



By Email to: haveyoursay@tfl.gov.uk

2 May 2025

Dear Sir/Madam,

Oxford Street Transformation – Consultation April 2025

We thank you for the opportunity to comment on proposals to transform Oxford Street through the proposed establishment of a Mayoral Development Area (MDA) and associated Mayoral Development Corporation (MDC).

The Central District Alliance and Hatton Garden business improvement districts sit in the heart of central London. Located in the London boroughs of Camden and Islington, between them the two BIDs represent around 970 levy-paying businesses. The economic output covered by these parts of Camden and Islington (Holborn, Bloomsbury, Farringdon and Clerkenwell) is estimated at between £15bn and £20 billion per annum.

Around 186,000 individuals across 20,000 enterprises are located in the neighbourhoods CDA serves. In the case of Hatton Garden, the BID covers an area that is home to some 70 jewellery stores as well as manufacturers and wholesalers. Alongside Bond Street and the jewellery district in Birmingham, Hatton Garden is one of the leading centres for high value gems, precious metals and related jewellery. Both areas are home to around 30,000 residents, many of which form part of less well-off households.

The British Museum alongside Outernet, theatres, hotels, academic institutions and a range of Georgian park squares and gardens attracts many millions of visitors from the country as well as internationally every year. Thanks to the advent of the Elizabeth line, Farringdon and Tottenham Court Road stations form major gateways to this vibrant part of central London. In 2023/24, the two stations handled around 96 million passengers (entries and exits).

Business Improvement Districts including CDA and Hatton Garden work hard to promote their areas and work with their respective local authorities to help maintain them. BIDs often “top-up” the services provided by the public sector which is limited in the amount of public place management it is able to undertake for a variety of reasons. The quality and safety of the public environment are consistently highlighted by our businesses as principal areas of concern and where they want us to focus our resources. The two BIDs spend in the region of £1.5 million a year on improvements to the public realm – both in the form of lasting investments (such as capital expenditure on pedestrian friendly interventions) as well as cleansing, community patrolling and greening initiatives.



The BID is committed to continued economic growth and the prosperity of all our neighbourhoods, and we watch with interest as these proposals take shape. We work closely with the London Borough of Camden in our BID area, and together with them are supportive of proposals that seek to improve the long-term attractiveness and vibrancy of this part of central London.

We respond to each of the specific consultation questions below:

Question 1

The Mayor has proposed the designation of a Mayoral Development Area (MDA) and the establishment of a Mayoral Development Corporation (MDC) to help regenerate Oxford Street in line with his vision for the street. We would like to know your views on this. You might like to consider the proposals in relation to the following areas in doing so:

- **The designation of an MDA and the establishment of an MDC for Oxford Street**

CDA supports the principles and reasons for the establishment of the MDC for Oxford Street as set out in its proposals to drive world class public realm which supports the regeneration of the area in and around Oxford Street. This area impacts on our wider BID community by attracting visitors and providing amenity for nearby commercial neighbourhoods of Bloomsbury and Holborn.

- **The boundary of the MDA**

We welcome the fact that the proposed boundary encompasses not just Oxford Street but also major buildings which surround it. We can see that it also takes a small slice of our CDA BID area. It is also important that consideration is given to the management of any development proposals and planning implications from sites within the MDA and how they affect areas such as on the border.

If the London Borough of Camden were supportive, we would welcome careful consideration of the case for the MDA extending further east towards Holborn and possibly up to the borough boundary with the London borough of Islington and City of London. The major west - east routes of New Oxford Street, Shaftesbury Avenue, High Holborn and Bloomsbury Way present potential for development that could reinforce central London's citywide, regional, national and international functions and in doing so, complement the mayor's plans for Oxford Street.

The London borough of Camden is already working on its Holborn Liveable Neighbourhood programme and we are keen to ensure that the beneficial components of this are not adversely affected by the introduction of the MDA. However, with respect to traffic management, there is significant concern that (partial or comprehensive) pedestrianisation of Oxford Street is likely to affect



