

1 Oxford Street Transformation consultation response

11 Overview

We are pleased to see that the early stages of the Oxford Street Transformation project include Equality Impact Assessments which include many of the key considerations for accessibility that will need to be designed for in later stages. Further essential accessibility considerations including cycling and above-walking-speed mobility aid access are included in our response below.

The demographic assessments already undertaken show that people with protected characteristics, including Disabled people, are under-represented on Oxford Street at present, indicating that change is needed to create equal access to the area. This need is clearly recognised by the project team. We hope this recognition will extend to ensuring final designs, implementation and ongoing management meet pan-impairment accessibility best practice.

Oxford Street is busy, and although it is wide, has limited space to meet the needs of all users. To create the best possible accessibility in the area for all potential users we ask for:

- a) **Wider integration for a connected network:** This scheme needs to be integrated with other pedestrian, active travel and public transport improvement schemes in the area, including the Regent Street and Portland Place schemes, step-free Tube improvements, bus prioritisation improvements and wider accessible cycle and mobility route development.
- b) **Walking/wheeling accessibility considerations:** Many of the proposals currently outlined will improve [walking/wheeling](#) and broader use of Oxford Street by Disabled people. Positive measures include provision of seating, removal of motor vehicles and copious green infrastructure. Additional measures needed include: Publicly accessible toilets (including Disabled and Changing Places toilets), provision of assistance including trained people, on-street mobility vehicles, and connectivity to cycling/above-walking-speed mobility parking, public transport, taxis/private hire vehicles and Disabled parking and drop-off options for private vehicles.
- c) **Cycling and faster mobility aid use accessibility considerations:** We recommend that a cycle and mobility lane is needed on Oxford Street, and that this should be of a generous width (we suggest modelling is required to determine width but anticipate at least 4m minimum 2-way) and with detectable sloped kerb edging min 60mm high.
There are presently no accessible cycle and mobility aid routes along Oxford Street or in the surrounding area. Many Disabled people cannot use any forms of public transport, many cannot drive and do not have access to private vehicles, and taxi/private hire vehicle access is both expensive and problematic (e.g. guide dog and mobility aid refusals). The Oxford Street scheme must provide options for Disabled people using cycles and other [faster mobility aids](#) (i.e. class 3 “invalid

carriages) to reach and move the full length of Oxford Street, including safe routes for moving and parking for aids in convenient, accessible locations.

- d) **Bus accessibility considerations:** If bus routes are moved off Oxford Street, alternative access options must be provided to mitigate the harm to accessibility this will otherwise cause. Mitigations should include on-street mobility vehicles which can transport Disabled people between parts of the street, and access options to and from bus stops – both accessible prioritised footway routes and integration of mobility aid hire and personal assistance with the bus network. Otherwise, retention of buses on Oxford Street will be needed to prevent exclusion of Disabled people from the area.
- e) **Underground accessibility considerations:** The underground to and from Oxford Street is largely inaccessible to Disabled people, with only the Elizabeth Line providing limited access from parts of London along an East-West axis. Significant infrastructure improvements are required to improve accessibility on this important network. There are no nearby overground or mainline rail stations.
- f) **Private vehicles, taxis and private hire vehicles:** We strongly support the proposal to remove private motor vehicles, taxis and private hire vehicles from Oxford Street, **provided that** Blue Badge parking, White Badge parking (including short and long-stay options and rapid access to parking options for visitors), WAV taxi rank and Blue Badge drop-off options are greatly increased in the surrounding area, and that mobility aid hire and assistance provision is integrated with these parking/drop-off locations.

12 Walking/wheeling access on Oxford Street

Oxford Street is linear and largely flat. It can and should have best-practice accessibility for people [walking/wheeling](#).

Many of the proposals currently outlined for the scheme will improve walking/wheeling and broader use of Oxford Street by Disabled people.

Positive measures planned include provision of seating, removal of motor vehicles and copious green infrastructure.

Additional measures needed include:

- a) Publicly accessible toilets (including Disabled and Changing Places toilets) at regular intervals along the street. These could be provided separately from stores, or provided inside stores, as long as there is clear signage on store fronts that such toilets are available inside and are free to use for members of the public without purchases being made. Store opening hours would need to be long for in-store toilets to be suitable.
- b) Provision of assistance including trained people so Disabled people can move around the area safely, with comparable models being rail passenger assistance and Blind and VI people's orientation training schemes.
- c) On-street mobility vehicles to transport people to different parts of the street, or otherwise bus routes to be retained on the street. On-street mobility vehicles must be

free for Disabled users and others with limited mobility, including for visitors from outside London. Vehicles must be wheelchair accessible for all wheelchair types with roll-on low platform design. Similar schemes include small electric mobility vehicles used to transport Disabled people to different locations at National Trust properties and other large outdoor venues. E-assist pedal vehicles, including side-by-side cycle taxis and cycle rickshaws would be a good low-carbon, quiet and safe option.

