

## Consultation response

**1. Our consultation explains why we believe it is necessary to transform Oxford Street. This would mean however potential changes for buses, taxis, cyclists and vehicles making deliveries or servicing businesses. Bearing in mind the changes we would need to make, do you agree with the transformation of Oxford Street in principle?**

*I support the transformation of Oxford Street but I have concerns about the changes that would be necessary*

My concerns, or why I do not support these proposals:

Wheels for Wellbeing supports the proposed transformation of Oxford Street in principle. As one of the UK's most congested and polluted areas, it is crucial that its design and functionality be re-assessed, particularly given that it is enjoyed by so many from both home and abroad. As an inclusive cycling charity that champions active travel, we are always in favour of any measures that seek to reduce reliance on polluting vehicles, in replace of more sustainable modes of travel, such as cycling and walking.

Limiting access to Oxford Street for cars, buses and taxis, either in part or in full, is a policy we would support. Taking such action would clearly be beneficial in terms of reducing (or eliminating altogether) congestion, which would improve air quality and cut noise pollution. Freeing up the street for pedestrians would also help to address the area's capacity problems, improve safety for vulnerable people and increase footfall in shops, thus making for a more vibrant local economy. Removing traffic from Oxford Street would also make it a more attractive and pleasant place to visit.

We agree that for many disabled and older people Oxford Street is a challenging environment, both in terms of overcrowding and safety, which may cause such groups to feel excluded. This is clearly undesirable and every effort should be made to ensure the area as accessible and inclusive as possible.

We also recognise that for many disabled people, particularly those with visual impairments, the presence of cyclists can be a concern. However, we would strongly challenge any proposal seeking to ban cycling altogether from Oxford Street on these grounds, as it wrongly assumes that all disabled people are pedestrians. We know that this is not the case and that many disabled people are cyclists themselves. Indeed, according to TfL's own statistics, as many as 15% of disabled Londoners cycle to get around, compared to 18% for non-disabled Londoners.<sup>1</sup> How disabled cyclists choose to get around – be it by standard two-wheeled bicycle, tricycle or handcycle, is

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<sup>1</sup> Travel in London: Understanding our diverse communities (Transport for London, 2015), p. 223. See <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities.pdf>

largely irrelevant – the key point is that for many disabled cyclists (69% according to our recent survey)<sup>2</sup> cycling is easier than walking, with many *using their cycle as a mobility aid*: often this is because cycling reduces strain on the joints, aids balance and alleviates breathing problems. Just as many disabled people use a wheelchair, mobility scooter or guide dog as their mobility aid, so many disabled cyclists use their cycle for the same reason. Therefore, in order for TfL to meet their obligation to the Public Sector Equality Duty (PSED) and Equality Act 2010, we urge that – should the decision be made to ban cycling in part or in full from Oxford Street – an exemption be made for disabled cyclists who use their cycle as a mobility aid. Failure to accommodate the needs of disabled people as cyclists would not only be a breach of equalities legislation, but it would also deter many disabled people from participating in active travel – a group who are already half as likely as non-disabled people to be physically active.<sup>3</sup> Denying disabled cyclists access to Oxford Street would be harmful to disabled people's health and wellbeing, and would only encourage more sedentary lifestyles.

We are already working with TfL to develop and trial a disabled cyclist's 'Blue Badge' scheme, which would give disabled cyclists (who use their cycle as a mobility aid) the right to cycle considerately in non-cycling areas, as well as an exemption from dismounting in 'cyclist dismount' zones. The latter is particularly important given that many disabled cyclists find it physically impossible to walk and wheel their cycle. In the event of the scheme's initial success, we would anticipate it being rolled out across London and applying to Oxford Street.

**2. Our consultation materials describe the various challenges we would need to address to achieve our vision for the transformation of Oxford Street. We have described possible changes to access arrangements for buses and taxis, and we have explained what the transformation of Oxford Street might mean for cyclists and for freight and servicing. If you have any detailed comments about these or any other issue, please record them below.**

Restricting or removing access to Oxford Street for buses and taxis naturally raises concerns around accessibility for disabled and older people, who are more likely to rely on such forms of transport to visit and make use of the area. However, these concerns can be allayed by considering alternative and innovative options.

