



## **Streets and Walkways Sub (Planning and Transportation) Committee**

### **INFORMATION PACK**

**N.B:** These matters are for information and have been marked \* and circulated separately. These will be taken without discussion, unless the Clerk has been informed that a Member has questions or comments prior to the start of the meeting.

**Date:** TUESDAY, 14 MAY 2024

**Time:** 1.45 pm

**Venue:** COMMITTEE ROOM 2 - 2ND FLOOR WEST WING, GUILDHALL

12. \* **BANK JUNCTION IMPROVEMENTS (ALL CHANGE AT BANK): TRAFFIC MIX AND TIMING REVIEW CONCLUSIONS**

**For Information**  
(Pages 3 - 246)

13. \* **PEDICABS (LONDON) BILL 2024**

**For Information**  
(Pages 247 - 248)

14. \* **OUTSTANDING REFERENCES**

**For Information**  
(Pages 249 - 250)

**Ian Thomas CBE**  
**Town Clerk and Chief Executive**

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# Agenda Item 12

Committee(s): Streets & Walkways Sub Committee – For information Planning & Transportation Committee – For decision	Dated: 14/05/24 16/05/24
<b>Subject:</b> Bank Junction improvements (All Change at Bank): Traffic mix and timing review conclusion	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	Vibrant Thriving Destination Flourishing Public Spaces
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain’s Department?	
<b>Report of:</b> Interim Executive Director Environment	Streets and Walkways Sub-Committee - <b>For Information</b> Planning and Transportation Committee - For Decision
Report author: Gillian Howard and Bruce McVean, Policy and Projects, City Operations	

## Summary

In April 2022 the Court of Common Council requested a review of the nature and timing of the traffic restrictions at Bank Junction.

The Court Motion asked the Planning & Transportation Committee to consider options and present it with a recommendation as soon as practicable.

The report provides the Planning & Transportation Committee with the information it needs to make a recommendation to the Court on whether to pursue a change to the restrictions.

The report has been informed by analysis of taxi availability and journey times (Appendix 2). The findings from this include:

- The Bank restrictions were found to have little or no impact on most journey times and costs for the routes sampled.
- At times, there is very limited ability to hail a taxi on some streets leading up to Bank.
- There is good availability of both taxis and private hire vehicles in the Bank area and City-wide throughout the day via ride hailing apps.

The equality impacts of the restriction and potential changes to it are assessed in the Equalities Impact Assessment (EqIA, Appendix 3). The EqIA recognises that there are both positive and negative impacts associated with the current restriction.

The EqIA concludes: **“The additional research undertaken on taxi availability, journey times, and journey costs suggests that, as a whole, the restriction of taxi access through Bank junction between the hours of 7am to 7pm has not**

**led to any extensive negative impacts on equality, and the impacts of the restrictions outside of these hours is deemed to be negligible.**

**“However, it is important to acknowledge that there have been some negative impacts for certain individuals, particularly those that are most reliant on taxis as an essential mobility aid, such as some disabled people, older people with age-related mobility impairments, and pregnant women”.**

Concerns about the impact of taxis being restricted from using Bank junction on the City’s reputation as a business destination have been raised in previous debates.

Several Ward Motes recently passed resolutions supporting a change to the restriction at Bank to allow taxi access.

There is mixed anecdotal evidence on the economic impact of the taxi restrictions.

There is a clear strength of feeling amongst taxi drivers and passengers for a change at Bank.

The review of the traffic restrictions has found no strong transport grounds for making a change to the restrictions to allow taxis during restricted hours.

The original objective of the changes at Bank to address the junction's safety record has also been achieved and the data shows the current scheme has reduced collisions to virtually nil (one collision in the 11 months up to Nov 2023; paras 51 and 52).

However, Members may still wish to pursue a change based on remaining equality concerns for those most reliant on taxis as an essential mobility aid and considering the anecdotal evidence of the economic impacts the Bank restrictions and their effect on the perception of the City as a business centre and visitor destination.

Any changes to the restrictions at Bank require an application to TfL under the Traffic Management Act Notification (TMAN) process. A full traffic model audit from TfL will be required before a TMAN application can be made and considered. The next steps, should Members agree to pursue a change to the restrictions at Bank, are provided in Appendix 4.

### **Recommendation(s)**

- Members of the Streets & Walkways Sub Committee and the Planning & Transportation Committee are asked to note the content of the report, which concludes the review of traffic and timing mix at Bank junction.
- Members of the Planning & Transportation Committee are asked to endorse the findings of the review and to choose an option from below to recommend to the Court of Common Council:
  - Option 1: No change to current restrictions, with Bank junction continuing to operate as it currently does, i.e. bus and cycle only, 7am - 7pm, Monday – Friday, except for access to Cornhill from Princes Street.
  - Option 2: Pursue a change to the restrictions, under an experimental traffic order, to allow taxi access at all times while continuing to restrict other traffic, including private hire vehicles and powered two wheelers, between 7am – 7pm, Monday – Friday, expect for access to Cornhill

from Princes Street. (This is subject to further modelling, design work and approvals).

**The arguments are finely balanced and the evidence is mixed but the Road Traffic Regulation Act 1984 says a Highway Authority has a duty to focus on the expeditious, convenient and safe movement of vehicles and pedestrians. Therefore, because of the significant reductions in collisions and the lack of any strong transport reasons for change, Officers recommend Option 1.**

## **Main Report**

### **Background**

1. 'Taxi' in this report refers to licensed taxis (black cabs) only. Private hire vehicles (minicabs) are considered as part of general traffic. It is possible to restrict access for general traffic while still allowing taxis. Access for powered two wheelers (motorcycles and mopeds) can also be considered separately.
2. A motion approved at the Court of Common Council in April 2022 requested that the Planning & Transportation Committee immediately begin a review of the nature and timing of the restrictions at Bank Junction, considering all options, and present a recommendation to the Court of Common Council.
3. This motion brought forward the planned review of the restriction, given that the Streets & Walkways Sub Committee had previously agreed in September 2021 that this would begin 12 months after the completion of construction, i.e. in spring 2025.
4. In March 2023, the Planning & Transportation Committee agreed that no further work on the option to reintroduce general traffic into Bank would be undertaken. The review has since focussed on assessing the need for changes to the restrictions to allow access for taxis and/or powered two wheelers.
5. In December 2023, the Court of Common Council decided to immediately restart the modelling of the traffic impacts, running this work in parallel with the data collection and analysis to identify and evidence a need for change.
6. Work on the traffic modelling elements is underway and is being conducted in close collaboration with TfL. This work is unrelated to the evidence base for change and is not covered in this report.
7. Any changes to the restrictions at Bank require an application to TfL under the Traffic Management Act Notification (TMAN) process. A full traffic model audit from TfL will be required before a TMAN application can be made and considered.
8. The current 7am – 7pm, Monday to Friday, bus and cycle only restriction at Bank junction was first introduced in May 2017. The primary objective was to improve

safety at the junction, which was a hotspot for collisions, including two fatal collisions in 2012 and 2015.

9. All streets on the approaches to Bank junction can be accessed by motor vehicles, including for pick up and drop off by taxi.
10. The All Change at Bank project is now delivering a transformational change that has significantly increased the amount of space available to people walking and wheeling. Further details on the changes being delivered are provided in Appendix 1.
11. All Change at Bank is nearing the end of its construction phase and is due to be substantively completed in June 2024. Some planting and accessibility improvements to the area outside the Royal Exchange will follow later this year.

### **Current Position**

12. A review of this type is usually informed by an identification of a transport issue or issues that need addressing such as traffic collisions and casualties, volumes of people travelling and the need to reallocate space, equality concerns or air quality.
13. Work up to May 2023 identified the need for further analysis of the equality impacts of making a change to the restrictions at Bank. No other transport related reasons to promote a change to the restrictions at Bank have been identified. Additional data collection and analysis, including the Equalities Impact Assessment (EqIA) has now been completed.
14. In making a decision on whether to change the restrictions at Bank, Members are reminded of their duty as the Highway Authority and that the statutory regime puts the consideration of any traffic (including pedestrians) implications (which would result from a change to any traffic orders) at the forefront of decision making when discharging the City Corporation's duty set out in Section 122 of the Road Traffic Regulation Act 1984.
15. In addition, due regard must be given to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010. The equality duty is to be considered at the time of taking the decision.
16. This report provides the Planning & Transportation Committee with the information it needs to make a recommendation to the Court of Common Council (in its capacity as the Highway Authority) on whether to pursue a change to the restrictions.
17. Collection and analysis of taxi availability data and journey times and costs was undertaken by WSP. Key findings are summarised below, and WSP's full report is provided in Appendix 2.
18. WSP analysed the data through a mix of site-specific analysis and breaking the City of London into four areas: Bank sites, North, East, and West to enable comparisons across different parts of the City. Survey sites and area boundaries are shown in Figure 1.

19. Note that WSP’s data collection took place before the changes to the Cheapside bus gate to allow taxis (under an experimental traffic order) and the installation of the taxi rank on Poultry outside The Ned.
20. The EqIA to inform this review was carried out by Steer. The EqIA considers the benefits and disbenefits for different protected characteristic groups of the potential changes to allow taxis and/or powered two wheelers through the junction during restricted hours. The full EqIA and accompanying Technical Note is provided in Appendix 3.
21. This report concludes the review requested by the Court of Common Council in April 2022. The next steps, should Members agree to pursue a change to the restrictions at Bank, are provided in Appendix 4.

