

Oxford Street Transformation Consultation **Response from Heart of London Business Alliance**

Introduction

Heart of London Business Alliance (HOLBA) welcomes the opportunity to respond to the GLA's consultation on the establishment of a Mayoral Development Corporation (MDC) and the designation of a Mayoral Development Area (MDA) for Oxford Street.

HOLBA is a business leader representing over 700 businesses and property owners in the 'Heart of London' which includes iconic areas of London's West End such as Piccadilly, Piccadilly Circus, Haymarket, Leicester Square and St. Martin's Lane. We are committed to enhancing the area's economic, cultural, and social vitality and the success of the area we represent is integral to the West End's overall economic performance and international reputation. It is in this context that we respond to the questions provided.

Our principal recommendations in response to the Mayor's draft proposal are set out below:

- **Broaden the MDA's scope to reflect the interconnected West End economy and deliver coordinated investment**

The MDA must be part of a coordinated strategy that recognises the West End as a single interconnected economy, ensuring pedestrianisation and investment initiatives benefit the whole area, not just Oxford Street.

- **Deliver a single, co-ordinated economic development strategy for the West End to drive business growth and the Experience Economy**

The MDC must align planning, licensing, and economic development to create the conditions for growth across the West End. Business rates reform is critical to protect central London's global competitiveness, and policies must actively champion the Experience Economy as a key driver of investment, innovation and jobs. Ring-fenced Community Infrastructure Levy and Section 106 contributions generated within the MDC area should be strategically reinvested across the wider West End district to maximise the whole district's economic potential.

- **Adequately consult businesses and develop a clear servicing and logistics strategy for pedestrianisation**

Pedestrianisation of Oxford Street must be shaped through detailed consultation with businesses across the West End. A full review of servicing and freight operations should lead to a formal strategy, including support for delivery consolidation hubs to reduce congestion and maintain business access.

- **Prioritise safety and security as a foundation for economic growth**

The MDC must embed public safety into its plans, including a Strategic Crime Taskforce, dedicated West End policing, an expanded CCTV network, and stronger collaboration between businesses and the police to tackle rising crime and protect the West End's reputation.

- **Embed strong governance, sector expertise, and inclusive funding in the MDC structure**

The MDC Board must include placemaking and Experience Economy experts, with HOLBA and other local BID's included to ensure adequate representation for the business community. HOLBA also recommends establishing a Culture and Experience Economy sub-committee to advise on placemaking and cultural investment to support the sustainable growth of the West End's Experience Economy which is central to achieving the London Growth Plan's ambitions.

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**
- **The boundary of the MDA**
- **The purpose and objectives of the MDC**
- **The approach to the MDC's functions in relation to planning, other functions and granting discretionary relief from non-domestic rates**
- **The composition of the MDC's Board and Planning Committee**

HOLBA plays a vital role in London's West End helping to power and steer its growth, cultural vibrancy, and global competitiveness. In this context, HOLBA appreciates the Mayor of London's focus on Oxford Street and recognition that the West End is a critical driver for London and the UK. The establishment of an Oxford Street MDC could be the first step in a package of policy and funding interventions needed to ensure the West End can thrive.

As outlined in the MDC proposal, bold vision and co-ordinated action is now needed to unlock the West End's potential. Fragmented decision-making and complex planning frameworks have consistently hindered progress across the area, not just Oxford Street. Designating the MDC as the local planning authority has the potential to deliver new leadership, resources, and the coordination to drive future development, growth and regeneration at pace. If implemented as part of a wider, joined-up strategy, this designation could unlock the full placemaking and economic value of the district. Revenue generated from application fees (including planning applications), contributions from Section 106 agreements and Community Infrastructure Levy receipts that will be ringfenced for the area also presents a valuable opportunity to invest in the district.

However, Oxford Street cannot be regenerated in isolation. Its success is tied to the wider West End's reputation and performance. Its long-term viability depends on delivering an outstanding experience across the district, including improvements to the public realm, enhanced safety and security, and a vibrant retail, hospitality, and cultural offer. Developing a new vision, character and

identity for Oxford Street should also consider the character and identity of other districts across the West End. Oxford Street should complement and not detract from other established districts.

The Heart of London area, which contributes 33% of the West End's GVA (despite covering only 12.8% of its area)¹ is home to many of its most iconic attractions – including Leicester Square, Piccadilly Circus, St Martin's Lane, and one-third of the West End's theatres and plays a vital role in shaping visitor perception. To continue attracting investors, visitors (domestic and international) and employers, the Mayor must prioritise investment across the whole district, reinforcing its strengths as a global centre for the Experience Economy - one of the core pillars in the London Growth Plan.