the areas we represent – that exist largely beyond the proposed boundary. These include the east – west routes highlighted above, as well as Tottenham Court Road, Gower Street, Charing Cross Road, Euston Road and Kingsway. Understandably, London boroughs pursue projects (such as Camden’s West End project) to deliver on their policy objectives around reducing motorised travel, promoting cycling and so forth – especially on their parts of the road network (as opposed to that of TfL). However, the unusual fragmentation of central London governance with arguably as many as nine boroughs, the City (plus TfL) all pursuing their own transport policies creates real day to day challenges for the effective operation and management of road space in the Central Activities Zone. Whilst TfL currently plays an important role in ensuring a degree of consistency in how central London road space is managed, the reality is that too often the outcomes for users are not as good as they could or should be. For example, roads in the area served by CDA are either often entirely empty of motorised traffic or suffer from chronic congestion where even very low levels of traffic volume exist. This is a highly suboptimal outcome for residents, visitors, workers, bus users and business traffic which (along with taxis and PHV vehicles) make up the majority of the remaining traffic flows on our roads.

In order to maximise the potential success of any Oxford Street pedestrianisation, we consider that TfL should review ownership and control of major roads that lie outside of the proposed MDA and considering carefully if there is a case for their management and control to be changed - including being brought under TfL control. Over the years bus passengers (who are often from lower income households, women and from minority and ethnic groups) in central London have suffered from declining speeds. We therefore consider it is essential that the Oxford Street project leads to an overall improvement in the quality-of-service bus users receive in central London by (for example) managing major roads more effectively.

- **The purpose and objectives of the MDC**

The objective of providing a single vision for Oxford Street to consolidate and bring together overlapping and sometimes conflicting local plans, action plans and neighbourhood plans seems sensible for the realisation of the benefits envisaged for London and the economy of the UK.

- **The approach to the MDC’s functions in relation to planning, other functions and granting discretionary relief from non-domestic rates**

It is important that the MDC provides for a planning system which is more efficient and streamlined than existing arrangements if it is to be successful as an alternative to how planning and other functions are currently undertaken. It will be important that details of how these functions will operate and under what policies from the outset so as not to limit or develop inertia in contrast to the Mayor’s overall objectives.



Working closely with Westminster and Camden councils will be crucial to this and for the continued investment into this area.

- **The composition of the MDC's Board and Planning Committee**

The BID supports the proposed governance structure of the MDC and notes that it will be drawn from the political, public and private sectors. On the planning committee it will be important to ensure that both Camden and Westminster are represented with strong oversight and skilled officer teams making recommendations that can lead to smooth and timely decision making.

Question 2 – The Mayor considers the pedestrianisation of Oxford Street would help to deliver his vision for the area and support its regeneration. What are your views on the principle of pedestrianising Oxford Street?

- **Any thoughts you might have about pedestrianisation, or suggestions for how it could work best**
- **Any other ideas you have to support the regeneration of Oxford Street**

Oxford Street has long been the subject of transformational public realm change. A number of schemes have been put forward in the past, with much work having been done already to reduce bus volumes down the main thoroughfare, alleviate (bus) congestion and improve air quality. There has also been some investment in improving pavement widths on parts of Oxford Street and creating places to more easily traverse the street and even places to rest – especially on the section to the west of Oxford Circus.

We agree there is more that can be done to create a world-leading place for people to enjoy, to stay for longer, to shop and experience all that there is to offer, while attracting new occupiers and investors that will see the benefits that a transformation of traffic and public realm can offer. It will however, be essential to have a well-funded operational plan for Oxford Street and its surrounds. For example, roadworks (and traffic) management, commercial and residential waste collections, upkeep of the public realm, prevention of crime, many forms of anti-social behaviour will need to be funded comprehensively and over the long term. It is absolutely essential that Oxford Street pedestrianisation does not lead to a displacement of problems into surrounding neighbourhoods and that the management and governance arrangements to be put in place respond to managing these impacts – some of which may be beyond the MDA boundary as currently proposed.

As noted above, we have some concerns about the impact of relocating bus traffic and how that will interface with the Holborn Liveable Neighbourhood programme to the east. The CDA BID area has already suffered with displaced traffic as a result of other schemes surrounding us – Covent Garden traffic management, Strand Aldwych and the West End Project. We are keen to ensure that



businesses, residents and visitors in the part of Camden we serve are not adversely affected by proposals for Oxford Street as they come forward and that the opportunity is taken to deliver much more effective street management for (this part of) central London.

We hope you find our comments helpful as you take this proposal forward to the next phase. If you wish to discuss anything with the CDA BID, please do not hesitate to get in touch with me directly: debbie@centraldistrictalliance.com

Yours faithfully

Debbie Akehurst

Chief Executive
Central District Alliance BID