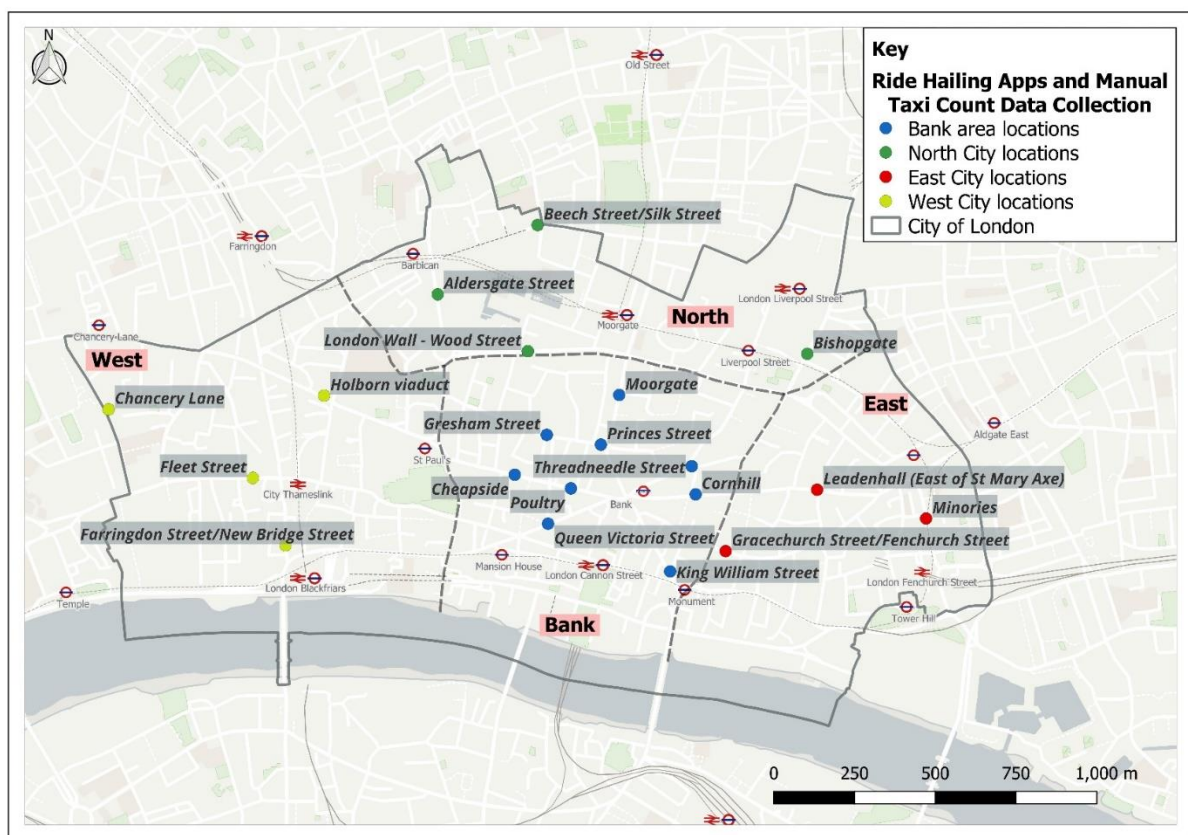


Figure 1: 2023 Taxi availability survey sites and area boundaries

### Travel in the City of London

22. The most consistent and reliable source of data on how people travel to/from and within the City is the London Travel Demand Survey (LTDS). This is a long running annual survey of 8,000 Londoners conducted by TfL.
23. The average mode share for trips originating in the City based on data from 2017/18 - 2019/20 is provided in Table 1. Data for 2022/23, the first full year for which post-pandemic data is available, is also provided.

24. A trip represents the main mode of travel used for a journey. Many trips in the City, especially those made by public transport, will involve some travel by another mode, mainly walking.

Year	Rail	Underground /DLR	Bus	Taxi /other	Car /motorcycle	Cycle	Walk
2017/18 - 2019/20	23.6	31.6	4.5	1.4	2.3*	4.5	32.1
2022/23	20.5	32.4	8.5	2*	1.6	5.5	29.4

Table 1: Percentage of trips per day by mode of travel to the City (LTDS).  
\*Includes private hire vehicles.

25. TfL analysis of London-wide LTDS data<sup>1</sup> found that the most common form of transport used by Londoners was walking. 95% of respondents said they walked at least once a week. The figure is lower for disabled people (81%) and those aged over 65 (87%). 3% of Londoners reported using a taxi at least once a week, with relative consistency across different groups including disabled people (3%) and those over 65 (2%).

26. The TfL analysis also found that for Londoners with lower household incomes (below £20,000) the bus is the second most used form of transport after walking. Compared with 59 per cent of all Londoners using the bus at least once a week, 69 per cent of people with lower household incomes take the bus. 2% of people from households with lower incomes reported using a taxi at least once a week.

27. A table summarising the travel modes used by different communities is provided in Appendix 5.

## Taxi availability and trends

### Taxi rank usage

28. Data collected by WSP found that most of the 30 ranks across the City are lightly used by taxi drivers, with only a small number very well used across the day. WSP's findings include:

- 2002 taxis were recorded across 30 ranks over 24 hours.
- Liverpool Street station has the highest recorded number of taxis across the day (879). This rank operates differently to the other ranks in the City as it operates near the station exit as a continuous feeder rank.
- Excluding Liverpool Street station there is little difference between rank usage by geographical area. What appears more important in terms of rank usage is

<sup>1</sup> [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk)



the proximity of the rank to key attractors such as stations, tourist destinations and hotels.

- Across all sites, 30% of taxis left the rank without picking up a passenger.

### Taxi availability via ride hailing apps

29. WSP's analysis of the availability of both taxis and private hire vehicles through ride hailing apps found minimal variations in wait times across the City. The average wait time via the ride hailing apps was found to be 4 minutes 11 seconds for a taxi and 3 minutes 20 seconds for a private hire vehicle. For both private hire vehicles and taxis, the wait times in the Bank area were within 20 seconds of the overall average, as can be seen in Figure 2.

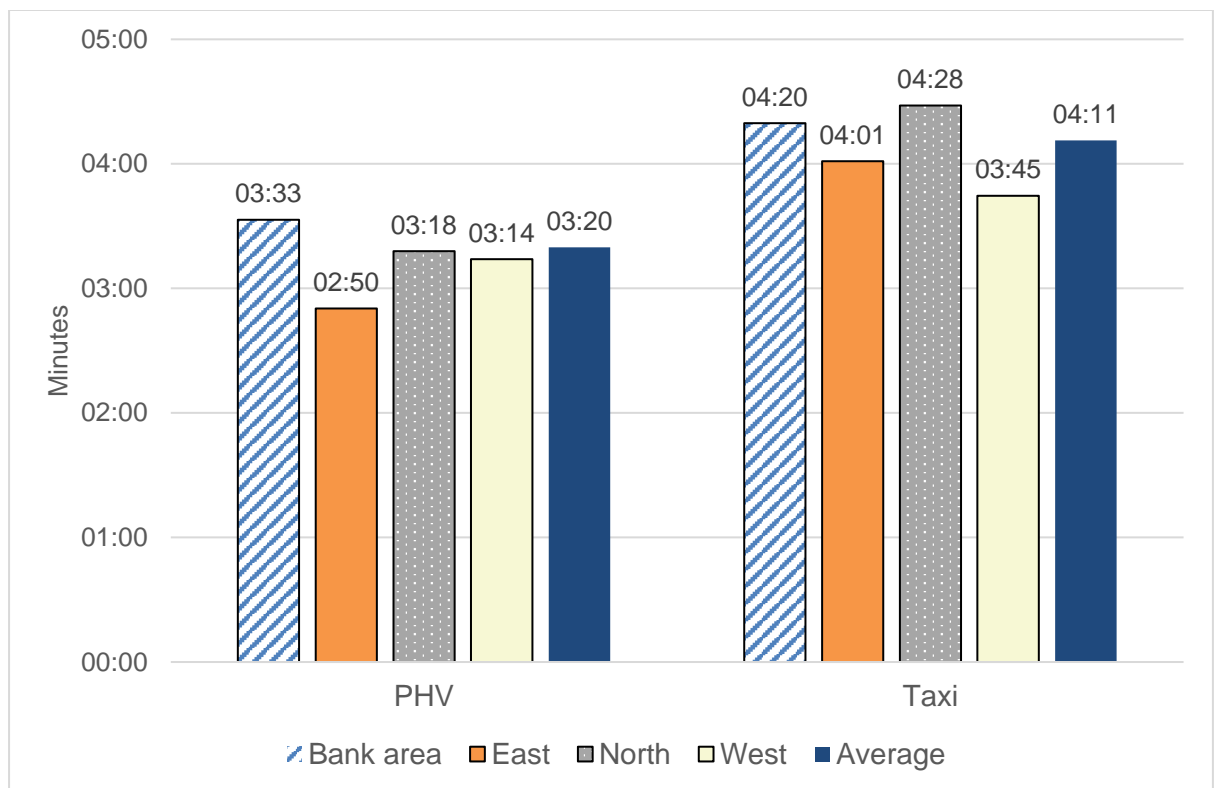


Figure 2: Average wait time for a private hire vehicle or taxi split by area based on ride hailing app data (7am to 1am on a weekday)

30. While this exercise did not take account of drivers not accepting requests or cancelling accepted requests, the data suggests that throughout the day there is good availability of both taxis and private hire vehicles via ride hailing apps, and that the Bank restrictions have no significant impact on these.

31. In relation to taxi availability via apps, Steer commented that: "Though there was little variation in taxi and private hire vehicle wait times across the [City], Poultry and Cornhill were within the top three locations with the highest average taxi wait times across all the sites surveyed". Steer also summarised that "The analysis shows that the average wait time for taxis and private hire vehicles in the Bank

junction area is not significantly higher when compared to the rest of the [City] (Approximately +13 seconds for private hire vehicle users, and +10 seconds for taxi users). Overall, this difference in average wait time is not considered to disproportionately impact [disabled people, older people with mobility impairments due to ageing, or pregnant women with acute mobility impairments].”

