

London Borough of Camden – Response to Oxford Street Transformation Consultation

Section A: The case for a Mayoral Development Corporation

1. We agree that a bold vision and coordinated action is required to support the long-term transformation of Oxford Street and we support the Mayor's ambitions and the setting up of a Mayoral Development Corporation (MDC) to achieve this.
2. Camden has demonstrated its significant expertise in delivering economic growth, high quality developments through the planning system, planning enforcement to remove blight in the public realm (such as redundant phone boxes), significant active travel improvements, and award winning new public spaces such as Alfred Place as part of our West End Project.
3. However, we recognise that a focused and coordinated effort, with a single guiding mind across the area, may now be needed to transform Oxford Street and realise the growth potential available – a design led approach to place making, that seeks to regenerate the public realm and create a truly world class leisure destination is only to be welcomed.
4. Camden has already delivered the world class and multi-award-winning West End Project, building on this success we are now progressing projects in a number of areas that are complementary to the Oxford Street proposals. These projects should be seen as part of the wider regeneration and growth potential in the city centre, and we want to ensure continued strong collaboration with the Mayor and with the future MDC on this. The key projects are:
 - The Holborn Liveable Neighbourhood (HLN) project aims to transform Holborn into a place for people with attractive, healthy, accessible and safe streets for everyone. This includes proposals for the pedestrianisation of Great Russell Street in front of the British Museum. The British Museum is embarking on an ambitious masterplan, visits to the Museum are above pre-pandemic levels and the public realm around the Museum needs significant investment to maintain its status as London's top visitor destination. The HLN project also includes plans to pedestrianise a section of New Oxford Street, and Great Queen Street in Covent Garden, all vital improvements to support the city centre.
 - Camden is working in partnership with UCL, Birkbeck, University of London and the British Museum on the Bloomsbury Vision which aims to create a cohesive public realm strategy for Bloomsbury, home to London's largest university campus, the British Museum and Knowledge Quarter businesses, moving towards a green, sustainable, safe and climate resilient neighbourhood.
 - At Euston we have been working with UCL, British Land and leading architecture practices on reimagining Euston Road, from a road which divides and blights the area to a place which unites businesses, universities and communities north and south, transforming conditions for cyclists and pedestrians and the economy.
 - In Camden Town we are trailing the pedestrianisation of a section of the High Street and are working closely with TfL on plans to invest in improvements to High Street South to provide a standard of public realm which befits its status as an international visitor destination whilst delivering for the residents it serves.

- In Covent Garden we are progressing the Shaftesbury Avenue Safe & Healthy Streets scheme which includes proposals to improve cycling infrastructure along Shaftesbury Avenue and new public realm in the Phoenix Street/Stacey Street area.
 - In Fitzrovia we have a three phase Safe & Healthy Streets project which begins with a series of improvements to the north of the lower Tottenham Court Road (TCR) area, including upgrades to Howland Street and Whitfield Street. Phase 2 will include proposals for localised measures north of Goodge Street (west of TCR), including local-impact only traffic restrictions including potential measures on Goodge Place, Chitty Street and Scala Street and various pedestrian/public realm and road safety upgrades. Phase 3 is within the MDA area and involves improvements to streets south of Goodge Street (west of TCR) focussing in particular on Charlotte Street and including public realm/road safety upgrades. We expect to work closely with a future MDC and Westminster on progressing these projects.
5. We have also developed a range of supporting policies to enable the sustainable growth of the city centre as a leisure destination while balancing the needs of local residents – for example our first of its kind Evening and Night Time Strategy was developed via a citizens assembly and brought together the views of residents, visitors and businesses to produce a vision and strategy that works to support the economy, while creating a diverse, safe and welcoming experience for residents and visitors alike. Alongside this we are in the process of reforming our licensing policy to support evening and nighttime businesses to thrive.
 6. We welcome the Mayor's recognition that investment in the pedestrianisation of Oxford Street is necessary to deliver on its potential. Alongside the MDC's work and to deliver on the London Growth Plan it should be seen as one project within a programme of transformational investments to support London's city centre growth assets, including the British Museum, Camden Town, the Knowledge Quarter, Theatre Land, Holborn, Bloomsbury and Fitzrovia.
 7. We would encourage the Mayor, GLA and TfL to look holistically at the neighbourhoods adjoining Oxford Street to acknowledge that the attractiveness of 'the nation's high street' can be enhanced even more greatly by investing concurrently in these neighbouring areas. Specifically for Camden, connections into and between Fitzrovia and Oxford Street can be radically improved and Fitzrovia as an area would benefit from reduced through-traffic and public realm investment (these are likely to be even more feasible and thus imperative if the pedestrianisation of eastern Oxford Street ultimately never proves viable).
 8. Fitzrovia contains significant a residential population including in the area proposed for the MDC. The MDC should recognise this when considering potential impacts and ensure it creates ways for residents to make their voices heard, beyond the appointment of elected representatives.
 9. We can see from the consultation document that there is further work to do to get to a detailed design and operating model for the proposed MDC, including functions and powers. We expect to continue to discuss and agree what the final model looks like.
 10. Our offer to the Mayor is one of deep partnership and collaboration to achieve the Mayor's ambitions – we are seeking to form strong partnership arrangements and cooperation agreements with the Mayor in both operations and project delivery, so that the proposed MDC can deliver on its objectives, the city centre is supported, and Camden's communities can play a full and active part in its future. This includes our offer detailed further in this response to