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<sup>2</sup> 'Inclusive cycling – assessing the issues faced by disabled cyclists', Wheels for Wellbeing online survey, February-March 2017 (a total of 221 disabled cyclists participated).

<sup>3</sup> *Everybody Active, Every Day: An evidence-based approach to physical activity* (Public Health England, 2014), p.

9. See [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374914/Framework\\_13.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374914/Framework_13.pdf)

For instance, as we have outlined already, many disabled and older people can and do cycle. Therefore, rather than seeing the transformation of Oxford Street as a *problem* for accessibility, it should be viewed as an opportunity. By providing an inclusive cycling ‘shuttle service’ as an alternative to buses and taxis, disabled people will not only retain access to all areas of Oxford Street, but they will be engaging in physical activity and active travel at the same time – a twin outcome that can only be positive. The exact arrangements of how such a shuttle service could work needs to be looked at in more detail; but it is suffice to say that the provision of an inclusive cycling shuttle service at either end of the proposed pedestrianised area of Oxford Street – overseen by an inclusive cycling organisation and operated by trained cycle instructors and mechanics, with funding for a quality fleet of non-standard cycles (handcycles, tricycles, recumbents, tandems, side-by-sides etc.) – is feasible, deliverable and quite possibly desirable. It could also prove a very cost-effective alternative and would eliminate the need for buses and taxis almost entirely.

Similarly, concerns that businesses may suffer as a result of restricted access for freight and delivery vehicles could be extinguished with a move towards more sustainable and environmentally friendly forms of transport. It is already the case in London that many businesses deliver products and services by cargobike, which is fast becoming a growing trend. This practice generates good PR for companies, offers a sustainable form of transport and gives the environmentally-conscience consumer greater satisfaction, whilst at the same time addressing London’s chronic congestion problems and improving air quality. Not all business on Oxford Street will be able to move and receive goods by cargobike, of course, but they should at least be encouraged to engage in more sustainable forms of delivery and transportation. Financial incentives and subsidies could be offered to those businesses that choose to shift their deliveries to cargobike, for example.

**3. We have described how we might improve the look and feel of Oxford Street, and other streets in the district, in both the short and long term. If you have any comments about this aspect of our proposals, or any aspiration for the look and feel of Oxford Street you would like us to consider, please consider them below.**

Comments about the look and feel of Oxford Street

It is important that, whatever steps are taken to transform Oxford Street, the area is made a more appealing and attractive place to visit. Removing traffic, clutter and air/noise pollution from the street will undoubtedly make it a more pleasant place to frequent for everyone.

Whilst we welcome measures that will make Oxford Street look and feel more attractive and welcoming, we do harbour some concerns about the possible practical implications. For instance, whilst attempts to de-clutter the street with planters might be desirable and well-intentioned, it must be ensured that these are positioned in such a way so as not to restrict the movements of disabled cyclists, who may need more space to pass through when using a

non-standard cycle, which are typically longer and wider than standard bicycles, requiring more generous turning circles. Similarly, whilst measures might be considered to restrict access to bicycles (such as in the form of bollards or anti-motorcycle barriers), it must be ensured that these do not impede the movement of non-standard cycles for the reasons just mentioned.

It goes without saying that, for disabled pedestrians and cyclists alike, any transformation of Oxford Street must also include sufficiently wide paths, dropped kerbs and step-free access, in order to be as accessible and inclusive as possible. To accommodate fully the needs of disabled cyclists, it should also be considered that an appropriate amount of inclusive cycle parking and storage facilities be made available, for those who wish to cycle along Oxford Street and make use of the shops. Wheels for Wellbeing would be happy to assist with the design of any such facilities, and indeed with any other aspects of the re-design of Oxford Street that should seek consultation from disabled cyclists.