

FREEPOST TFL HAVE YOUR SAY (Oxford Street)

By email only: haveyoursay@tfl.gov.uk

2 May 2025

Dear Sir / Madam

Oxford Street Transformation – Public Consultation

Response on behalf of the Westminster Property Association

I am writing on behalf of Westminster Property Association (“WPA”) to respond to the consultation on the proposed establishment of a Mayoral Development Area (“MDA”) and associated Mayoral Development Corporation (“MDC”) for Oxford Street.

The WPA (Westminster Property Association) is a not-for-profit membership body, bringing together over 200 property owners, developers, investors and professional advisers to help support the economic prosperity of Westminster. Our full list of WPA members can be viewed [here](#).

WPA and its members are committed to supporting the long-term attractiveness and vibrancy of the West End, and the wider Central Activities Zone (CAZ), as the heart of London’s world city offer. This includes its role as a world-leading office location, as well as its globally attractive retail and visitor offer, whilst being a home to its 211,500 residents.

Oxford Street clearly plays a vital role in the identity and success of the West End, and to both Westminster and Camden. Whilst that role is more famously known for its retail function as part of the International Centre, this increasingly extends to its use as a leisure and cultural location. Importantly, it is also the heart of the West End’s office market, accommodating tens of thousands of high skilled workers, who play a pivotal role in driving Westminster and London’s wider economy. Oxford Street’s economic and social health is very closely linked to its identity as a wider commercial location; spend from workers alone in the West End is estimated to comprise over 20% of total expenditure.

WPA is committed to ensuring that Oxford Street sustains, and strengthens, its contribution to the functions of the West End and increases its appeal to visitors, workers and residents through the continued delivery of modern, attractive workplaces, retail spaces and other uses alongside world-class public realm. Therefore, WPA agrees with and supports initiatives that are designed to help Oxford Street to fully realise its potential. Such initiatives need to be implemented urgently and with clarity to prevent uncertainty for landowners and developers, which risks resulting in less appetite for investment.

It is vital for the success of the wider West End and Westminster that the proposed changes to Oxford Street are treated not just as a physical public realm and urban design project for Oxford Street itself but as a catalyst for the wider cultural and economic transformation of the Oxford Street

corridor, benefitting from the capacity released by the substantial investment in public transport connectivity and securing continued investment, from both public and private sectors, in the development of the area.

WPA has consistently noted the potential for additional development along Oxford Street and supported, during the preparation of the current Westminster City Plan, an ambitious approach to the street, similar to that adopted for the Victoria and Paddington Opportunity areas.

We have responded to the specific consultation questions in the appendix below, but we hope this is a helpful overview of our views on the establishment of an MDA and associated MDC.

We would be very happy to engage further with the Mayor, TfL, Westminster City Council and other relevant stakeholders as proposals progress.

Yours faithfully,



Charles Begley
Chief Executive
Westminster Property Association

APPENDIX 1 – RESPONSES TO CONSULTATION QUESTIONS

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**

WPA supports the shared objectives of Westminster City Council and the Mayor of London to promote the long-term regeneration of Oxford Street and supports any measures that would aid the delivery of that objective. In that context, WPA supports the creation of an MDC as a measure that would support those objectives, however, WPA is unable to explicitly support the use of an MDC until more information regarding its powers, function and governance are made public. The overarching objective must remain the effective future stewardship of the area concerned, and whatever governance arrangements are adopted must be fully funded to support investment.

- **The boundary of the MDA**

WPA considers that it is correct that the boundary of the MDA extends beyond the immediate boundary of Oxford Street itself, to encompass adjacent land and buildings. WPA's consistent position has been that the success of Oxford Street depends not just on the delivery of world class public realm but in promoting the corridor's wider physical, cultural and economic transformation.

It is essential that consideration is given to the management of development proposals and planning applications for sites on the edge of the zone, that either border, or straddle, the MDC and Westminster areas. This is particularly important when highway arrangements on side roads and roads running parallel to Oxford Street need to be amended to accommodate development or change of sites within the MDC area, but those roads remain under the control of Westminster City Council as the highway authority.

Consideration will also need to be given to arrangements where planning permission is granted by the MDC, but arrangements need to be made with a differing highway authority in respect of matters such as servicing, access etc. Whilst detailed matters, these are important as they enable implementation and the build out of schemes. Close joint working will be required to ensure that the proposals do not lead to additional complexity for development being brought forward within this area.

WPA notes that there may be some locations where some consequential changes to the boundary to better align with existing ownership and use patterns may be appropriate.

