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Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

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Dear Ms Borwick

Traffic congestion on Oxford Street, Regent Street and Bond Street

Thank you for your letter of 7 August 2009 inviting us to contribute to this consultation. London TravelWatch is the independent statutory consumer body representing the interests of transport users in and around London.

In principle, London TravelWatch very much supports public realm improvement. Walking is both an important mode of travel in its own right (pedestrian traffic, on Oxford Street on a weekday 08:00 to 22:00 is 138,000)¹ and an integral part of any public transport journey. Improvements in public spaces will encourage walking and improve passengers' experience of interchange between modes. We have no in-principle objection to the pedestrianisation of Oxford Street and recognise that in many respects it would offer a great environmental improvement for visitors and workers alike. We accept that doing nothing will mean that the local environment in Oxford Street and the surrounding area remains unpleasant.

However, buses play an essential part in meeting the access needs of Londoners – 167,000 passengers a day get on and off buses in Oxford Street². Buses are the only public transport network that is fully accessible. The accessibility of both National Rail and the Underground are improving, but will never be accessible to all in the way the bus network is. The debate we have noted in the press has been interesting, but has focussed simply on the undesirability of the presence of buses in Oxford Street, making the implicit assumption that removing them would have only limited impact on access. This we dispute. There has been no similar campaign for the removal of taxis from Oxford Street which would, arguably, be a lot easier to achieve and affect fewer people.

Westminster Council's Local Transport Plan³ notes:

Oxford Street suffers from congestion as a result of the high bus and taxi flows.

David Brown, M.D. TfL Surface Transport told the 10 March 2009 Assembly Transport Committee:

“Only 42% of all the movements in Oxford Street are actually by bus. Of the total capacity, 37% are taxis and there are parts of Oxford Street which do get taken up by private cars as well. The taxis are 37% but only carry 1% of all the passengers.

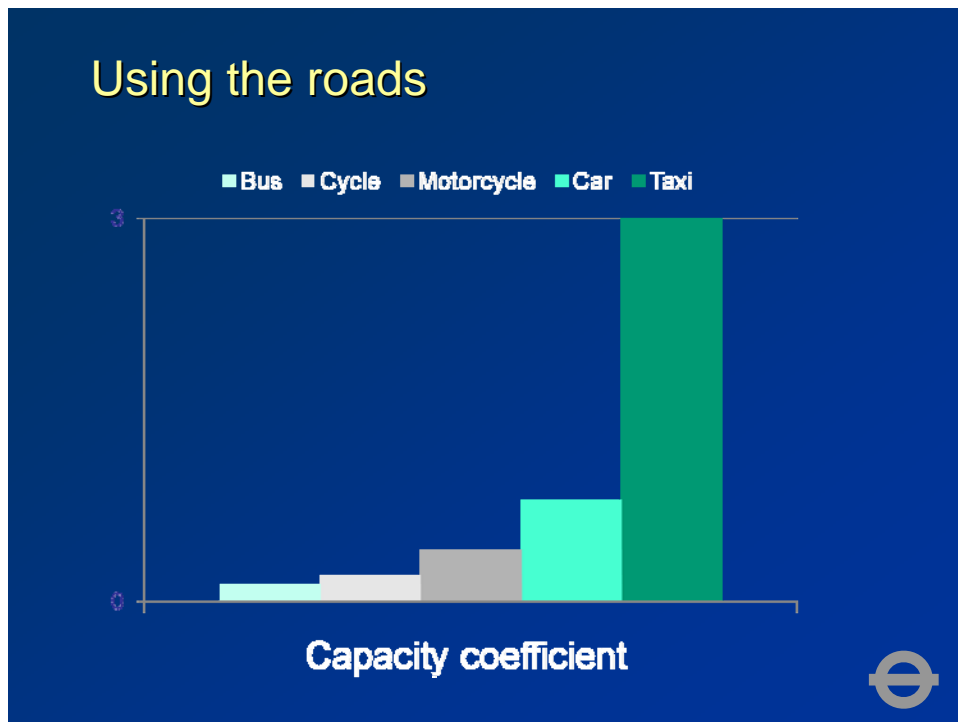
The TfL graph below⁴ illustrates the relative efficiency of the different modes in terms of their use of road capacity.