carry out functions on behalf of the MDC, either under direct delegations, or under other management arrangements. We would expect at the same time work closely with Westminster and form appropriate joint working arrangements.

Q.1 Could the Mayor confirm what partnership arrangements they intend to put in place with Camden both in the initial set up phase, and in the ongoing operation, management and project delivery phases?

Section B: Why pedestrianise Oxford Street

Creating a transformed environment through pedestrianisation

11. We welcome proposals to transform Oxford Street through a phased pedestrianisation.
12. The eastern end of Oxford Street is enjoying a revival fuelled by the opening of the Elizabeth Line and investments around the station delivered by both Councils and the private sector. This includes the Outernet (located in Camden) which is one of the most popular destinations in London. Camden has delivered a range of world class improvements to streets in this area, this includes the award-winning West End Project and improvements across Fitzrovia.
13. The consultation document says the first phase would be between Oxford Circus and Orchard St with public realm improvements on the section between Oxford Circus and Tottenham Court Road, as that section would take longer to pedestrianise. Our understanding is that the eastern section may be more difficult to pedestrianise.
14. Camden would support an approach that does not initially pedestrianise the Oxford Circus to Tottenham Court Road section which will allow buses to continue running, maintaining bus journey time reliability and avoiding the potential displacement impact on our road network
15. We would also propose that the Mayor progresses investment in the Oxford Circus to Tottenham Court Road section at the same time as progressing pedestrianisation plans in the west, where we understand a £150m budget has been identified. There is the risk that investment focused only in the western section will impact on the desirability of the eastern section, and reduce the incentive for landlords and occupiers to invest in their buildings.
16. We recommend that as plans across the whole street, that it include restrictions to traffic on Hanway Street (and Hanway Place) from an early stage. These were included in Westminster's original proposals and would transform the pedestrian experience in this area which is currently blighted by rat-running.
17. Hanway Street and Hanway Place are a priority in the near term and could be delivered in the coming year, supporting the visitor experience to Oxford Street (as well as residents on those roads) by smartening them up and creating an attractive new pedestrian-led connection in the Hanway Street Conservation Area. Camden would also recommend locations such as Rathbone Place which is predominantly in Westminster, but which is shared with Camden, which represents an important but currently underwhelming connection between Oxford Street and Charlotte Street, especially at the southern end by Oxford Street itself.
18. Fitzrovia currently suffers from existing, old-fashioned rat running traffic (three principal routes) which create air pollution, road danger and severance. In keeping with Camden's recommendation that the proposed Oxford Street pedestrianisation also benefit adjacent

neighbourhoods, TfL and the GLA should work with Camden to invest in Fitzrovia to support the attractiveness of Oxford Street as a destination, recognising that visitors do not stay only on the high street but will enjoy moving off and on and between neighbourhoods.

Q.2 Does the Mayor plan to progress investment in the eastern part of Oxford Street at the same time as the western part of the street?

Q.3 Would the Mayor plan to implement traffic restrictions on Hanway Place and Hanway Street, and work with Camden to invest in Fitzrovia?

19. The pedestrianisation of Oxford Street has the potential to impact roads in Camden. We would like to make the following recommendations:

- That TfL work with Camden and fund modelling of the impact of pedestrianisation on Camden's roads along with funding to investigate, manage and mitigate traffic displacement. This may include new traffic restrictions and road safety improvements as part of a Fitzrovia Area Wide Scheme.
- That TfL conduct a full assessment of the central London wide impact of the Oxford Street scheme on buses before decisions on the scheme are made with sufficient resources to be made available to local authorities to mitigate any identified impacts. Local residents have expressed their concern to the council about the impact on buses and are anxious for reassurance.
- The Oxford Street scheme has not been factored into the designs or traffic modelling for Holborn Liveable Neighbourhood which will need updating. Recommend that TfL fund and prioritise this work to prevent delays on HLN.
- We recommend that existing TfL resources are maintained on existing Camden focused programmes such as Holborn Liveable Neighbourhood, so that wider benefits continue to be realised.
- We welcome the recognition that the proposals need to work for disabled people and elderly people and freight impacts need to be managed without increasing traffic and pollution on surrounding streets. We recommend joint exploration through a working group with the Mayor and Westminster opportunities for freight consolidation across the area and beyond the proposed MDC boundary to promote last mile deliveries via cargo bike in line with Camden's [Freight and Servicing Action Plan](#).

