then there will need to be extra funding for police officers to be on the beat in the District. It may require legislation to establish such a Community Force, which would need to be a fully accountable public body (*not* contracted out).

Agreements will also be needed about which agency is responsible for which parts of the plans and for which aspects of the management and enforcement. Prior agreement will also be needed on how coordination will be achieved and on the proposed fall-back arrangements if any one body fails to meet its responsibilities.

6.2. Plans, budgets and timetables

Almost all the above needs long term plans and budgets by the relevant agencies, with implementation timetables that are consistent across the agencies. This will be no mean task – but no plans can be considered final unless and until budgets are set and agreed by all. We are pleased to note that, as a start, WCC has set a budget of £150m over three years and is seeking further funds from the Mayor and TfL. It is not clear how much of this £150m is for one-off capital costs and how much for the equally critical on-going management costs – which should be estimated and provided for. The Strategy refers to the need to ‘collectively secure additional funding’ for the management tasks, although it would be better if it had set out how this might be done.

There should be also be a clear policy for how the private sector, in particular, land and property owners and long leaseholders, will be expected to contribute to the ongoing management and maintenance of their streets and the District - which will help to maintain the value of their assets.

For a vision as ambitious as this, plans, budgets and timetables, for the main actions and for the coordination, should be for 10 years: it is only forward budgets that make plans real. Publicly visible plans also add credibility to the vision for those stakeholders who, at present, are only interested observers.

7. In conclusion

There needs to be ‘Supplementary Planning Guidance’ to achieve this vision. This should set out and align District-wide special policies on planning, on licensing and on strong and rigorous enforcement, coupled with clear targets for higher standards for the District for air quality and emissions, the public realm, rates for small businesses, pedestrian

priorities, waste disposal, lighting and noise. There also needs to be a 'Culture and leisure strategy' that is not dependent on the consumption of alcohol. The traffic proposals should be strengthened by setting a clear timeline for the linked actions on re-routing, lane narrowing, road closures and emission standards.

All the above must be underpinned by clear powers and delegation, coordination and real long term budgets. The framework for the next step should include recognition of the wider vision, its implications and the omissions we have outlined above. To summarise our proposals as actions, we provide a set of Action Points in the Annex below.

The suggestions in this submission are intended to add to WCC's Place Strategy to produce a coherent and exciting set of proposals for one of the most iconic Districts in London. They would make a special District even more special. Without this added coherence, ambition and balance, the result could be a bit of a mess.

The Soho Society; 14 December 2018

Annex: Summary of Action Points (not all for WCC)

1. From a set date (we suggest 2025), allow only zero emission vehicles anywhere in the District, monitored with number plate recognition; by the same date, remove all general on-street parking. There may need to be a few temporary exceptions. (2.3; 4.1)
2. Arrange pedestrian priority in many of the side streets to add to the ambience and coherence of the District; this might be done with timed pedestrianisation and/or with raised carriageways – maybe starting with pilot trials. (5.2)
3. Plant trees down the full length of Oxford Street and (smaller) trees down many of the side streets – in pots if necessary; arrange for their planned maintenance. (2.1)
4. Expect, or even require, owners and tenants to respect their buildings' heritage and aesthetics and revise the Frontage Guide to reflect this; this will need surveillance. Drop the idea of 'animated facades'. (2.2)
5. Develop and actively use planning and licensing regimes to encourage smaller, independent outlets and businesses, both to help job creation and to help provide a more distinct District experience. (3.1)
6. Seek legislative powers for WCC to limit business rates and to have a locus in the reviews of commercial rent rises for small retail, catering and other small businesses. (3.1; 3.4)
7. Lobby for a national review of the whole rent review process as it seems to leave too much scope for manipulation, not least against the interest of smaller businesses. (3.1)
8. Develop a 'Strategy for Culture and Leisure', including an evening economy not dependant on alcohol, along with plans for its implementation – and not a free-for-all. (3.3)
9. Require all retail and catering facilities not to put waste loose on the street for collection - they could use (shared) large bins; more effectively fine any outlet that puts its rubbish out at the wrong time or place; also fine any collection service that left rubbish too long (2.1)
10. Require the consolidation of waste collection (as for freight servicing), with all vehicles operating only between 7-11 am and 8-10 pm. (4.4)
11. From 2025, require all freight and waste vehicles to be zero emission and to be less than a set size. (4.4)
12. Require all future developments to provide sufficient space not only for their own waste, but also to enable nearby smaller premises to use it too. (2.1)
13. Set a noise reduction target for the District; enforce licensing conditions to curtail noise from retail and catering premises – as well as from clubs and pubs. (2.3; 3.2; 5.3)
14. Devise planning and licensing conditions to limit the levels of lighting that spill over from shop fronts, also require it to be tasteful; include this in the Frontage Guide. (2.3)
15. Timetable the reductions to the lanes of Oxford Street, and the re-routing of traffic round Oxford Circus, to be the same as the reductions in other traffic at point 1 above. (4.1; 4.3)

16. Lobby hard for powers to license and regulate pedicabs and then ensure that all pedicabs were fully law abiding, safe and silent. (4.5)
17. Establish better monitoring and stronger, quicker enforcement powers operating 24/7 to eliminate, or at least reduce, all anti-social behaviour by individuals; this may require changes to legislation. (5.4)
18. Set up effective monitoring and speedy enforcement arrangements to enforce 'good behaviour' by businesses by stopping any of their anti-social activities. (5.4)
19. Establish a public, uniformed, 'Community Force' with delegated, quick acting powers for **all** enforcement activities, with 24/7 presence on the streets; may require legislation. (6.1)
20. Agree which bodies are to be responsible and accountable for which aspects of the plans; agree the coordination arrangements and the fall back provision if any one body fails to meet its responsibilities. (6.1)
21. Develop and agree plans and timetables (for 10 years), by each of relevant bodies, especially for the management and enforcement tasks. (6.2)
22. Develop a clear policy for how the private sector (eg. land lords, land owners and long leaseholders), should contribute to the ongoing management and maintenance of the streets. (6.2)

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