- d) Connectivity to cycling/mobility aid parking, public transport, taxis/private hire vehicles and Disabled parking and drop-off options for private vehicles.

13 Cycling access

We consider that a cycle/mobility track of generous width (at least 4m but quite possibly more) is needed on Oxford Street so that Disabled people using assistant-driven mobility vehicles, using [larger mobility scooters, class 3 powerchairs and other innovative mobility aid types](#) and using cycles can move about the street safely.

There are presently no accessible cycle routes to or on Oxford Street or the surrounding area. There do not appear to be any nearby streets that could provide reasonable accessibility for Disabled people cycling in the area, nor for accessing Oxford Street itself.

Accessible cycle and mobility aid routes must be developed in a coordinated fashion with other local schemes, including ongoing schemes for Regent Street and Portland Place.

Cycling and faster mobility aids (class 3 “invalid carriages” and innovative e-mobility aids) are essential aids for many Disabled people to make journeys. These devices are not generally permitted on public transport, and cannot be used at above 4mph on pavements, making longer journeys unfeasible unless the aid can be used door-to-door.

The cycle and mobility aid track on Oxford Street will need to have:

- a) Cane-detectable kerbs of at least 60mm, preferably with a “forgiving” sloped profile to reduce trip hazard,
- b) High contrast with the surrounding surfaces.
- c) Controlled crossings for pedestrians: The location is very busy so uncontrolled crossings will not be accessible.

Accessible parking for cycles and mobility aids is needed at regular intervals along Oxford Street, so that people with limited or no walking capacity can use their chosen mobility aids to move between locations on the street.

Provision must be made for people using cycles as mobility aids to use footways at walking speed only. This is essential even with a cycle and mobility aid track on Oxford Street, so that Disabled people can continue to use their chosen aids throughout the outdoor public realm. We consider that any schemes that do not include a cycle and mobility aid track as well as clear permission to use all mobility aids at walking speed on pedestrian infrastructure will have poor accessibility for Disabled people.

14 Public transport access

14.1 Buses

Buses are important for Disabled people's access to and on Oxford Street: The street itself is around 2km long, meaning that many Disabled people will need to use buses or alternative vehicles with comparable function to move between different parts of Oxford Street. Note that the walking distance criterion for Blue Badge eligibility is that a person can walk less than 50m.

If buses are removed from Oxford Street, then walking distances and complexity of routes from the stops to Oxford Street itself will become a barrier to Disabled people's access, unless these barriers are mitigated.

We ask that the pedestrianisation proposals ensure that Disabled people's access to Oxford Street is prioritised. Options could include:

- a) If buses are not retained on Oxford Street:
 - (i) Access between bus stops and the street itself is required. This means that all walking/wheeling routes between bus stops and Oxford Street must be assessed for walking/wheeling accessibility and upgraded to ensure best practice walking/wheeling access is provided.
 - (ii) Mobility aid (mobility scooter/accessible e-cycle/alternative mobility aids) free hire must be integrated into bus route provision with a high-quality scheme along the lines of Shopmobility.
 - (iii) Provision of trained assistants and orientation trainers is needed for Disabled people who require help learning the new layouts and/or each time they need to move from a bus stop to Oxford Street. Potential models for assistance provision include orientation training and assistance models from Blind and VI organisations and passenger assistance on rail services including through stations.
 - (iv) Small, low-speed (including small e-cycle) wheelchair-accessible mobility options will be needed on Oxford Street so that Disabled people with limited walking/wheeling capacity can get to different parts of the street. Comparable models include small low-speed EVs used by many National Trust properties to assist Disabled and older people to move around large sites. These vehicles and e-assist pedal equivalents are small, slow, low-speed, quiet. They pose low risk to people walking/wheeling and would be in keeping with the intended pedestrian environment of the street. They could be used on a cycle/mobility track with detectable kerb edges to improve pedestrian safety and provide a tactile edge for Blind and visually-impaired people to follow.
 - (v) See cycling and walking/wheeling provision for further requirements.
- b) Retaining bus routes on Oxford Street, only if provision of on-street small electric mobility "shuttle" vehicles is assessed as unfeasible. Potentially a single bus lane with passing places at stops could be installed, given the stated bus numbers are as low as 35/hour. Retaining buses would create additional risk of collisions and create

a more complex and difficult streetscape to negotiate, but vehicles which can transport Disabled people between destinations on Oxford Street are essential. Bus routes must not be combined with cycle and mobility routes on Oxford Street: Buses are HGVs and it is not safe or accessible for Disabled people to share space with them, especially in such as busy environment.