Q.4 Does the Mayor support the recommendations listed in 19 above for transport modelling, mitigation and resources?

20. Camden delivers many Safe and Healthy Streets schemes through a 'test and learn' approach; employing Experimental Traffic Orders to allow communities and the Council to "try out" a scheme in real life. Such an approach enables ongoing feedback and monitoring during the trial period to explore different options or make improvements based on real life experience and so allowing the community and businesses to co-design a scheme during a trial, helping to decide if a scheme should be made permanent. Camden would support this type of 'test and learn' approach within the Oxford Street programme.

Creating a better and safer visitor experience

21. We agree that pedestrianisation of Oxford St would deliver benefits to Oxford St, and we also need to ensure access for all groups is maintained or improved and that displaced freight, buses, and general traffic does not impact on pedestrian and cyclist safety, air pollution and bus journey times in surrounding streets. For this reason, we welcome the recognition that investment is needed not only on Oxford Street but neighbouring areas to achieve our shared objectives.

Bus routes

22. We recommend that any proposals to change bus routes are carefully modelled and planned to ensure they maintain safety for cyclists and pedestrians on Camden roads and protect or improve bus journey times.

People on cycles

23. If cycling is prohibited on the pedestrianised sections of Oxford Street, it becomes important that safe and convenient east-west routes are provided to the north and south of Oxford Street and ensure these are integrated with Camden's cycle network. New cycle infrastructure can be part of this and can extend existing infrastructure such as on Howland Street and Maple Street, and (forthcoming) Cleveland Street (a north-south route). However, a joint effort between councils, TfL and the GLA to reduce through traffic more generally across Fitzrovia would also support safe and convenient routes for cycling. We also recommend that world class cycle parking facilities should be provided near Oxford Street to drive modal shift this could include 24/7 cycle hub(s) with spaces for cargo bikes, accessible cycles, e-bike charging points and bike repair.

Q.5 How will the Mayor approach east-west cycle routes, and are world class cycling facilities close to Oxford Street planned as part of the pedestrianisation proposals?

Delivery and servicing access

24. Delivery and servicing will need to be carefully managed to avoid displacing impacts on to surrounding roads whilst maintaining pedestrian safety on Oxford St. As above, we recommend joint exploration with the Mayor and Westminster on opportunities for freight consolidation across the area and beyond the proposed MDC boundary to promote last mile deliveries via cargo bike in line with Camden's Freight and Servicing Action Plan.

Section C: Mayoral Development Area Detailed Proposals

Proposed boundary of the Mayoral Development Area

25. We support the proposed boundary of the MDA. The boundary extends 500m north into Fitzrovia, significantly further north than the Westminster boundary. It is important that this area continues to receive the necessary investment to deliver our planned and proposed schemes as set out in Appendix 2 and referred to elsewhere in this response, which is funded by both Camden and TFL. Impacts on residents and others within the area will be a cause for concern locally and it will be important to find ways to channel concerns and find mitigations, including over time as pedestrianisation beds in and becomes established. As set out above, we look forward to developing partnership arrangements with the MDC to enable this to happen.

Mayoral Development Corporation's proposed planning functions

26. The consultation document makes clear the MDC will have all the planning functions available under S202 of the Localism Act 2011 and that the MDC will not arrange for the discharge of any of those functions under section 203 but will look to enter cooperation arrangements with Camden and Westminster in relation to the discharge of relevant functions. Ordinarily, Camden would expect to carry out these planning functions as a normal part of its services. However, we recognise why the Mayor is proposing to retain these powers within the MDC.
27. However, there are some areas where we recommend that functions are discharged back to Camden through any relevant legal mechanisms or if not discharged or delegated to Camden, management arrangements are made with Camden, and that joint arrangements are made for other aspects of planning. While the MDC is being established it may be sensible for it to have the option to delegate back to Camden planning functions temporarily, so that the MDC has time to establish the necessary teams itself. We are also happy to discuss providing services to the MDC to support operations and efficiency.
28. Camden manages a significant volume of planning enforcement issues across the borough, including in the MDC area and delivers an excellent service. For example, we have led pioneering work on removing phone boxes and are leading efforts to tackle the blight of short term lets. We also have a strong track record in monitoring construction management which would remain with Camden as it sits outside the MDC legislation. Therefore, our strong request is for all planning enforcement powers to remain with Camden. This will provide continuity and consistency across the wider West End, reassurances for residents and other affected by planning infringements, as well as offering operational efficiency for the future MDC.
29. Camden requests that current arrangements for spending local CIL on a ward basis to be retained and recommend a joint process for strategic CIL to agree how CIL generated within the Camden boundary is spent in Camden.
30. For S106 we request that the development funds generated within Camden are retained by Camden, and we provide more detail on the S106 commitments and associated programmes that we expect to continue to deliver. There is also the opportunity to work with the Mayor and WCC on new programmes, for example to support Oxford Street and the retail and leisure sectors.
31. Generally, we propose regular and ongoing partnership meetings which could include sharing of information, local knowledge and insight, and best practice, as well as ongoing operational coordination meetings, to help smooth the transition and ensure once fully established our activities are coordinated to the benefit of Camden, the MDC and WCC.