### Taxi availability on-street

32. WSP undertook manual taxi count surveys to record the number of taxis passing the survey location in both directions, whether they had their lights on (available to hire) or off (not available to hire).
33. Looking at the approach arms to Bank, the data shows that there are times when there is very limited ability to hail a taxi. The surveys counted several occasions when there were no or only one or two available taxis in an hour on these streets. There are significantly fewer taxis on Cornhill, Poultry, King William Street and Queen Victoria Street with their light on throughout the day (7am to 1am) compared to the other sites. Details are provided in Table 3-3 in the WSP report (Appendix 2). This data collection took place before the changes to the Cheapside bus gate to allow taxis and the installation of the taxi rank on Poultry outside The Ned.
34. This pattern is largely to be expected given the timing of the restrictions at Bank. It is also in line with the classification of these streets in the City of London Street Hierarchy as local access streets, i.e. primarily used for the first or final part of a journey, providing access for vehicles to properties.
35. Additional analysis of taxi numbers from the City Corporation’s strategic traffic counts suggests that taxi volumes on the approaches to Bank are comparable with similar local access streets. See Appendix 6 for further details.
36. Concerns have previously been raised about reduced taxi availability in the evening and the link with the daytime restrictions at Bank junction. The extent to which the restrictions at Bank may impact on the availability of taxis in the evening is unclear.
37. The WSP analysis found that taxi availability increases on King William Street from 7pm and Princes Street from 4pm. Analysis of the City Corporation’s strategic traffic counts for King William Street and Poultry also shows an increase in taxi numbers after 7pm, although the volumes are significantly lower in 2022 than they were in 2017 and 2019. See Figure 3 for more details.

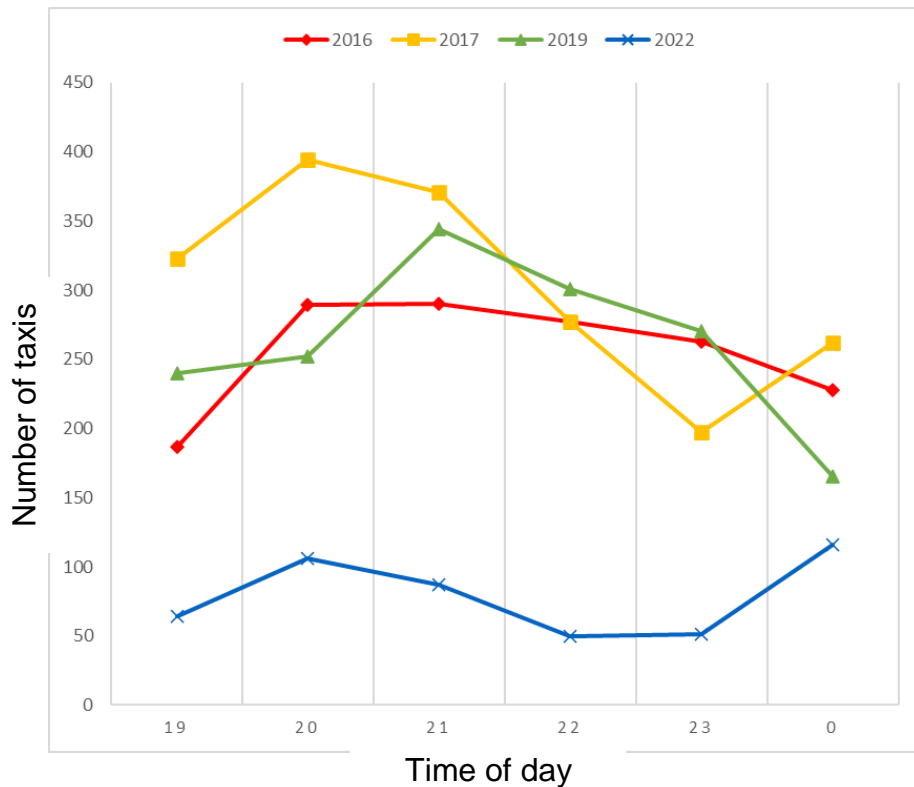


Figure 3: Total taxi numbers on King William Street and Poultry, 7pm – 1am between 2016 and 2022.

#### Wider trends in taxi numbers

38. Taxi numbers have been falling in the City and central London for several years. The number of licensed taxis and drivers has also fallen over this time. These wider trends may limit the extent to which any changes to the restrictions at Bank will increase the availability of taxis in the Bank area and more generally.
39. WSP analysis found that across 17 sites (shown in Figure 1) in the City, overall taxi numbers reduced from 56,450 taxis counted in 2016 to 23,307 taxis in 2023 (7am – 1am). A 59% decrease across this sample of sites.
40. Taxi numbers counted in the City Corporation’s strategic traffic counts (15 sites, 7am – 7pm) are shown in Figure 4 below. Between 2016 and 2022 there was a 21% drop in taxis counted.

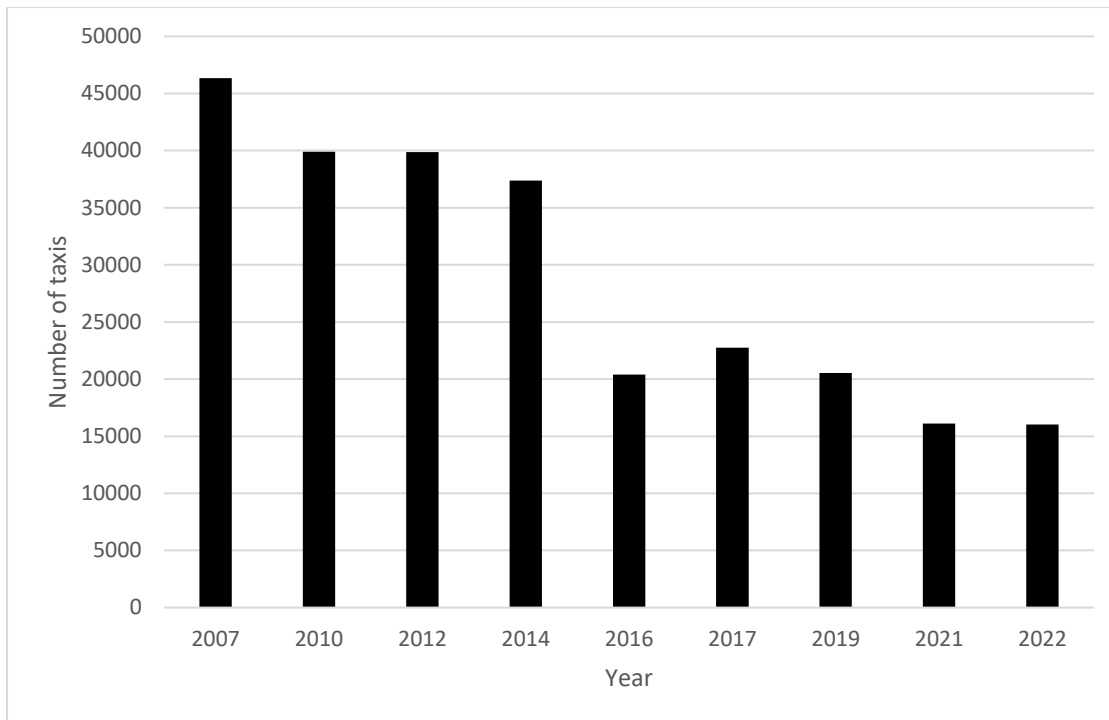


Figure 4: Taxi numbers counted at 15 sites between 7am and 7pm

41. The number of taxis recorded entering the Congestion Charge Zone (during charging hours) fell by 55% between 2016 and 2023.
42. The number of licensed taxis drivers with an All London licence, which includes the City, has also reduced significantly over this time from 21,274 in 2016/17 to 16,327 in 2022/23, a 24% drop. The latest data from TfL suggests that this trend is continuing, with 15,608 All London licences recorded in March 2024, a 4% reduction compared to 2022/23<sup>2</sup>.
43. As part of their analysis WSP compared data on taxi numbers provided by Westminster City Council with data for the City. This comparison, set out in Table 2, suggests that drops in taxi volumes are not unique to the City, or in particular the Bank area.

	2017	2022/23	Absolute change	% change
Oxford Street	6389	4729	-2660	-26%
Regent Street*	965	525	-440	-46%
Bank area	4846	2840	-2006	-41%
Rest of City	5457	3999	-1458	-27%

<sup>2</sup> <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/licensing-information>

Table 2: Taxi number comparison between 2017 and 2022/23 for sites in the City of London and Westminster (peak hours, approx. 08:00-10:00, 12:00-14:00, 17:00-19:00). \*Regent Street sites peak hour counts were for one hour only.

### **Journey times and costs**

44. WSP undertook journey time surveys for four routes:

- a) Southwark Street to Silk Street (via London Bridge)
- b) Whitechapel High Street to Blackfriars Station
- c) Fenchurch Street Station to Giltspur Street
- d) Liverpool Street to Queen Street

45. For each of these, the driving time was recorded in both directions using the quickest route provided by the Waze satellite navigation app and the most direct route via Bank (and where appropriate via Bishopsgate). The cost of this journey was then calculated based on distance travelled and time taken. The time required to make the equivalent journey by public transport and step-free public transport was calculated using TfL's Go app.

46. Overall, there was little difference in journey time or cost between routes via Bank and routes provided by Waze. The most significant journey time difference was for Southwark Street to Silk Street (over 5 minutes quicker via Bank), although in the southbound direction Waze provided the quicker route. Southwark Street to Silk Street was also the only route where travel by taxi took longer than travel by public transport.

47. This analysis is based on a sample of routes, and it is impossible to assess every potential route combination. There will be some taxi journeys that are made longer because of the Bank restrictions. However, the results suggest that changing the restrictions at Bank may not have a significant impact on journey times and costs for taxi journeys.