¹ Towards a fine City for People, Gehl Architects, 2004

² Westminster Council's ORB Action Plan

³ Published 2004 at: <http://www.westminster.gov.uk/services/transportandstreets/lip/>

⁴ Presentation to London TravelWatch Board: 'Managing Road Congestion in London', Alison Clark Head of Traffic Manager's Office



There is limited street space in central London generally, and in the vicinity of Oxford Street in particular. It cannot be increased without doing unacceptable damage to the urban fabric. So we believe the focus should be on how to make the best use of the space available. **Our overriding priority for Oxford Street and the surrounding area is to prioritise the bus and pedestrian.**

Turning to the questions

Q. 1 What impact is congestion in the area having? How does it affect the group(s) your organisation represents? Please provide figures and, or specific examples to illustrate if possible.

Congestion in the Oxford Street area clearly makes it a less pleasant working, shopping and travelling environment. All transport modes are delayed and frustrated. Bus services, in particular, are less reliable and will be more costly to operate due to the extension of journey time and variability in journey time.

To address journey time reliability problems in the 70s and 80s the transport authority implemented a policy of splitting historical routes that ran the length of Oxford Street. This would have had the effect of improving reliability, but at the expense of passenger journey opportunities. For example bus route 8 which went from Old Ford to Willesden was split in two: the existing 8 now connects Bow Garage with Oxford Circus, the 98 Holborn to Willesden. Many passengers will benefit from improved reliability, but those wishing to travel along Oxford Street will be frustrated by the additional interchange. Particularly pertinent to your study is the fact that now both the 8 and 98 travel along sections of Oxford Street lightly loaded as they are either at the beginning or the end of their journeys.

Q. 2 What is your organisations view of current plans to address congestion in the area? What benefits will the plans have and what issues still need to be addressed.

We know of five proposals to address congestion on Oxford Street.

i) The proposal by TfL to reduce the number of buses per hour travelling along Oxford Street by 10% in year one and a further 10% in year two.

We were not consulted regarding this proposal, though we have been consulted on the particular route changes. We understand that the proposal did not arise from TfL's usual bus planning processes that are based on simplicity and respond to demand.

The actual changes this year (reducing the capacity of bus route 23, shortening route 176, remodelling the C2 and 8) have been minor changes with minimal implications for passengers.

We understand the proposal to curtail route 113 will require 1200 passengers a day to interchange. Some of these passengers will be less mobile and some encumbered with shopping. The numbers are small, but this proposal imposes an interchange penalty on passengers which will make buses less attractive. We want them to be more attractive.

The 10% followed by 10% reduction proposal will clearly reduce the number of buses travelling along Oxford Street, however it misses the point: buses are, in part, a solution to central London's congestion problems, they are socially inclusive, improve access for business and are very space efficient. Making bus services less attractive to passengers, by shortening them or diverting them from passenger objectives will do little to address traffic congestion on Oxford Street, particularly if nothing is done to restrict other traffic, notably taxis, from simply filling up any released road space!⁵

You will know we are unconvinced regarding the reversion of articulated buses to double-deckers which will mean more buses on Oxford Street as the 25, 73 and 12 are converted.

ii) The ORB proposals and the Oxford Circus diagonal crossing.

We generally welcome these proposals to improve the pedestrian environment and bus stopping arrangements along Oxford Street, Regent Street and Bond Street, particularly the decluttering, Legible London wayfinding, remodelling of Oxford Circus junction and the creation of pleasant places off of the main thoroughfares for pedestrians to relax. All these proposals will improve the passenger and pedestrian experience of Oxford Street and the surrounding area.

However, apart from the remodelling of Oxford Circus junction, these proposals will be only relatively small scale interventions and their impact marginal. It is to be hoped that further similar proposals are planned for the future.

iii) The remodelling of central London bus services, terminating routes outside of the central area.

London's bus services have developed in response to passenger demand. Oxford Street and central London is a generator of demand and as such a huge number of bus services serve

⁵ Recent KPMG study, para 7.4.2

the area and its attractions. We do not understand why one would require passengers to change buses on the periphery of London if there is the demand for bus services to go further into central London. This proposal would introduce an interchange penalty for passengers thereby reducing the attractiveness of using the bus to access central London.

iv) The wholesale pedestrianisation of Oxford Street.

As we say above we have no in-principle objection to the pedestrianisation of Oxford Street, however, given the importance of the bus to central London and the passenger objectives along and via Oxford Street we would not support this at the present time and without substantial complementary measures to ensure bus passengers can reach their transport objectives. There would need to be both alternative bus routes for cross central London travel and some form of vehicular transport along Oxford Street for those with mobility problems.