Plan making functions.

32. Camden will submit its Draft Local Plan this autumn and hopes to adopt it in summer 2026.
33. Camden's planning policies would remain relevant until such time as the MDC adopts its plan for the MDA at which point they would cease to be of relevance to the determination of planning applications within the MDA. We recommend that the MDC works in partnership with Camden and Westminster in drawing up a new plan for the MDA, through regular dialogue, co-design and commissioning, to ensure it is no less ambitious than Camden's new Local Plan and

the Fitzrovia Area Action Plan and includes those policies we have applied successfully in the area, such as the housing uplift policy.

34. Camden recently adopted the Holborn Vision which is a Supplementary Planning Document and was prepared following extensive community and stakeholder engagement. We recommend that the MDC takes this into account in carrying out its planning function.
35. The MDC would be responsible for neighbourhood planning. Camden has adopted seven neighbourhood plans and whilst there are no neighbourhood forums in the Camden part of the MDA, Camden would be happy to advise the MDC in carrying out this function if the need arose.
36. We recommend that the MDC draws on Camden's substantial expertise in planning policy, place making and design, and existing Camden policy is reflected in the future MDC Local Plan as far as is practical, so as to avoid excessive divergence between adjacent planning authorities.

Q.6 Does Mayor support these recommendations in 32-36 for the approach to plan making?

Community Infrastructure Levy

37. The MDC would be the charging authority for the purposes of the Community Infrastructure Levy. Currently 25% of Camden CIL is retained and spent by the ward it is generated in, and we expect that this arrangement would be maintained and would not support proposals that remove this local CIL element.
38. The rest of Camden's CIL is an important source of funding for the Council's capital programme and Camden expects a joint process to be established for agreeing how this is spent and for any CIL generated within the Camden part of the MDA to be spent in Camden. We would not support CIL generated in Camden being spent outside of Camden.
39. Camden CIL receipts for the last three years for the MDA area are shown in Appendix 1.
40. Camden intends to review its charging schedule in 2026 and would want to work in partnership with the MDC on any new charging schedule it intends to prepare to ensure charges are consistent and fair across the city centre.

Q.7 Can the Mayor confirm who will be responsible for collecting CIL within the MDA?

Q.8 Can the Mayor confirm that 25% of CIL generated within Camden's boundary would be retained by the relevant ward and spent according to the current Camden process?

Q.9 Can the Mayor confirm that there would be a joint process with Camden for any strategic CIL retained by the MDC, to agree how this CIL is spent, and that CIL generated within the Camden boundary is spent in Camden?

Planning application functions (Part 3 of the Town and Country Planning Act 1990)

41. Appendix 1 shows the types and numbers of applications received within the Camden part of the MDA in each of the last three years. Camden would usually expect to retain responsibility for determining planning applications within the MDA, however we understand the Mayor is not minded to discharge the functions in Part 3 of the TCPA 1990 back to the Councils.
42. Camden has considered whether certain types of applications could be discharged back to the Council. We think that this would be confusing for residents and businesses and therefore

accept that if the Mayor does take planning application powers that the MDC should determine all applications within the MDC. However, Camden is happy to support decision making by the MDC through cooperation or collaboration agreements, which could extend to providing services on behalf of the MDC, for example pre-application advice. We would welcome further discussion on working arrangements as the design of the MDC progresses.

Article 4s

43. The MDC would be responsible for Article 4 Directions. Camden made an Article 4 Direction which covers part of the MDA and removes the permitted development right for offices and other Class E uses to convert to residential without planning permission. This direction helps prevent important commercial space being lost to poor quality housing outside the planning system. There is also a borough wide Article 4 in relation to basement development. It is important that the MDA maintains these directions and Camden would object to any proposal to reverse them.

Q.10 If the Mayor retains these functions, would the Mayor propose to maintain existing Article 4 Directions?