The boundary of the MDA

HOLBA notes that the MDA boundary is not yet fixed and urges the Mayor to ensure it does not limit support to the boundary alone. The West End functions as a single, interconnected district. A narrow focus risks missed opportunities to unlock wider growth and regeneration. Areas such as Leicester Square, Piccadilly Circus and St Martin's Lane are central to the West End's appeal and economic output, and must be supported alongside Oxford Street.

As the key artery between Leicester Square, Soho and Tottenham Court Road, Charing Cross Road needs significant improvement (from The Strand to Tottenham Court Road) to realise the wider benefits from improvements to Oxford Street and the Elizabeth Line. It should be a central element of any investment plan for the West End's regeneration, and the Mayor's strategy should include a clear commitment and dedicated funding to improve Charing Cross Road alongside Oxford Street.

The purpose and objectives of the MDC

Recognising the West End's central role in driving London's growth, HOLBA acknowledges the Mayor's ambition to revitalise Oxford Street as an important first step and supports the proposed objectives of the MDC. The focus on strengthening the retail and leisure offer, enhancing the public realm, and delivering a safe, accessible, and vibrant environment aligns with HOLBA's priorities for the West End and is critical to restoring Oxford Street's status as a world-leading destination.

However, to ensure the initiative delivers meaningful benefits for businesses, residents, and transport users, further action is needed. In addition to the measures already proposed, HOLBA is therefore also calling for the following additional actions to be implemented within the MDA area:

Public safety in the West End

To successfully regenerate Oxford Street, it is essential that the MDC prioritises safety and security across the wider West End. A targeted focus on Oxford Street alone risks displacing crime to neighbouring areas, rather than addressing the underlying challenges across the district. As the London Growth Plan recognises, public safety and effective policing are vital to high street recovery and long-term economic success. High levels of crime and antisocial behaviour deter visitors, reduce business confidence, and damage local economies. Strong, visible and effective policing is therefore

¹ Annual Economic Real Estate Report 2023 – 2024, Heart of London Business Alliance

needed to create safe, welcoming spaces where people want to spend time and money—making public safety a foundation of the West End’s economic resilience.

Given the scale of the West End’s economic contribution, maintaining public safety must be treated as a strategic priority, not an operational afterthought. A dedicated, ringfenced policing resource is essential to ensure consistent visibility and rapid response across the district, with no risk of officers being routinely abstracted to other areas. Embedding this commitment within the MDC’s delivery plan and governance structures would recognise the West End’s unique pressures as a global destination, providing the security foundation needed to support investment, business confidence, and long-term growth.

The scale of the problem cannot be overstated. Oxford Street and the broader West End account for 65% of all crime in Westminster², with thefts—by far the most common offence—tripling over the past two years.³ Public perception is also deteriorating rapidly: in 2024, social media posts referencing crime in the West End more than doubled (compared with the previous year), with 78% expressing negative sentiment.⁴ This reputational damage undermines confidence among businesses, investors, and visitors.

With crime rates in Westminster 27% higher than the London average⁵, both actual incidents and perceptions of safety are significantly impacting the visitor and worker experience. Addressing public safety is critical to sustaining the area’s global competitiveness and ensuring people feel confident visiting, working, and investing in the West End.

HOLBA is therefore calling for:

- The creation of a new Strategic Crime Taskforce for the West End that would bring together HOLBA in partnership with the New West End Company to work together with key stakeholders, including the Government, Greater London Authority, Metropolitan Police Service, Transport for London and Westminster City Council. The Taskforce would focus on developing a comprehensive Crime Reduction Strategy for the West End.
- Increased police presence on the ground, a dedicated Borough Commander, and the establishment of a Borough Command Unit for the West End to respond to its unique challenges.
- An overhaul and expansion of the West End’s CCTV network, accelerated delivery of 24/7 control centre-monitored CCTV and the deployment of advanced monitoring technologies, including live facial recognition, in high-footfall areas, supported by a sustainable funding model. Cameras operated by Westminster and the Metropolitan Police should be fully integrated with the Hammersmith monitoring facility, supported by a sustainable long-term funding model.
- Stronger collaboration and intelligence-sharing between the Metropolitan Police, local authorities, and businesses, making full use of HOLBA’s data insights to support evidence-led, coordinated action.