### **The impact of changing the restrictions at Bank on project objectives**

48. The project objectives for All Change at Bank are:

- Continue to reduce casualties by simplifying the junction
- Reduce pedestrian crowding levels
- Improve air quality
- Improve the perceptions of place

49. The extent to which changing the restrictions at Bank to allow taxis or powered two wheelers will impact on these objectives depends on the number of additional vehicles that ultimately use the junction. At this stage this is an unknown quantity. Numbers will become clearer as we progress with traffic modelling and clearer still if an experimental scheme is implemented. With this uncertainty in mind, the potential impacts on each of the project objectives is considered below.

### Continue to reduce casualties by simplifying the junction

50. Changing the restrictions at Bank to allow taxis or powered two wheelers will increase the number of vehicles travelling through the junction and associated turning movements. This increase will happen when the area is busiest with people walking, wheeling and cycling. This adds complexity and is likely to increase the risk of a collision and potential for conflict, and impact on perceptions of safety. This risk may be mitigated by the recent changes to layout and pavement widening delivered by the All Change at Bank project.
51. Casualty figures for the Bank area are summarised in Table 3 below. These indicate that the current restrictions have contributed to a reduction in the number of collisions in and around Bank junction. The latest date for which verified data is currently available is 30 November 2023.

Year	2014 – 2016 (avg)	2017 (restriction introduced in May 2017)	2018 – 2021 (avg, excluding 2020)	2022	2023 (to 30 November)
Casualties	14	13	9	3	1

Table 3: Number of casualties (all severity) in the Bank area, 7am – 7pm.

52. In 2023 (up to 30 November), there were no recorded collisions or casualties within the junction itself, at any time. One collision/casualty has been recorded on the periphery, on Cornhill near Birchin Lane. This occurred within the restricted times. Note that this time period overlaps with the construction of All Change at Bank. Further detail can be found in Appendix 7.
53. City-wide, between January 2019 and November 2023 there have been 192 casualties from collisions recorded as involving a taxi (including private hire vehicles) and 66 from collisions involving powered two wheelers<sup>3</sup>. Over the same time there were 320 casualties from collisions involving a car and 117 from collisions involving a pedal cycle. Note that both car and taxi figures could include private hire vehicles and it is not possible to put a precise figure on the number of collisions that involve a taxi.

### Reduce pedestrian crowding levels

54. The new layout of Bank junction provides a significant increase in the amount of space available for people walking and wheeling. Changing the restrictions to allow taxis or powered two wheelers does not require any changes to this. There will be no impact on pedestrian crowding levels on pavements. There may be an increase in crowding at crossings if longer wait times are required to accommodate the increase in traffic.

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<sup>3</sup> TfL Road Safety Data Reports

### Improve air quality

55. On average during 2023 NO<sub>2</sub> levels at monitoring sites at Bank junction were below the legal limit (40 µg m<sup>-3</sup>) and have been since 2022, when all sites monitored in the wider area were below the legal limit for the first time. While changing the restrictions to allow taxis or powered two wheelers will increase the number of motor vehicles using the junction this is unlikely to have a significant impact on air quality. Approximately 50% (December 2023) of the taxi fleet is now zero emission capable and all new taxis are required to be zero emission capable. Any increase in NO<sub>2</sub> or particulates is likely to be negligible in comparison with background levels.

### Improve the perceptions of place

56. All Change at Bank has delivered a high-quality public realm at Bank junction, with wider pavements and new public spaces incorporating seating and greening. This is complemented by very low traffic levels during the day, reducing traffic dominance, albeit with buses still travelling through the junction.

57. It is likely that increasing the number of motor vehicles using the junction will have some negative impact on the experience of people spending time in the area.

### **The impact of changing the restrictions at Bank on different modes of travel**

58. The extent to which changing the restrictions at Bank to allow taxis or powered two wheelers will impact on different modes of travel will depend on the number of vehicles that ultimately use the junction. As noted above, this is an unknown quantity, but the potential impacts are considered below based on the feasibility traffic modelling undertaken last year. This is based on vehicles being given the same access as buses which would be the most impactful change.

59. Note that the modelling area for Bank (Appendix 8) includes approximately 30 signalised junctions and a further 27 priority junctions/signalised crossings and covers a number of streets beyond the immediate vicinity of the junction. The impacts of any changes to the restrictions may be felt within this wider area.

60. Taxis: If taxis were permitted, some taxi journeys would be quicker and cheaper, and it may be easier to hail a taxi both on-street and through ride hailing apps on the approaches to Bank. There may be some delays to taxis within the wider area on some routes, depending on changes to traffic movements and signal phasing changes to accommodate the change at Bank. It is also possible that some other areas see a decrease in the number of taxis available as vehicles divert towards Bank. The introduction of just powered two wheelers at Bank would do little to impact or benefit people travelling in taxis.

61. General traffic: There may be some delays to general traffic within the wider area, depending on changes to traffic movements and signal phasing. There is also the possibility of minor journey time improvements with taxis or powered two wheelers diverting to Bank from the wider area.

62. Powered two wheelers: If only taxis were allowed through Bank, then there may be some delays within the wider area, depending on changes to traffic

movements and signal phasing. Although this is likely to be less so for powered two wheeler riders who can, if safe, move to the head of the traffic queue. There is also the possibility of minor journey time improvements with taxis diverting to Bank from the wider area. If powered two wheelers were allowed through Bank, some journeys for powered two wheeler riders would be quicker. There is likely to be some reduction in risk of a collision for riders in comparison to other routes that previously would have been taken and which have more vehicles on them. However, there remains a risk of a collision when travelling through Bank.

63. Walking and wheeling: There are likely to be negative impacts for people walking and wheeling both at Bank junction and in the wider area. These could include increased waiting times and crowding at crossings, reduced ease of crossing, increased risk of collisions, lower perceptions of safety and a reduction in the experience of walking, wheeling and spending time on street. At Bank specifically, to minimise the impact on bus journey times if taxis were to be introduced, it is likely that waiting times at crossings would increase to accommodate the increased traffic flow.
64. Cycling: There are likely to be negative impacts for people cycling, or considering cycling, both at Bank junction and in the wider area with the introduction of more motor vehicles. These could include increased traffic on streets such as King William Street that are currently very lightly trafficked at the times when they are busiest with people cycling. This may result in traffic levels exceeding those that are acceptable (per TfL and DfT guidance) for streets without dedicated cycle infrastructure. This in turn may result in an increased risk of collisions and lower perceptions of safety. There may be some delays to people cycling at Bank junction and within the wider area, depending on changes to traffic movements and signal phasing. Specifically at Bank, if the signal time is extended to accommodate the increased flows of traffic, this would increase the amount of time people cycling will have to wait at the traffic signals. Conversely, there may be some benefits for people cycling on those corridors in the wider area where vehicles have diverted away from them.
65. Buses: There may be some delays to buses at Bank junction and within the wider area, depending on changes to traffic movements and signal phasing. The impact on buses is expected to be worse if taxis, or taxis and powered two wheelers, were to be allowed through the junction. This is likely to result in the need to extend the signal time phasing at Bank. The impact on bus passengers is expected to be minimal if only powered two wheelers were permitted.

### **Other considerations**

66. In line with usual process, consultation will be undertaken if a decision is made to pursue a change to the restrictions, most likely while an experimental traffic order is in place. As such, the views of City businesses, workers, residents, visitors and other stakeholders will be sought at that time.
67. Past consultations for All Change at Bank and other projects suggest the views of taxi drivers and taxi passengers can be significantly different to the views of people who travel by other modes.



68. Concerns about the impact of taxis being restricted from using Bank junction on the City's reputation as a business destination have been raised in previous debates. Several Ward Motes recently passed resolutions supporting a change to the restrictions at Bank to allow taxi access.
69. Similar concerns have been raised in correspondence from the City of London Chamber of Commerce who noted that excluding taxis from Bank junction during the day "continues to damage the international perception of our City as a welcoming and accessible business and tourism centre." The Chamber of Commerce also raised concerns about the impact of the restrictions on disabled people. Their full correspondence is provided in appendix 9.
70. Other correspondence received by officers include a response from the Royal Exchange, the City Property Association (CPA) and The Ned hotel also contained in appendix 9.
71. The Royal Exchange mention that they are a "luxury retail destination in the heart of the City with a number of food and drink operators open until 11pm as well as events such as weddings and parties over the weekend, it is vital for our customers to be able to book and hail taxis to pick them up from outside The Royal Exchange...Allowing taxis through Bank Junction would alleviate that issue and ensure the continued success of The Royal Exchange and others around it."
72. The CPA reiterated their support for the All Change at Bank project "...we strongly welcome suggestions to explore restrictions on vehicular traffic, including taxis, on a case by case basis. We urge the continuation of these restrictions at Bank Junction which has only very recently seen the completion of its long planned public realm works. Whilst we understand a very small number of people feel this is inconvenient, we would urge the City to take into consideration wider views and give the newly delivered scheme more time to bed in. Whilst it is not as ambitious as we would have liked to have seen delivered, it is still transformative for the area and rowing back now the junction is operational would be a retrograde step after 6+ years of the current restrictions."
73. The Ned hotel "fully support restricted access for lorries and other commercial / logistic vehicles in addition to personal vehicles, during the hours of 7am – 7pm, Monday to Friday", however "**do not** support, nor do I understand the rationale for restricting registered London taxis (Black Cabs) during these hours. As the records show, there has never been a fatality recorded on Bank Junction as a result of a collision with a taxi and therefore it is hard to justify that these vehicles pose a high safety risk".
74. The strength of feeling amongst taxi drivers and passengers for a change at Bank is evidenced by the Cabs Across Bank campaign receiving almost 600 responses (as of February 2024) to its request for feedback from drivers and passengers.
75. The Cabs Across Bank campaign provided Steer with approximately 200 responses from their call for feedback. This sample was considered by Cabs Across Bank to be the most relevant for the purpose of the EqIA.
76. Steer linked the comments made to the following four protected characteristics:
- Age (older people)
  - Disability

- Pregnancy and Maternity
- Sex

77. The concerns raised include “decreased taxi availability, increases in time for taxi journeys and longer routes, plus corresponding increase to taxi fares and decreased safety as a result of less passive surveillance from vehicles. A more general concern is that taxi use is relied upon for essential mobility across protected characteristics”. These concerns were already a consideration for the EqlA.
78. Steer’s review focused on the themes raised within the responses. It was not possible to indicate frequency of concern due to not having the full data set. It was also not always possible to differentiate if a respondent was a taxi driver or passenger.
79. The number of City workers has continued to grow in recent years, with 615,000 workers in the City of London in 2022<sup>4</sup>. This number has increased from 542,000 in 2019. Growth is anticipated to continue with approx. 840,000sqm of office floorspace currently under construction (February 2024).
80. Infrastructure provision for people using public transport, walking, wheeling and cycling will need to respond to this growth to ensure the comfort and safety of people living, working and visiting the City. However, this expected growth has not been factored into this review as the layout of Bank junction does not need to change.