S106

44. S106 receipts for the MDA within Camden for the last three years are shown in Appendix 1.
45. Whilst most planning applications with the Camden MDA will be minor, there may be sites such as 6-17 Tottenham Court Road which are more significant. If the Mayor retained responsibility for determining major planning applications, we would recommend that S106 from developments in the Camden part of the MDA would be used to mitigate local impacts and to deliver improvements within their vicinity. For example:
- We have a well-developed approach to S106 to support our employment, skills and training programmes this includes Good Work Camden, STEAM and the Inclusive Business Network, and any major development within the MDA should continue to support these.
 - We would expect carbon-offset payments to continue to go to our Camden Climate Fund to support local carbon reduction projects.
 - We have an ambitious programme of improvements planned to public realm and streets in and around the MDA and we would expect S106 from developments within the MDA to continue to support these in line with Camden's Transport Strategy and spending plan. A full list is provided in Appendix 2, and we welcome the opportunity to discuss these plans with the GLA and MDC.
 - We have a comprehensive approach to managing construction impacts through the requirement for Construction Management Plans supported by Construction Working Groups and where appropriate Construction Impact Bonds. This is supported by Camden's site inspectors and a transport officer to ensure compliance, funded by CMP fees which we would wish to retain. As with enforcement, we recommend that this work remains with Camden, simply for continuity and efficiency purposes.
 - We consistently secure contributions for Travel Plan Monitoring, again it will be more efficient from Camden to continue to provide this service.
 - Our Local Plan requires 50% of the commercial uplift on major developments to be residential, where this can't be provided on-site or on an alternative site, we secure a payment in lieu of Camden's Affordable Housing Fund which is an important source of funding for Camden's Community Investment Programme and for developments by other

Registered Providers. We would expect respective developments within the Camden part of the MDA to continue to comply with this requirement and any payments in lieu to continue to be paid to Camden's Affordable Housing Fund.

46. We understand the Mayor has, in principle, agreed a mechanism that will enable Westminster City Council to retain development funds collected in the area via s.106 agreements, and the same arrangement should apply in Camden.
47. Our recommendation is that delivery of the functions that arise from these s.106 commitments remain with Camden, given we have well established delivery teams for economic development, carbon offset, jobs brokerage, and highways and public realm investment, construction management plan monitoring, and travel plan. This list is not exhaustive, and we recommend further discussion on how to secure delivery of s.106 commitments.

Q. 11 If the Mayor retains major planning applications, will they work with Camden to retain the s.106 commitments and housing policy uplift set out above and Camden's wider planning policy?

Q.12 Does the Mayor support our recommendation that within Camden's boundary, Camden continues to be the delivery route for Camden's usual s.106 commitments including those identified above?

48. However, we recognise that given the specific retail and leisure offer that may be developed for Oxford Street, there is the opportunity for new programmes to support the street and these sectors. We propose to work closely with the Mayor and WCC to develop these programmes, in line with the London Growth Plan's Inclusive Talent Strategy.

Other planning functions

Enforcement

49. The Council receives around 20 enforcement complaints a year for the MDC area. We run a highly effective enforcement service, and most of these complaints are resolved informally through negotiation. We issue around 2 formal enforcement notices each year in this area.
50. The Mayor intends to take planning enforcement powers and we understand cannot discharge this function back to the Councils. Major enforcement issues here include short term lets and phone boxes. We have pioneered the approach to removing phone boxes which is now recommended by national government as best practice and have been at the forefront of research and lobbying on short term lets with significant recent enforcement successes.
51. Construction management is also a significant enforcement issue although this sits outside the MDC legislation so would remain with Camden. Camden has detailed guidance on this issue and employs CMP site inspectors and CMP enforcement officers to ensure compliance funded by the CMP implementation support fee and the bond we secure through S106 agreements.
52. Given most of Camden's part of the MDA is somewhat detached from Oxford Street, and we understand from GLA advice that the enforcement function cannot be discharged back to Camden and we understand that construction management would remain with Camden, we strongly recommend Camden retains its enforcement function and the MDC does not take these powers in the first place. This will provide continuity and consistency across the wider West End and across enforcement and construction management, as well as offering

operational efficiency for the future MDC. Effective enforcement usually involves multiple council departments – working with colleagues in noise or environmental health for example.

53. If the Mayor does retain planning enforcement powers, we would wish to work closely with the MDC to continue effective enforcement in these areas. This should extend to considering under what contractual or management arrangements Camden can carry out these functions for a future MDC on a day-to-day basis.
54. We are awaiting new planning legislation on short term lets which may require an Article 4 direction to remove new permitted development rights.

Q.13 What is the intended approach to planning enforcement?

Q.14 How will the MDC approach construction management plans and enforcement?