² Cumulative Impact Assessment, Westminster City Council, 2023

³ *ibid*

⁴ HOLBA Analysis across tracked social media channels which include X, news sites, reddit, blog, forums and Linked In

⁵ CrimeRate, 2 November 2024, Westminster Crime and Safety Statistics | CrimeRate

Transport and Connectivity

A strong, accessible, and reliable transport network is essential to the West End's economic success, enabling access for its millions of visitors and the many workers commuting from outside Greater London. As travel patterns evolve post-pandemic, investment in transport must adapt to support growth and the 24-hour economy.

HOLBA is therefore calling for:

- An extra hour across all tube networks that service the West End and expansion of the Night Tube to Thursday evenings, which would support changing work patterns and the growing night-time economy.
- Improved aesthetics and the retail offer at key West End stations such as Piccadilly Circus and Leicester Square in addition to step-free access to ensure inclusivity for all visitors and workers.
- Fast-tracked regulation and enforcement for pedicabs, alongside investment in safer borough roads and new cycling routes to deliver Vision Zero and Healthy Streets targets.

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

The need for a unified licencing and planning strategy

HOLBA welcomes the recent announcement of a new pilot scheme that will empower the Mayor of London to take decisions about licensing in key areas. This marks an important step toward evolving how critical issues such as planning and licensing are addressed. However, if the MDC is to fully succeed—not only in supporting Oxford Street but in delivering meaningful regeneration across the wider West End—it is essential that planning and licensing functions are aligned.

Currently, a fragmented regulatory approach continues to constrain growth—particularly within the evening and night-time economy. Licensing restrictions, including cumulative impact zones, have limited the clustering of venues and constrained innovation, undermining the development of a thriving and diverse Experience Economy. A more integrated approach would provide a coherent, flexible, and responsive framework to manage the West End's unique mix of commercial, cultural, and leisure activity.

Crucially, the regulatory regime must reflect the West End's distinct status as a world-leading destination and create the conditions for businesses to invest and grow, while being mindful of the needs of those who live and work in the area. Unified planning and licensing powers would help ensure the MDC can deliver on its full potential—supporting not just Oxford Street, but the entire West End as a globally competitive and inclusive district.

Additionally, greater clarity is also needed on how ringfenced funds—such as those secured through planning applications within the MDA—will be allocated. In particular, we seek assurances that funding will be directed not only to Oxford Street but also to surrounding areas of the West End that will be directly impacted by development activity. A clear and inclusive funding strategy will be essential to supporting regeneration and managing the ripple effects of investment beyond the MDA boundary.

Business Rate reform

HOLBA welcomes the principle of the MDC having the power to grant discretionary non-domestic rate relief as a tool to support businesses, as rising business rates present a growing challenge for many operators, particularly in the experiential sector, where high overheads and complex fit-out requirements add to financial pressure. However, HOLBA advocates full reform of the current business rates system with the tax burden shared with online businesses.

Our new 'Fairer Business Rates' campaign (launched in April) opposes the Government's current plans to reform business rates that will see additional multipliers on properties with a rateable value over £500k (from April 2026). This will disproportionately impact central London and severely risks undermining recovery and limiting future growth. We would like to see the introduction of a new Combined Business Rate that would cut business rates for all and implement a new digital business rate.

A Co-Ordinated Economic Development Strategy

To fully unlock the West End's economic potential—including a further £1.5 billion in the night-time economy⁶—HOLBA advocates for a coordinated economic development strategy that places the experience economy at its core.

- Current planning policies and licensing processes do not reflect the scale of ambition shared by key stakeholders across the Heart of London area. To address this, HOLBA is currently developing the evidence base and proposition for designating key areas as a Special Area for Commerce and Experience within The London Plan and The City Plan. This designation would formally recognise the West End's unique economic and cultural significance, provide greater planning flexibility, and unlock additional licensing powers and resources to support and grow its 24-hour economy.
- HOLBA encourages the Mayor to explore additional levers to support regeneration within the Oxford Street MDC, including the potential reintroduction of VAT-free shopping to boost visitor spend and enhance the area's global competitiveness
- HOLBA also recommends the development of a formalised Experience Economy Growth Plan within the MDC's remit. This plan will align with the ambitions of the London Growth Plan and should set clear priorities, actions and investment strategies to strengthen the West End's position as a world leader in retail, leisure, hospitality, and culture—ensuring the area attracts new businesses, visitors, and talent in a competitive global market.