### **Powered two wheelers**

81. The Court of Common Council motion requested that this review consider “all options”.
82. The option to potentially allow all motor traffic during restricted hours was ruled out in March 2023. This was based on the feasibility modelling clearly indicating significantly detrimental traffic impacts if general traffic was reintroduced at all times. These included implications for bus journey times and for general traffic travelling on London Wall.
83. The option to potentially allow powered two wheelers (motorcycles and mopeds) through Bank during restricted hours remained under consideration.
84. The feasibility modelling found that allowing powered two wheelers would not result in journey time delays to buses. This is partly because powered two wheelers make up only a small proportion of traffic (approximately 5%). They also take up less space on the carriageway and can line up next to each other if at the front of the queue. This limits the impact on the amount of time needed within the green phase of the traffic signal. Conversely taking some motorcycles from other routes doesn’t make a significant difference to other traffic journey times.
85. The EqlA highlights that permitting powered two wheelers would “increase traffic through Bank which may make it more difficult for some people to informally cross the road and therefore may reduce real or perceived road safety”. This option was summarised as likely to have a limited impact on equalities, with the

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<sup>4</sup> [City of London factsheet March 2024](#)

“continued restriction to most motor traffic from the junction is likely to retain the benefits for road safety and air quality, disproportionately benefitting younger and older people, disabled people and pregnant women”.

86. Allowing taxis and powered two wheelers would have the greatest negative impact on equalities, “greater access for vehicles will see greater negative impact upon road safety and air quality, impacting younger and older people, disabled people and pregnant women.”
87. There is also likely to be an increase in noise with the acceleration of powered two wheelers which may impact on the enjoyment of the space.
88. From a risk perspective, allowing powered two wheelers through the junction is likely to increase the risk of a collision given the high volume of people walking and cycling in this area and the very different speeds that these three modes are able to reach. Analysis of collision data to inform the development of the Vision Zero Action Plan found that people riding motorcycles pose the highest risk to others relative to their share of traffic.
89. Powered two wheeler riders are a vulnerable road user and across the City in the three years of 2020 to 2022 accounted for 16% of all casualties.
90. While the junction is used by buses, the narrowed carriageway and the volume of people cycling keeps the bus speeds across the junction relatively low. Powered two wheeler riders are more likely to be able to gain speed across the junction and into the approach arms, where there is greater informal crossing by people walking. With the relatively low trafficked approach arms, there is an increased risk of exceeding the speed limit on the approach to or from Bank which increases risk of seriousness of injury if there were a collision.
91. There may be an argument that powered two-wheeler riders would be safer going through Bank because there are fewer motor vehicles, but the potential conflict with the large volume of people walking and cycling in this space increases the risk of injury to all three modes. It is considered that the negative impact associated with the increased risk of collisions outweighs the potential journey time benefit to powered two wheeler riders.
92. Fundamentally, there are only benefits to individual riders in terms of possible journey time benefits on some routes, and the argument for permitting this mode of travel on accessibility grounds is weak.
93. It is recommended that no further consideration is given to potentially allowing powered two wheelers to travel through Bank during restricted times.

## **Proposals**

94. The proposed options for Members are:
  - Option 1: No change to current restrictions, with Bank junction continuing to operate as it currently does, i.e. bus and cycle only, 7am - 7pm, Monday – Friday except for access to Cornhill from Princes Street.
  - Option 2: Pursue a change to the restrictions, under an experimental traffic order, to allow taxi access at all times while continuing to restrict other traffic, including private hire vehicles and powered two wheelers, between 7am –

7pm, Monday – Friday, expect for access to Cornhill from Princes Street.  
(This is subject to further modelling, design work and approvals)

95. The review has found no transport grounds or strong equality grounds for making a change to the restrictions to allow taxis during restricted hours. However, Members may still wish to pursue a change based on remaining equality concerns for those most reliant on taxis as an essential mobility aid and considering the anecdotal evidence of the economic impacts the Bank restrictions and their effect on the perception of the City as a business centre and visitor destination.
96. If Option 2 is agreed, then changes to the restrictions to allow taxis would first be introduced under an experimental traffic order. There is still uncertainty around the number of taxis that will take advantage of a change to the restrictions. Taxis have not been able to travel through Bank during restricted hours for seven years. As such, traffic modelling to assess the impacts of a change to the restrictions cannot fully predict the potential traffic impacts.
97. Using an experimental traffic order offers the opportunity to monitor the change in action against agreed outcomes, such as taxi availability, and identify any potential impacts before making a permanent change. In the event of any significant unanticipated negative impacts on journey times, etc the experiment could be stopped.
98. Public consultation would be carried out once the experimental traffic order is in place. This will allow a change to be introduced more quickly.
99. An experimental traffic order will still require an application to TfL under the Traffic Management Act Notification (TMAN) process. A full traffic model audit from TfL will be required before they would consider a TMAN application.
100. The traffic modelling may identify impacts that require mitigation, such as changes to signal phasing, or limit the choice of routes that can be made available to taxis.
101. Future decisions on the experimental traffic order, including the decision to implement a change following the traffic modelling and any decision on whether to make the experimental order permanent in due course, would be taken by the Planning & Transportation Committee, with delegation to the Streets & Walkways Sub Committee as appropriate.
102. No change to the timing of the restrictions is proposed. Weekend footfall remains significantly below weekdays and there is not enough evidence to suggest that change to the hours of operation is necessary or appropriate. This does not prevent a change in the future.

## **Corporate & Strategic Implications**

### Strategic implications

103. By providing more space for walking and wheeling, reducing motor traffic, making the City's streets safer and more accessible and enhancing the public realm the All Change at Bank project contributes to the Vibrant Thriving

Destination and Flourishing Public Spaces outcomes of the Corporate Plan. The project also contributes to the delivery of the Transport Strategy, Climate Action Strategy and Destination City initiative.

104. The project will continue to contribute to the delivery of these outcomes and strategies if the restrictions are altered, although the extent of the contribution may change. As noted above, changing the restrictions is likely to negatively impact on the experience of walking, wheeling, cycling and spending time at Bank junction while improving accessibility for some people who rely on taxis.

#### Financial implications

105. To date, approximately £277,000 has been spent/committed to complete this review and on early stages of the traffic modelling. This leaves a balance of £327,000.
106. If it is decided to proceed with Option 1, the remaining funds will be returned to the On Street Parking Reserve (OSPR) and made available for other projects.
107. If it is decided to proceed with Option 2, the remaining funds are estimated to be enough to reach the final decision to proceed with an experimental scheme including developing the monitoring strategy and success criteria and submitting the TMAN application to TfL. Most of this expenditure will be for progressing the necessary traffic modelling and subsequent application to TfL.
108. It is likely that some additional funding will be required to fund the monitoring and run the consultation for the experiment. The detail of this is unknown at this stage. A future bid for OSPR funding will be submitted as required.

#### Resource implications

109. If Option 2 is chosen there is the possibility of requiring more internal resource than is currently available. Consideration as to how this is managed, for example by reprioritising other work or through additional consultancy support, will be required following the decision on how to proceed. Additional resource may be required within the parking enforcement team to implement and manage the change to the enforcement of the restrictions for the experiment.
110. It should also be noted that progressing the traffic modelling work with TfL requires them to have sufficient staff resource to undertake their assessment and audits. This risk has been raised with TfL to ensure they seek to address it. The capacity of the traffic modelling consultant would also be required.

#### Legal implications

111. In exercising the City Corporation's functions as traffic authority and taking a decision on the review, the City are required to comply with the duty in Section 122 of the Road Traffic Regulation Act which requires the traffic authority, in exercising its traffic authority functions, to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), so far as practicable having regard to:

- (a) the desirability of securing and maintaining reasonable access to premises.
- (b) the effect on the amenities of any locality affected.
- (bb) national air quality strategy.
- (c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
- (d) any other relevant matters.

112. Under Section 16 of the Traffic Management Act 2004 the City Corporation as the local traffic authority has a duty to manage its road network with a view to achieving, so far as may be reasonably practicable having regard to its other obligations, policies and objectives, the objectives of (a) securing the expeditious movement of traffic on the authority's road network and (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.

113. Under Section 149 of the Equality Act 2010 the public sector equality duty requires public authorities to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity and
- Foster good relations between those who share a protected characteristic (i.e., race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment) and those who do not.

114. As part of the duty to have "due regard" where there is disproportionate impact on a group who share a protected characteristic, the City Corporation should consider what steps might be taken to mitigate the impact, on the basis that it is a proportionate means which has been adopted towards achieving a legitimate aim.

#### Risk implications

115. There are several key risks associated with this review including reputational risk and the potential for a legal challenge. £150,000 of costed risk has been allocated to cover potential costs associated with a legal challenge.

116. Should Members decide to progress a change to the traffic orders at Bank to amend the restrictions, there is a risk that TfL do not agree to the TMAN application when submitted. This would be mitigated by pursuing an experimental scheme and continuing to work closely with TfL.