14.2 Underground

The underground is inaccessible and largely unusable for Disabled people wishing to get to and from Oxford Street:

The four Tube stations on Oxford Street are Marble Arch, Bond Street, Oxford Circus and Tottenham Court Road. The Elizabeth Line is only underground line which includes step-free access onto Oxford Street. However, many other Elizabeth Line stations require use of ramps, rendering the line overall inaccessible, and there are few accessible connections from other underground lines onto the Elizabeth Line.

1. Oxford Circus has no step-free access to street level, so is inaccessible for Disabled people. Improving accessibility for the Bakerloo and Victoria lines requires installing step-free access to street level for Oxford Circus and other stations on these lines.
2. Bond Street and Tottenham Court Road have accessible routes from train to street from the Elizabeth Line, but ramped access/mini ramp access from other connecting lines. This means Disabled people wanting to use these lines have to know ramp assistance will be needed at the destination, find staff to arrange ramp assistance, then hope that the ramp assistance will arrive. This is an unreasonable burden and an unreliable way to make journeys. We therefore consider Underground stations (and lines) which require ramp or mini-ramp use to be inaccessible.
3. Marble Arch is entirely inaccessible, according to the current Step-Free tube guide map.

14.3 Overground and mainline

There are no overground or mainline rail stations close to Oxford Street:

The nearest accessible train stations are Euston, which is around 2km from Oxford Street and Paddington, which is around 2.5km from Oxford Street.

Blue Badge eligibility (via PIP mobility criteria) requires individuals to be able to walk less than 50m – so the nearest train stations are inaccessibly far from Oxford Street.

Paddington station has accessible underground routes to Oxford Street via the Elizabeth Line.

Euston Station does not have accessible underground routes to Oxford Street.

15 Taxi and private hire vehicle access

We support proposals to remove taxi and private hire vehicle use from Oxford Street as the accessibility and safety improvements that vehicle reductions provide far outweigh the reduction in accessibility some people could experience from removal of vehicle access to Oxford Street. Mitigations are required so that people who would experience some access

reduction from removal of vehicles are still able to access Oxford Street with alternative provisions.

Taxis and private hire vehicles provide essential mobility for many Disabled people who cannot use active travel, public transport or private vehicles for some or all of their journeys.

Proposed side-street access to Oxford Street must include taxi ranks and drop-off/pick-up bay options to ensure that Disabled people have accessible ways to get as close as possible to the parts of Oxford Street they want to reach, and integration of these taxi ranks and drop-off locations with on-street mobility services, mobility aid hire and assistants.

Benefits from removing taxis, private hire vehicles and private vehicles include reduced risk from collisions, crowding reductions, wayfinding improvements, air pollution reductions and noise pollution reductions as well as benefits associated with public realm improvements such as reduced overheating following street tree and green space planting and access improvements from provision of seating.

16 Private vehicle access

We strongly support the proposal to remove private motor vehicles, taxis and private hire vehicles from Oxford Street, **provided that** Blue Badge parking (short and long-stay), White Badge parking (including options for visitors) and Blue Badge drop-off options are greatly increased in the surrounding area, and that mobility aid hire and assistance provision is integrated with these parking/drop-off locations.

Some Disabled people need to use private vehicles to make journeys, for a wide range of reasons. People visiting Oxford Street cannot be assumed to be local – the White Badge scheme will not be suitable for most people visiting Oxford Street. Therefore, short-term, rapid options to gain access to Disabled parking in the area are required. These could be modelled on “visitor” parking permit options commonly used across the UK.

Benefits from removing taxis, private hire vehicles and private vehicles include reduced risk from collisions, crowding reductions, wayfinding improvements, air pollution reductions and noise pollution reductions as well as benefits associated with public realm improvements such as reduced overheating following street tree and green space planting and access improvements from provision of seating.