⁶ Evening and Night time Vision, Strategy and Action Plan, Publica, 2023

The composition of the MDC's board and planning committee

HOLBA welcomes the establishment of both the MDC Board and Planning Committee(s) as important steps toward coordinated leadership and delivery across the West End and requests a seat on the MDC Board.

Greater clarity is needed on the appointment process and composition of Mayoral appointees to both the Board and Committee. Individuals that have relevant expertise in placemaking, regeneration, and the experience economy should be included.

As the Mayor's proposal acknowledges, each MDC must respond to the distinct needs and character of its location. Given the West End's role as a global hub for culture and the Experience Economy, HOLBA recommends establishing a dedicated Culture and Experience Economy sub-committee alongside the main MDC board. This group—made up of BIDs, cultural venues, hospitality businesses, and other stakeholders—would advise on cultural investment and placemaking to support the sustainable growth of the West End's world-leading Experience Economy.

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**

Pedestrianisation of Oxford Street

HOLBA has developed over 40 cycling, walking and public realm projects aimed at transforming and enhancing the public realm and visitor experience in the West End. We therefore support the principle of pedestrianisation for Oxford Street but further detail is needed to understand the potential impact on transport and access.

The MDA proposal does not yet set out specific arrangements for traffic, parking, servicing or access for buses and taxis—all of which could have significant consequences for how businesses operate across the district. Detailed and ongoing consultation needs to be undertaken with businesses in and around the West End as part of any plans for permanent pedestrianisation.

Without it, there is a risk that the proposals could inadvertently undermine the very businesses they aim to help. Furthermore, it is crucial that any improvements do not unintentionally impact on the ability for other streets in the West End to be enhanced in a similar manner in the future. We are particularly concerned about the traffic implications for Charing Cross Road and Piccadilly and do not want to see roads in the wider West End become more congested and polluted.

Other ideas to support the regeneration of Oxford Street

A management and enforcement plan should be developed for Oxford Street to manage demonstrations and key groups such as street entertainers, charity collectors, religious and political groups, and rough sleepers.

Access and management arrangements should fully account for the needs of an ageing population and people with disabilities to ensure Oxford Street's pedestrianisation provides equitable access. Incorporating inclusive design features such as step-free surfaces, seating, tactile paving, clear signage, and proximity to accessible transport links will enhance comfort, safety, and independence, creating an inclusive public realm that benefits everyone.

A full review of how servicing operates across the West End should be undertaken in order to make the most of this opportunity to transform freight and delivery habits in the area. This should include consideration of freight consolidation hubs and support for small businesses to consolidate their deliveries. To ease business concerns around access and logistics while supporting the ambition for a car-lite Oxford Street, the findings of this review should be used to develop a formal servicing and freight strategy.

The London Growth Plan underscores the importance of public realm investment as fundamental to London's success. It states that "the foundations of the London experience are good-quality public spaces and infrastructure, and places that feel safe and secure, day and night." It also highlights that the experience economy depends on local places that "feel safe and clean, with well-designed and maintained public spaces." Transforming the West End's public realm is central to enhancing its vibrancy, accessibility, and global appeal.

HOLBA therefore welcomes the pedestrianisation of Oxford Street in principle, recognising its potential to improve the quality of the public realm and support the wider West End experience. However, to ensure the full benefits are realised, HOLBA is also calling for:

- Targeted funding for pedestrianisation, urban greening, and air quality initiatives throughout the West End, that include HOLBA's plans to transform Charing Cross Road.
- Investment in cycling and walking infrastructure to increase dwell time and economic activity.
- Support for placemaking projects that position the West End as a leader in commerce, culture, and experience. Acknowledging the London Growth Plan's emphasis on the creative industries and the Experience Economy as one of the core drivers of growth in the capital, HOLBA is also calling for targeted public realm investment to realise its ambition of a new dedicated "Arts Quarter" by activating underused spaces in the Heart of London area.
- To support this ambition, HOLBA recommends that a portion of ringfenced Community Infrastructure Levy (CIL) or Section 106 funds be specifically allocated to cultural projects and the activation of underused spaces, recognising the opportunity to bring more spaces into productive, creative use.
- To further enhance placemaking across the West End, HOLBA also recommends developing a network of themed routes or trails across the West End — for example, focused on shopping, theatre, food or heritage — to encourage greater exploration of the area. Such a

network could be supported through private sector partnerships and sponsorships, helping to better connect key destinations and support wider footfall across the district.