117. Should a scheme be implemented, associated risks would be contained within the relevant project reports to Committee and actively managed and mitigated.

#### Equalities implications

118. Members must give due regard to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act

2010. The EqIA (Appendix 3) provides Members with the information they need to consider the equality duty at the time of taking a decision.

119. The four protected characteristics assessed - age, disability, pregnancy and maternity, and race - were identified in the Test of Relevance for the All Change at Bank scheme.

120. The EqIA uses a range of sources of information to provide meaningful consideration of how changes to the restriction may impact both positively and negatively on these protected characteristics and considers the likely impacts to changing the traffic restrictions at Bank on people using different modes of travel.

121. The EqIA considers the likely impacts of changing the restrictions to allow:

- Buses, cycles, and taxis (Scenario 1)
- Buses, cycles and P2Ws (Scenario 2)
- Buses, cycles, taxis and P2Ws (Scenario 3)

122. Of these, Scenario 1 is considered as likely to have the least negative impact on equalities. The EqIA found:

*“The biggest positive impact is due to the access provided to taxis to pass through the junction. This would benefit those who may rely on taxi access, such as older people, those with mobility impairments and pregnant women.*

*By only extending access to taxis, this would also limit the impact on public transport and cyclists. However, the inclusion of taxi access will still have direct impacts on public transport, active transport, and road safety, though to a lesser extent than some other scenarios with greater increases in vehicle access.”*

123. Noting concerns relating to personal safety and the lack of passive surveillance from passing motor vehicles, the EqIA analysis of crime trends indicates that “fluctuations in crime rates observed in and around Bank junction are proportional to trends across the CoL, suggesting that there has been no significant increase in crime compared to surrounding areas since the All Change at Bank scheme was implemented.”

124. Following consideration of the impacts and assessment of the analysis on taxi availability the EqIA concludes:

**“The additional research undertaken on taxi availability, journey times, and journey costs suggests that, as a whole, the restriction of taxi access through Bank junction between the hours of 7am to 7pm has not led to any extensive negative impacts on equality, and the impacts of the restrictions outside of these hours is deemed to be negligible. However, it is important to acknowledge that there have been some negative impacts for certain individuals, particularly those that are most reliant on taxis as an essential mobility aid, such as some disabled people, older people with age-related mobility impairments, and pregnant women.**

“The primary negative impact with the current traffic restrictions are the increases in journey time for some taxi users. Though taxis can serve every address at and around Bank junction at all hours of the day, for some taxi passengers, taxi journeys during restricted hours could now be longer and cost more, depending on trip origin, destination, and alternative route used. The severity of this negative

impact is nuanced and varies between relatively minor and relatively substantial. The additional study of taxi journeys showed that not all journeys via taxi or private hire vehicle are being negatively impacted, and some routes which avoid Bank junction are now quicker than if they passed directly through it.

“Ultimately, these negative impacts must be taken in context. Taxi journeys comprise approximately 1 per cent of all journeys to the CoL (for all purposes), and less than 1 per cent for people who travel to work in the CoL. Further consideration should also be given to the benefits that the current motor traffic restrictions deliver for all users, including disabled people, older people, and pregnant women. This includes the improvements to perceived and actual road safety, as well a less polluted space. Amending these restrictions to allow additional motor traffic through Bank junction would risk compromising these benefits to some extent, affecting everyone.

“Scenario modelling also demonstrates that permitting taxis through Bank junction would also have a negative impact on bus journey times. Bus mode share is five times higher for journeys travelling into the CoL than taxis, meaning that significantly more people use the bus to access Bank junction. Permitting taxis through Bank junction could risk negatively impacting journeys for a greater number of people, including public transport users who are disabled, older, or pregnant.”

125. The equality impacts identified in the EqIA, including the negative impacts of longer journey times for those that rely in taxis, are consistent with previous assessments of the All Change at Bank project. In previous decisions, these have been regarded as proportionate given the benefits of the traffic restriction and changes to the layout of Bank junction.

#### Climate implications

126. The All Change at Bank projects contributes to the delivery of the Climate Action Strategy by enabling and encouraging walking, wheeling and cycling; and supporting efforts to reduce motor traffic. The project will continue to contribute to the delivery of these outcomes if the restriction is altered, although the extent of the contribution will be reduced.

Security implications – None

#### **Conclusion**

127. This report concludes the review of the nature and timing of the restrictions at Bank Junction requested by the Court of Common Council in April 2022. It provides the Planning & Transportation Committee with the information it needs to make a recommendation to the Court of Common Council (in its capacity as the Highway Authority) on whether to pursue a change to the restrictions.
128. As with any traffic changes to the City’s streets, there will be benefits and disbenefits to different users of changing the restrictions or leaving them unchanged.



129. In terms of changing the restrictions at Bank to allow taxis, the benefits will primarily be some quicker and cheaper journeys for taxi passengers, and potentially an improved ease of hailing a taxi on-street and via ride hailing apps on the streets approaching the junction.
130. There are likely to be disbenefits for people travelling by bus, walking and wheeling, cycling and spending time at Bank. These include increased journey times, increased risk of collisions or reduced perceptions of safety and reduced ease of crossing.
131. The review has found no transport grounds or strong equality grounds for making a change to the restrictions to allow taxis during restricted hours. However, Members may still wish to pursue a change based on remaining equality concerns of those most reliant on taxis as an essential mobility aid and considering the anecdotal evidence of the economic impacts the Bank restrictions and their effect on the perception of the City as a business centre and visitor destination.
132. Any changes to the restrictions at Bank require an application to TfL under the TMAN process. A full traffic model audit from TfL will be required before a TMAN application can be made and considered. The next steps, should Members agree to pursue a change to the restrictions at Bank, are provided in Appendix 4.

## **Appendices**

Appendix 1 – All Change at Bank: Plan and description of changes

Appendix 2 – WSP Report: Bank Junction taxi availability analysis, March 2024

Appendix 3 – Steer report: All Change at Bank Equality Impact Assessment, April 2024

Appendix 4 – Next steps and indicative programme

Appendix 5 – Proportion of Londoners using modes of transport at least once a week (2016/17) (TfL)

Appendix 6 – Comparison of taxi volumes to other Local Access Streets

Appendix 7 - Casualty/Collision information

Appendix 8 – Bank junction Traffic modelling area

Appendix 9 – Correspondence received.

## **Background Papers**

The following papers were considered by the Streets & Walkway Sub Committee and/or the Planning & Transportation Committee.

[May/June 2022](#) – in principle methodology for undertaking the review.

[February/March 2023](#) – update report on the review.

[May/June 2023](#) – update on the review findings to date.

[November 2023](#) – progress report on the new data collection for the review.

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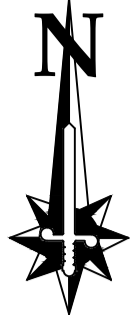
**Bruce McVean**



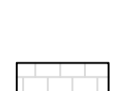
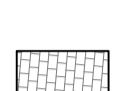






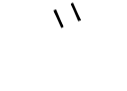



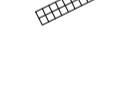
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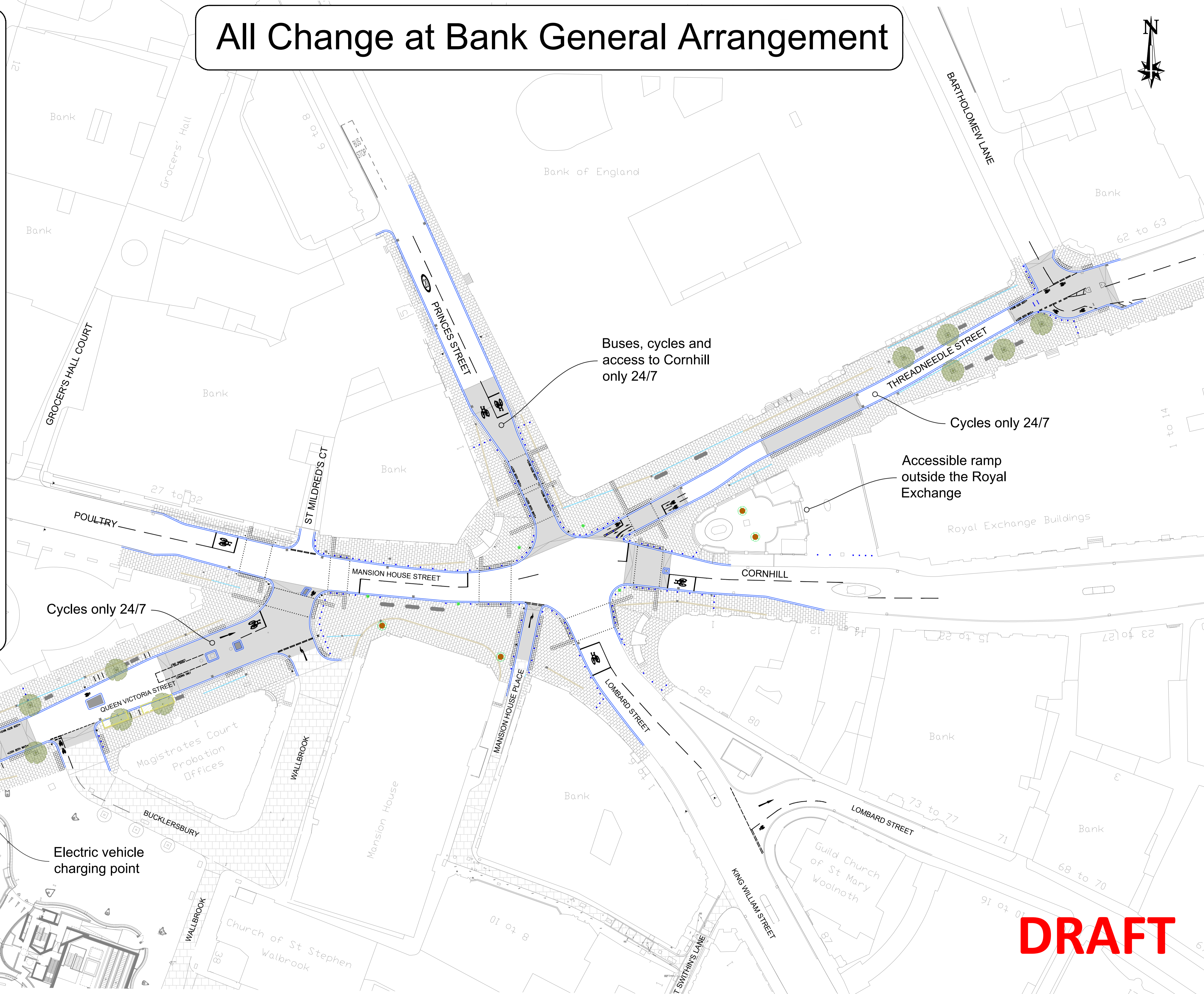
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# All Change at Bank General Arrangement