WPA also suggests that consideration is given to those areas where the proposed boundary would lead to streets being split within and outside of the MDA. It is possible that this may make the management and activation of these streets more challenging and WPA suggests that it may be appropriate to ensure that there is a clear lead authority for each street, where possible.

Further consultation on the boundary line with local landowners and developers should be undertaken to help ensure it captures side and supporting streets where required to ensure public realm improvements are cohesive.

WPA suggests that the flexibility to reconsider or expand the MDA is retained and kept under review during the lifespan of the MDC. WPA recommends that analysis on its impact on the local and wider London economy, delivery of office space and visitor numbers is undertaken during its lifespan to assess its success and underpin any decisions on a potential expansion of the MDA.

WPA does not comment on the detail of the proposed boundary. Individual WPA members may respond in detail on this matter.

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

WPA has set out above its position regarding the vision and objectives for Oxford Street. It would support measures that would contribute to the delivery of that vision and objectives, including the Mayor's desire to deliver world-class public realm to support the regeneration of the area. WPA supports Oxford Street remaining a global destination for shopping, leisure and culture, but would also note the importance of the Street and its immediate environment as a workplace and office location, which in turn also plays a significant part in supporting its retail offer. Those visiting the

West End for work make up 21% of expenditure, according to figures by the New West End Company (NWECC), which indicates the importance of the West End as a location for work in sustaining its diversity of uses.

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

WPA has long advocated that Oxford Street is treated differently by planning policy, a point which we have noted in previous Westminster City Plan submissions. WPA therefore recommends that the preparation of a brief supplemental or replacement local plan for Oxford Street would be appropriate, to ensure consistent planning policy orientated to the particular circumstances of the Street that can support the quality of development sought

WPA considers that the Mayor's vision for Oxford Street could be delivered through planning functions by either Westminster City Council or the Mayor through an MDC. We therefore do not oppose the Mayor taking on planning and associated functions in principle, subject to the detail of the proposed arrangements. Once again, the governance must align with the stated objectives and successful curation of the area within the Central Activities Zone (CAZ).

It is vital that the creation of the MDC creates a streamlined and more efficient planning system and does not result in the delay of planning decisions. Care will need to be taken to ensure that if the MDC is the planning authority, its role is clear and that duplication of work between it and Westminster City and Camden Councils is avoided, and mutual consultation kept proportionate to the scale of the proposals.

The transitional arrangements must be considered early to ensure developers and investors are not discouraged from submitting planning applications in the run up to the launch of the MDC as a result of uncertainty over arrangements for the determination of their applications. There is an urgency to provide certainty in order to encourage investment and development. Delays and ambiguity are likely to result in development being stalled (or not coming forward at all) which undermines the MDC objectives to support the regeneration of the area.

In view of the importance of detailed matters to the success of the MDC's objectives, including development associated with street activation, advertising, temporary events, public art, lighting and sculpture, the WPA considers it is appropriate for the MDC to adopt planning powers in these areas. This is so that the MDC can drive development and planning decisions that will enable the realisation of the Mayor's distinctive vision for the street.

In order to effectively manage the area it is essential the proposed MDC has the financial levers, enabled through NNDR, at its disposal to support the local area and its businesses, this includes powers to manage business rates and grant discretionary rate relief where appropriate.

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

WPA supports the suggested approach to the composition of the Board. WPA notes the importance of ensuring that the MDC draws from political, public and private sectors, to ensure the strategic



importance of this part of central London, nationally and internationally, is represented alongside representatives from Westminster City Council and Camden Council.

WPA's strong view is that there should be a single planning committee for the MDC area, with representatives from both local authorities (as representatives from the wider public sector) as well as businesses and the private sector. This would ensure a consistent approach was taken to planning decision-making across the MDA which would be vital in achieving the Mayor's vision. A single committee is essential to taking a single, holistic view of the MDA.

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?

Please use the space below to provide your answer, including:

- **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**

WPA has long supported bold action to implement much-needed improvement to Oxford Street, and its treatment as a special policy area as a distinct part of the International Retail Area. It supports creating world-class public realm that prioritises visitors to the street on foot whilst ensuring that the area remains accessible and functional, including access for servicing and emergency vehicles and in doing so, in a way that addresses crime.

In terms of traffic displacement, a thorough analysis of impacts alongside further efforts to reduce through traffic, particularly buses, must be undertaken. TfL has made significant steps to reduce vehicular movements, but in order to mitigate impacts of future public realm enhancements, further rerouting of services away from the district must be given due consideration.

WPA considers that there are a range of public realm interventions which may support this objective, although pedestrianisation in whole or part needs thorough analysis as to its potential effects and the WPA looks forward to discussing these in more detail as proposals emerge.

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