55. As with other areas in the consultation, we are happy to work with the MDC so that it benefits from the expertise we have built up in this area.

Tree management

56. The number of trees works applications each year are very minimal, with on average 1 a year.

Conservation

57. The Camden part of the MDA contains three conservation areas: Charlotte Street, Hanway Street and Denmark Street. It contains around 50 listed buildings. The MDC would be responsible for these and is not able to discharge this function back to the Council. We welcome that the Mayor proposes that the conservation areas will remain as they are with existing guidance, appraisals, management strategies and audits continuing to apply until such time as any amendments are made by the MDC. Camden recommends that the MDC work closely with Camden and Westminster to ensure a consistent approach to these conservation areas including engagement with Conservation Area Committees. Camden has heritage expertise and as part of ongoing partnership arrangements we recommend the MDC asks Camden to support it in carrying out its conservation responsibilities.

Engagement

58. It is vital that the voices of residents and businesses continue to be heard through the planning process and in the ongoing operation of the MDC.
59. Our Statement of Community Involvement sets out how Camden will involve and engage local people, local businesses and other organisations and key stakeholders when we prepare our planning policies and consider planning applications. The MDC will have the power to adopt an SCI and we are happy to work with the MDC to ensure its commitments to engagement meet or exceed Camden's. Some things worth highlighting are:
- For the largest schemes we hold Development Management Forums using the communityuklive platform.
 - We are leading a project to develop digital site notices to engage a more diverse range of residents. Digital site notices are currently being used to consult on major applications and are in addition to physical site notices. We would be happy for the MDC to join this project.

- Camden does not send consultation letters for planning applications but instead uses an email alert which contains details of proposals and links to the application documents and comments form and also alerts subscribers to applications and appeals received and decided. In addition, Camden Account holders receive details of current planning applications near to them in the planning section of their account. We would advise the MDC to use the same method to avoid different consultation methods being used within and outside the MDA.
- A map showing the location of all planning applications submitted in the last 7 days is available on our website. This can be found online and again we would be happy to explore how this could include MDC applications.

Q.15 Will the Mayor explore joint working on digitalisation of planning and approaches to community's engagement?

Community safety

60. Community safety is a significant area of work in the Oxford Street locality. It will be really important alongside the MDC that the Mayor and the Met work with Camden and Westminster and local BIDs on tackling any crime and safety issues, especially after dark. This will need coordinated action and consideration of common enforcement powers such as Public Space Protection Order (PSPOs) across the MDC area and immediate surroundings.
61. There are related challenges around homelessness encampments around Tottenham Court Road and supporting people experiencing homelessness. We would recommend joint working on this issue with the Mayor and WCC. Camden has recent experience in Camden Town in preparation for the trial pedestrianisation of the High Street where we have worked collaboratively with the police, the BID and major landowners, and as that progresses we would recommend shared learning with the future MDC.

Other Council Services - Highways and Parking Management

62. We note that the consultation document includes no reference to parking or highways powers. We have received assurances that Camden would retain its highways and parking functions.

Q.16 Can the Mayor confirm that within Camden's boundaries that Camden would retain its highways and parking powers and functions?

63. On the assumption that Camden would remain the highway authority then we would like clarification on the MDC's status as a statutory consultee on Camden schemes and what level of powers the MDC would enjoy.

Q.17 Can the Mayor confirm that the MDC will not have the powers to block any changes within Camden we would propose under highways powers?

Other Council Services – Licensing and Regulation

We note the recent announcement that the GLA and MHCLG are exploring a potential pilot for new licensing powers for the Mayor, and a consultation will commence in due course. Camden will respond to the consultation and expects to work collaboratively with the Mayor on the pilot, and on any primary legislation that may be needed to make it possible. However, consideration will

need to be given to the overlap between licensing regulations and planning conditions in relation to use and operating hours, and how this is managed consistently.

Non-domestic rate relief

64. We support the principle around protecting high street retail and leisure, however we recommend that costs and implications of rates relief decisions are considered in full before decisions are taken. It would be useful to understand if this is intended as broad-based approach to rates relief or to only be used under defined, exceptional circumstances.

65. We are happy to work through these issues in more detail, our key questions are:

- **Q.18 Will Camden be reimbursed for any income lost because of discretionary awards made to business rates accounts?** We recommend that this follows the process for Retail relief or Covid-19 Additional Relief Fund (CARF) awards where the council is paid the money up front via NDR1 type estimate with any changes picked up at the end of year via an equivalent to the NDR3 return. This would be a simpler (subject to IT constraints) process than piecemeal payments that result from single awards approved.
- **Q.19 What would be Camden's role in applying relief and will any relief be applied and administered?** This will have an impact on administration costs for the council.
- **Q.20 Will the Mayor cover the administration costs to Camden for resourcing (officers, managers dealing with complaints, etc.), reporting and IT costs, and any indemnify Camden against any legal costs, for example that arise as a result of legal challenges?**
- **Q.21 How has the impact on businesses adjacent to the MDA not eligible for any proposed relief been considered?** Businesses on the edge of the MDA may put pressure on Camden to match reliefs. This is likely to see increased contact and challenge from those businesses directed to the Council which may also be replicated with the charity, CASC and not for profit sectors.