- Key**
-  New kerb line forming new footway buildouts
  -  Raised section of carriageway
  -  Existing raised section of carriageway
  -  New Yorkstone paving
  -  Tree
  -  Planter (in ground with 150mm high raised kerb edge). Possible SUDs
  -  Planter (surface sitting pot ~2m high with planting)
  -  Heritage Lamp column
  -  Stone seating
  -  Benches
  -  Cycle stands
  -  Yorkstone channel
  -  Hauraton channel
  -  Bollard (locations/number subject to change)
  -  Blister tactile paving

Page 27



**DRAFT**

# All Change at Bank Access to approach arms at Bank

-  Buses and cycles only (Mon-Fri 7am-7pm)
-  Cycles only 24/7
-  Bus and cycle traffic only 24/7 and access to Cornhill
-  Permitted movements
-  One way



## Aerial view looking west at Bank Junction

September 2014,  
Photo by MattFromLondon



February 2024



## Bank Junction looking east towards Royal Exchange

- Top photo taken January 2020
- Bottom photo taken March 2024





City of London

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# BANK JUNCTION TAXI AVAILABILITY ANALYSIS

Final Report





City of London

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# **BANK JUNCTION TAXI AVAILABILITY ANALYSIS**

Final Report

**TYPE OF DOCUMENT (VERSION) PUBLIC**

**PROJECT NO. 70116126**

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JOURNEY TIME COLLECTION DATA

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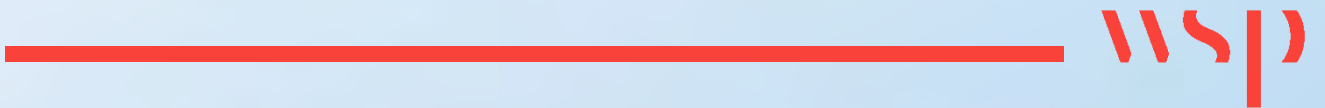
CONGESTION CHARGE AND LOW EMISSIONS ZONE

APPENDIX G

TAXI AND PRIVATE HIRE LICENSING FIGURES BY YEAR

# 1

## INTRODUCTION



# 1 INTRODUCTION

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## 1.1 OVERVIEW

Since 2017, a bus and cycle only restriction has been in effect at Bank junction from 7 am to 7 pm, Monday to Friday. This was implemented as an experimental traffic order to predominately address the poor safety record at the junction. This was made permanent in 2018 and complementary interim footway widening was implemented shortly after. The City of London is now midway through completion on the All Change at Bank scheme. This will restrict traffic on three of the six arms of the junction and create a larger area of public realm space at the centre of the junction. The works are due for completion in Spring 2024. The current proposals retain the ‘bus and cycle restriction’ as it is on the remaining three arms, but there has been an ongoing commitment to review the traffic mix and timings.

A review is now being undertaken and the primary consideration for change is whether altering the traffic mix would address concerns about equality and accessibility for people who rely on taxis over those disbenefits for those that use public transport or who walk and cycle.

WSP have been commissioned by the City to undertake a comprehensive analysis around the availability of taxis, and to ascertain if Bank and the wider TfL Bishopsgate restrictions are negatively impacting the level of taxi provision in the City. Part of this work includes a comparison with taxi availability in the West End.

This final report includes analysis of the availability of taxis in terms of:

- Taxi rank usage – surveys at nearly 30 sites in the City to assess how frequently these are used by taxis, and frequency of rides being hailed from a rank;
- Ride hailing apps – determining wait time for private hire and black cab services over a 14 hrs period at a number of locations in the City;
- A comparison with traffic classification count survey from Westminster – assessing trends in taxi volumes over the past five years and proportions of taxis in the traffic mix;
- Taxi availability surveys – number of taxis passing at a number of locations in the City and if they had their lights on or off; and
- Journey times comparison – assessing variation in driving times using different routes via Bank Junction; Bishopsgate, and the fastest route on a travel planning app.

Human behaviour and decision-making play a significant role in taxi operations. Data alone cannot fully account for the unpredictability of passenger demand on a particular day, breaks had by taxi drivers, the impact of special events, weather, and changes to junction signal timings may have on taxi usage. These human-driven factors introduce a level of complexity and uncertainty that may not be fully represented in our dataset.

Analysis has been undertaken through a mix of site-specific analysis and breaking the City of London into ‘areas’. These consist of Bank sites grouped together to inform detailed

analysis, with other sites grouped into North, East, and West to make comparisons across different parts of the City. Data collection locations are shown in Figure 1-1 and Figure 1-2 below.

Since data collection occurred in the City for this report, changes have occurred to the bus gate restrictions at Cheapside. In early November the restrictions were amended to allow taxis to travel through it and along Cheapside. This was not the case on the dates we have analysed whereby taxis needed to turn off Cheapside in advance of the restrictions. Therefore data from Cheapside in this report is likely to not reflect the current on-street situation.

Throughout this report, a multi-chart format has been utilised to effectively show Bank Junction restriction time frames and additional data points within a singular chart.

The background of the chart features a blue bar graph, to highlight the time frame spanning from 7 am to 7 pm that traffic restrictions in Bank Junction are in place. Simultaneously, overlaid on this backdrop is a line graph, plotted to showcase a separate dataset, representing the observed patterns or trends in the data.

However, a visual discrepancy occurs whereby the blue bars extend beyond the intended restriction hours, intruding into non-restricted time intervals. This anomaly arises due to the positioning of each data point represented by the line graph, which aligns centrally within the corresponding hour segments of the bar graph. Consequently, this may inaccurately suggest that the imposed restrictions extend beyond the specified timeframe.



Figure 1-1 - Data collection locations in City of London for data within the Report

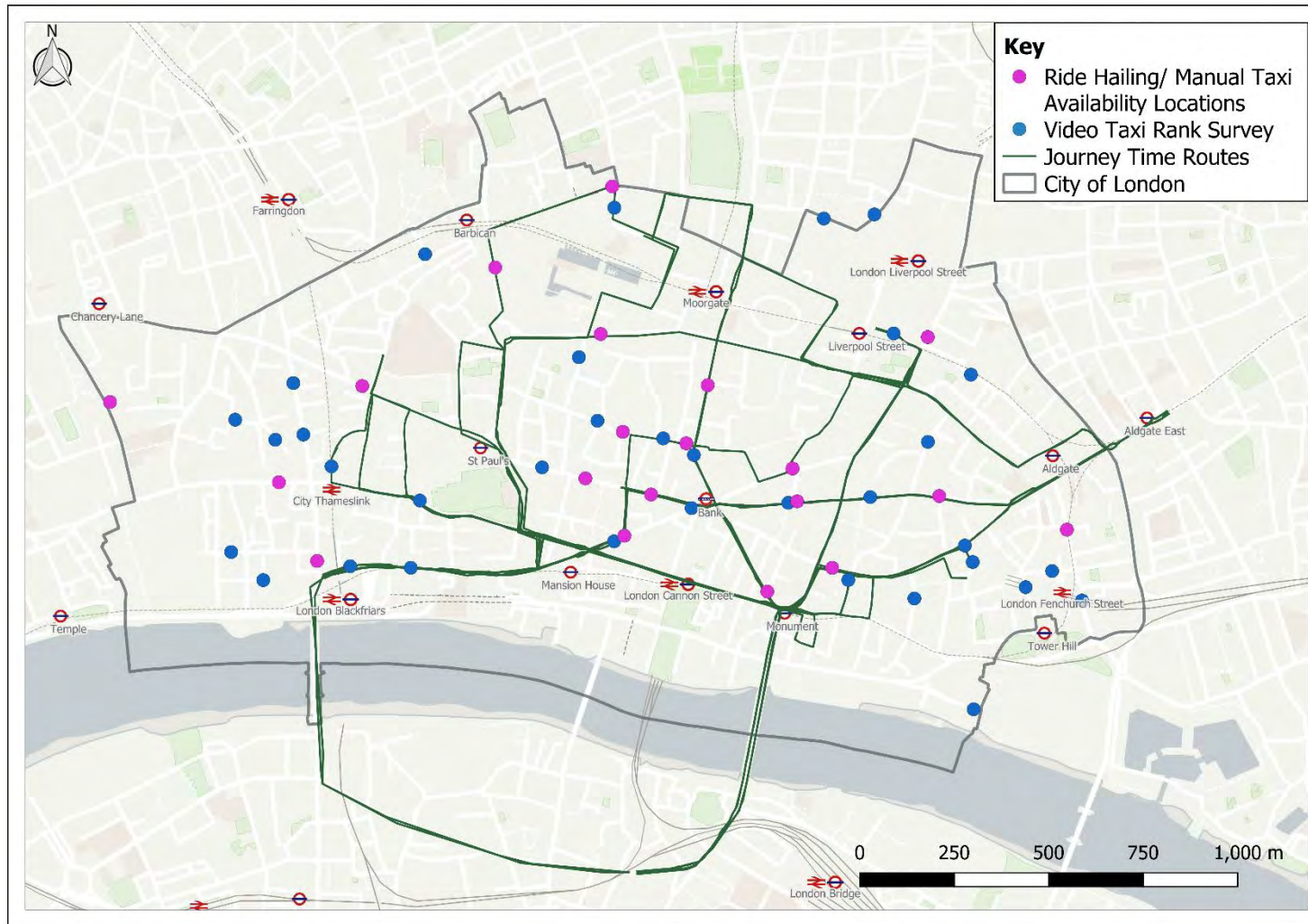


Figure 1-2 - Data collection locations in Westminster for data within the Report



# 2

## METHODOLOGY



## 2 METHODOLOGY

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### 2.1 TAXI RANK SURVEY

34 taxi ranks in the City were identified to be surveyed to see how well they are used (Figure 2-1).