If Oxford Street were to be pedestrianised there would be a need for large bus parking areas / interchanges in central London. It is difficult to think where such a facility could be situated.

v) Trams or trolley buses for Oxford Street

Trams and trolley buses are an attractive option where passenger numbers warrant. However, such a proposal would need to be part of an area wide scheme to reduce traffic in Oxford Street and the surrounding area. Simply running tram services to replace buses would not deal with the taxis, nor the volume of side road traffic. We would, however, welcome a feasibility study.

A tram or trolley bus shuttle service would need a depot which would be difficult to locate in central London.

Q. 3 Please describe your organisation's preferred option for addressing congestion?

As stated above we support the prioritisation of pedestrians and buses along Oxford Street and the surrounding area. We believe our proposal outlined below would go a long way to reducing the impact of motor vehicles on Oxford Street and enhancing the pedestrian experience without reducing access to Oxford Street. We would welcome further research to test these ideas.

Congestion on Oxford Street and the surrounding area is part of a wider picture of congestion in central London and beyond. London TravelWatch believes a mix of policies would address congestion on Oxford Street and the surrounding area. Focussing just on Oxford Street and the number of buses on Oxford Street is mistaken as buses are space efficient and the only public transport mode accessible to all. Buses are part of the solution to traffic congestion in Oxford Street and more widely. Simply reducing the number of buses on Oxford Street without other complementary measures to ensure that any released road space is not taken up by other traffic would be self defeating.

Our preferred mix of policies would be:

a) Prioritise the bus and pedestrian in Oxford Street and central London – close off side roads to Oxford Street.

The ORB proposals go some way to prioritise the pedestrian by improving already closed off side roads. However, buses and pedestrians have to continually stop at the numerous signalised junctions along Oxford Street. The closure of side roads and the creation of more 'oases' would greatly improve the pedestrian environment and walking experience, but also improve the operation of bus services and so reduce congestion on Oxford Street.

b) Restrict taxi access to Oxford Street

Whilst taxis are part of London's public transport network they are much less space efficient in their use of road space compared to the bus. Given the levels of congestion in Oxford Street we believe further restricting taxis would benefit access and be in the best interest of most travellers in central London. If taxis operated from ranks in the side streets off of Oxford Street and were well signed (perhaps as part of the Legible London wayfinding scheme) this may even be preferable to the present arrangement of hailing taxis on Oxford Street or finding one at the few ranks. Oxford Street's major attractions, the large department stores, all have side and rear entrances which taxis could be diverted to. For buses this is not possible.

c) Reducing the number of parallel bus movements on Oxford Street.

Re-linking cross-London bus routes (which were split in the 1970s/80s to reduce the disruptive effects of traffic congestion on bus performance) would be beneficial to passengers by increasing the number of through journeys that can be undertaken without interchange. This would relieve congestion on Oxford Street as fewer buses would be overlapping each other and terminating and standing in the area. It would also facilitate the closure of side roads as buses would no longer need to use them for standing.

However, it must be remembered that the shortening of bus routes was a response to poor reliability caused by traffic congestion. Implementing bus priority on a whole route basis can protect buses from congestion. We would welcome a programme of whole route bus priority generally, but particularly along re-linked cross London routes.

d) If the above proposals outlined in a) to c) were to be undertaken then there would, of course, be the need for complementary traffic management in central London and also an opportunity to investigate the re-planning of some of bus services that presently use Oxford Street so as to reduce their impact further. This would mean finding alternative cross London routes or convenient locations for buses to terminate.

Q.4 Why is this the preferred option? What essential features or outcomes does it deliver?

Our preferred solution would maintain and enhance access to central London and improve the public realm by reducing the impact of motor vehicles in Oxford Street and the surrounding area.

Q.5 What level of congestion reduction do you consider is required? How would you measure success for the surface transport system in the area, i.e. what measurable outcomes would you use, what standards should be met and why.

Journey time reductions and journey time reliability, as measured by TfL's Excess Waiting Time surveys, would be the best performance measurement for bus services. Before and

after satisfaction surveys of both pedestrians and other travellers could be used to measure success.

It is difficult to suggest a figure for congestion reduction. Ideally we would like to see journey speeds and reliability for buses similar to that of the general bus network in central London. A bus journey time reduction of, say 20% along Oxford Street would be a great achievement.

Other issues

London TravelWatch members have expressed concerns about road safety on Oxford Street. The ORB Action Plan highlights this as an issue. We would like to see consideration given to the marshalling of pedestrians as is already done over the busy Christmas period, at some locations.

Yours sincerely