Composition of the MDC's Board

66. Camden has a mission that by 2030 those holding positions of power in Camden are as diverse as our community and the next generation is ready to follow. Therefore, it is important to Camden that the board is as diverse and representative of the groups who visit, work and live in the city centre and in the MDC boundary.

67. On the assumption that the Mayor's eight nominations will include people who meet this criteria, we are happy with our representation.

Composition of the MDC's Planning Committee

68. We strongly support a separate planning committee for Camden's part of the MDA. This should include at least two Camden Councillors and local representatives. We are happy to discuss potential members with the GLA.

69. If the Mayor decides to proceed with one planning committee for the MDA, then for applications within Camden, two Camden Councillors should sit on the committee, for applications in Westminster this could reduce to one Councillor.

70. The scheme of delegation should be consistent with Camden's until such time as the national scheme of delegation is introduced.

Financing the MDC

71. As covered earlier in this response the Council would not support S106 and CIL generated within the Camden part of the MDA being spent outside of Camden, especially since the MDA boundary is drawn much tighter in Westminster than Camden, thus limiting the potential receipts generated within the Westminster part of the MDA.
72. We support the view that the MDC may need to spend in locations outside of the MDA in cooperation with relevant authorities to achieve its objectives.

Date of commencement and lifespan

73. We recommend clear milestones should be set for the MDC to achieve its objectives which would enable the Mayor to be clear on its lifespan so that it does not continue for longer than necessary.
74. The criteria for review should include what impact the MDC has had on improving the areas surrounding the MDA, with thorough and ongoing evaluation built into the MDC budget.

Appendix 1

Table 1
Planning applications

Year / Type	Count	Fees receivable
2022		
Advertisement Consent	10	£1,422
Approval of Details	3	£266
Approval of Details (Listed Building)	1	£0
Full Planning Permission	23	£11,918
Listed Building Consent	7	£0
Non-Material Amendments	1	£234
Variation or Removal of Condition(s)	1	£234
2022 Total	46	£14,074
2023		
Advertisement Consent	8	£1,122
Approval of Details	1	£34
Certificate of Lawfulness (Proposed)	2	£140
Full Planning Permission	11	£17,466
Householder Application	2	£412
Listed Building Consent	9	£0
Non-Material Amendments	2	£468
Section 106A	1	£0
Variation or Removal of Condition(s)	2	£468
2023 Total	38	£20,110
2024		
Advertisement Consent	14	£2,393
Approval of Details	3	£435
Certificate of Lawfulness (Proposed)	5	£509
Full Planning Permission	14	£11,008
Listed Building Consent	6	£516
Variation or Removal of Condition(s)	1	£293
2024 Total	43	£15,154
Grand Total	218	£71,762

Table 2
CIL and S106

Application No	Site Address	Decision Date	CCIL Receipt Value	Total Collected s106	CIL Liability Notice
2020/4549/P	Offices And Premises, 1st Floor, 23 Goodge Street, London, W1T 2PL	29/09/2021		£672	
2022/0568/P	Central London Police Station, 16 - 24 Whitfield Street, London, W1T 2RA	07/11/2022			
2022/2626/P	Central London Police Station, 16 - 24 Whitfield Street, London, W1T 2RA	27/10/2022			£15,453
2023/3808/P	55 Tottenham Court Road & 16-24 Whitfield Street, London, W1T 2EL & W1T 2RA	05/06/2024			£93,650
2022/4321/P	25 Rathbone Place, London, Camden, W1T 1JB	28/11/2023			
2021/1374/P	30 Percy Street, London, W1T 2DB	13/08/2021			
2022/4794/P	Upper Flat, 28 Charlotte Street, London, W1T 2NF	18/12/2024		£19,499	
2024/1971/P	51-52 Tottenham Court Road, London, W1T 2EQ	29/01/2025			
			£93,650	£20,191	

Table 3 – Enforcement cases

Enforcement cases	Status				
Year/Type	Informal	Formal	Complete	APPEAL LODGED	Grand Total
2022					
Advert			1		1
Breach of Condition			2		2
CMP			1		1
Estate Agent Board			1		1
Short-term Let	1				1
Works to Commercial	1		4		5
Works to Listed Bldg			3		3
Works to Residential			1		1
2022 Total	2		13		15
2023					
Advert			5		5
Breach of Condition	1		4		5
Change of Use	1				1
CMP Inspection	1				1
Short-term Let				1	1
Works to Commercial			1		1
Works to Listed Bldg	1				1
Works to Residential			2		2
2023 Total	4		12	1	17
2024					
Advert	1				1
Breach of Condition			1		1
Change of Use			2		2
Short-term Let	1		1		2
Works to Commercial		1	4		5
Works to Listed Bldg			1		1
Works to Residential			1		1
2024 Total	2	1	10		13
Grand Total	11	2	61	1	75

Appendix 2 – Transport Strategy Projects

Within MDC

Future Projects

- **Fitzrovia Area Safe & Healthy Streets Phase 3** – improvements to streets south of Goodge Street (west of TCR) focussing in particular on Charlotte Street and including public realm/road safety upgrades. Note that the local BID (Fitzrovia Partnership) is very supportive on seeing this scheme come forward. Estimated scheme cost: £500k.

Adjacent to MDC

Current public realm/transport investments (defined as being in progress with consultation having taken place but full construction yet to commence/complete) Investment programmed in for these current projects: circa £3.5m)

- **Fitzrovia Safe & Healthy Streets Phase 1** – a series of improvements to the north of the lower TCR area, including upgrades to Howland Street and Whitfield Street using s106 funding from the 100 Tottenham Court Road development. [Consultation on the scheme has completed, decision report](#) approved and we are gearing up for construction later in 2025.
- **Bayley Street/Percy Street Safe & Healthy Streets** – this has included relocating a Santander Cycle Hire docking station from Bayley Street to Percy Street (that element of the scheme is now complete) and creating a new pocket park/public realm area on Bayley Street following the completion of the site at 247 Tottenham Court Road. The latter element on Bayley Street has recently had the Traffic Management Order stage completed and is now moving forward to construction. Details [here](#).
- **Alfred Mews** – we are currently completing construction on new footways, continuous footways and other minor public realm improvements on this short street just off Tottenham Court Road. Details [here](#).
- **Adeline Place** – new Santander Cycle Hire docking station, cycle permeability, urban greening, footway and public realm improvements on this street just to the east of lower TCR funded by s106 from local development. Consultation and decision approved [as here](#); next step is TMO consultation (20th Feb 2025) and then implementation later in 2025.
- **Bucknall Street/Earnshaw Street** – new traffic management measures (including traffic filters, one-way streets), DBH bays, zebra crossings, improved footways and other public realm upgrades funded by s106 from local development. Consultation and decision approved [as here](#); TMO complete and now gearing up towards construction in early 2025.
- **Cleveland Street Cycleway** – Westminster-led scheme which was consulted on a few years ago and we are working with them to bring this forward to construction stage. <https://www.westminstercycling.org.uk/cleveland-street>
- **Shaftesbury Avenue Safe & Healthy Streets** – cycling corridor on our section of Shaftesbury Avenue (east of Charing Cross Road) but potentially of more interest to the

Oxford Street MDA is the proposed closure of Phoenix Street and creation of new public realm in the Phoenix Street/Stacey Street area. [Consultation has taken place](#)

Future public realm/transport investments (consultation not yet taken place) Investment planned for these future projects: circa £41m.

The below initiatives are being brought forward in line with the Cabinet-approved plans for the next Camden Transport Strategy 3-year Delivery Plan period for 2025-2028 (see here: <https://democracy.camden.gov.uk/ieListDocuments.aspx?CId=122&MId=10817> item 8)

- **Fitzrovia Area Safe & Healthy Streets Phase 2** – localised measures north of Goodge Street (west of TCR), including local-impact only traffic restrictions including potential measures on Goodge Place, Chitty Street and Scala Street and various pedestrian/public realm and road safety upgrades Estimated scheme cost: £500k.
- **Holborn Liveable Neighbourhood** – multiple improvements to the east of the area in question but with traffic management/modelling and bus routing impacts. [more information here](#). Estimated scheme cost: £40m.

Previous public realm/transport investments (investment to date from all projects: circa £41m)

- **West End Project** – [£35m range of transformational safer, healthier streets initiatives](#) in the lower TCR/Fitzrovia border area. Specific schemes explicitly in the lower TCR area include the pedestrianisation and re-working of roads in St Giles Square and making TCR itself buses/cycles only Monday to Saturday throughout the day, and the upgrades to Whitfield Gardens. Completed 2022/23.
- **Charlotte Street Streateries** – investment in new kerbside space for outdoor dining alongside traffic management changes on the lower section of Charlotte Street (closest to Oxford Street). Scheme introduced as a trial and a [decision to make permanent](#) completed in early 2025. Circa £50k investment