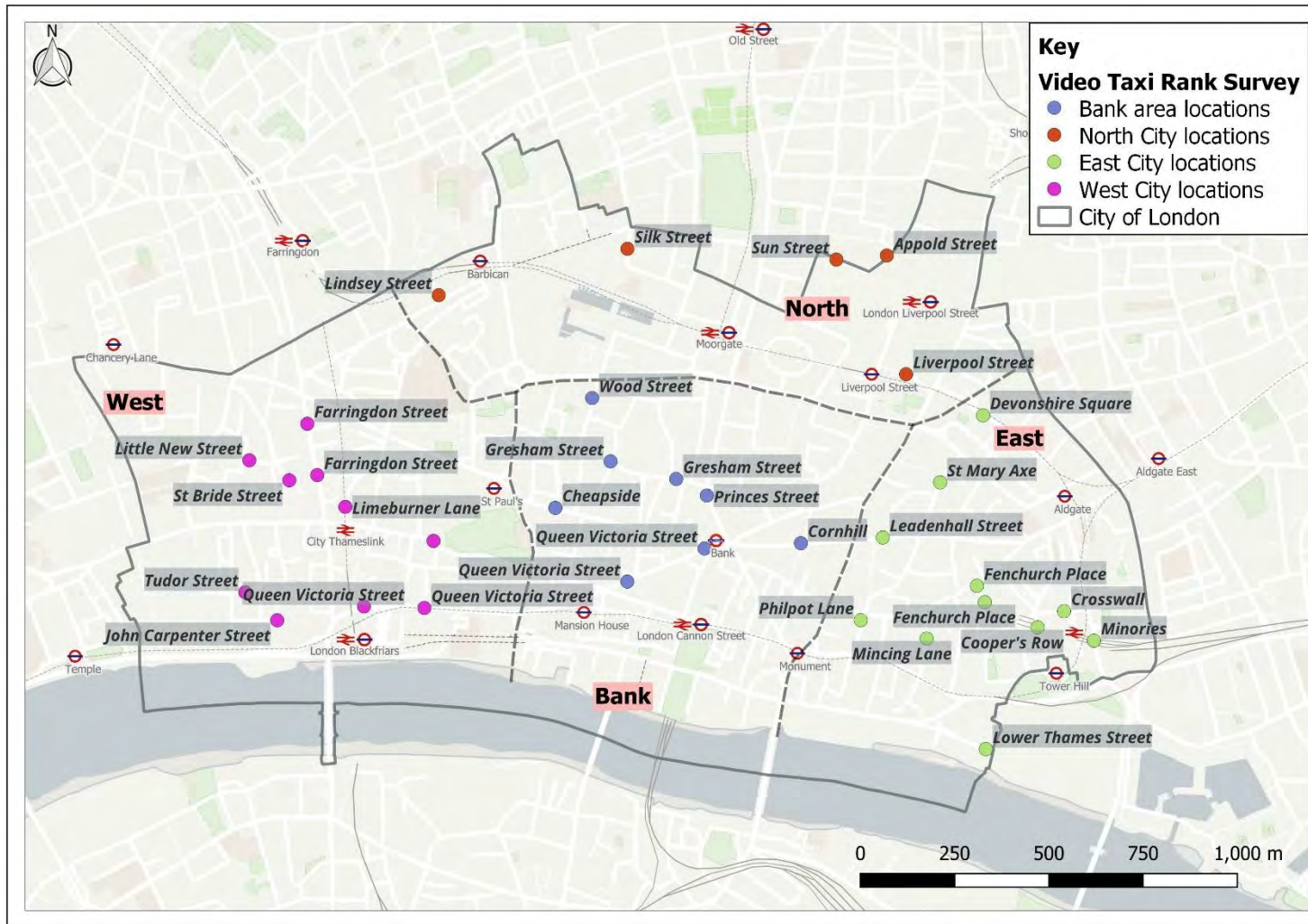
Of the 34 locations, 28 had complete successful surveys, three had no data and three had incomplete data. A 'site by site' summary is available in Appendix A.

The survey recorded:

- The time when each taxi entered the rank;
- Recorded when each taxi left the rank;
- The length of time each taxi spent at the rank; and
- Whether each taxi picked up a passenger before leaving the rank.

Ranks were surveyed Wednesday 11 October 2023. As operating hours were not available for all sites, sites were surveyed for 24hrs regardless. All available operational hours data is summarised in Table 3-1 (page 18), and full details included in Appendix B.

Figure 2-1 - Taxi rank survey locations



## 2.2 RIDE HAILING APPS

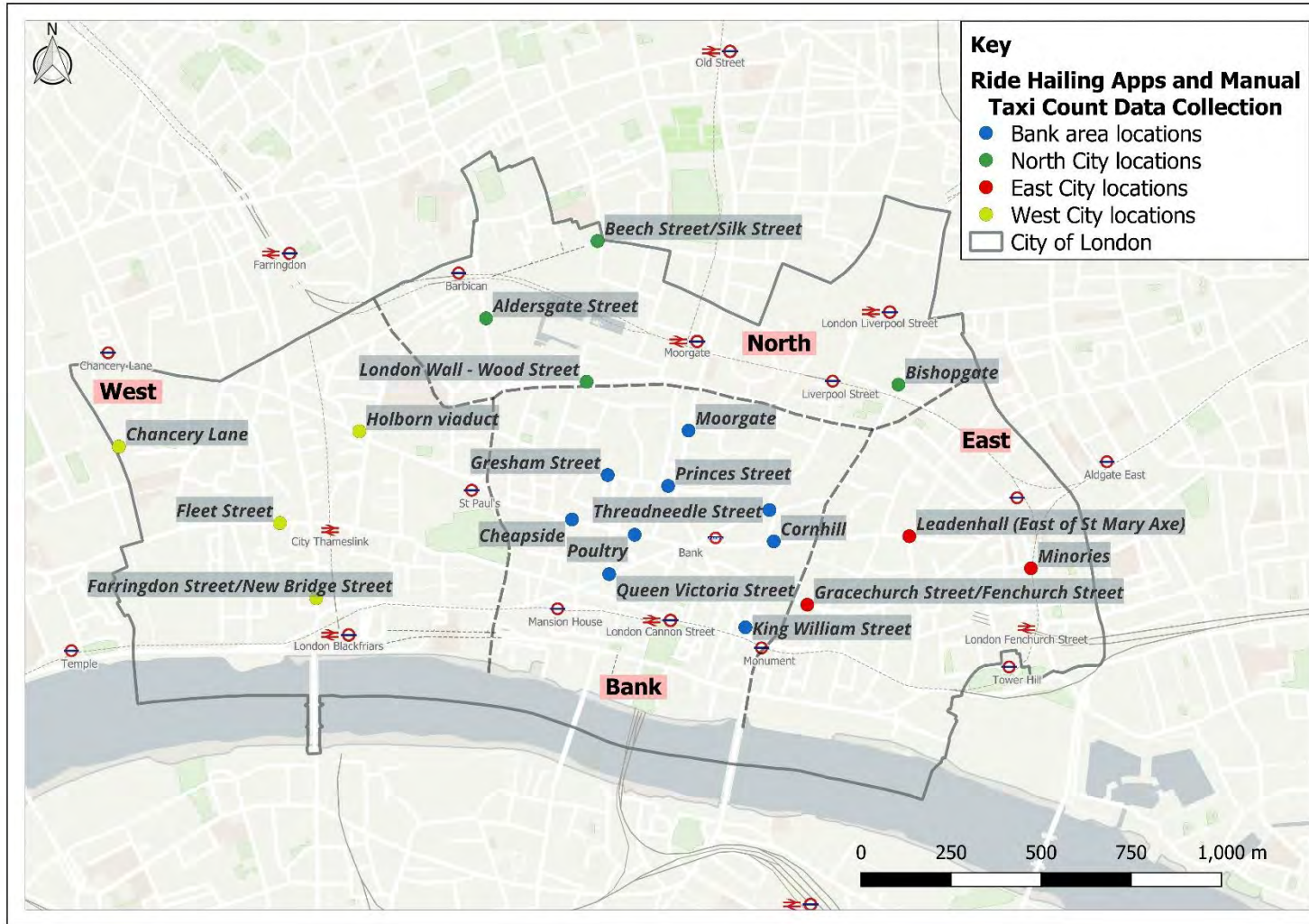
Waiting times for a taxi and private hire vehicles (PHVs) via ride hailing apps were captured for each survey site in Figure 2-2. This was captured once every 15 minutes between 7am and 1am for one full day per site occurring on either Tuesday 17<sup>th</sup>, Wednesday 18<sup>th</sup> and Thursday 19<sup>th</sup> of October 2023 using the following apps and services:

**Table 2-1 - Ride hailing apps used for each data set, taxis, and private hire vehicles**

Taxi	Private Hire Vehicles (PHVs)
Free Now	Free Now
Addison Lee	Uber
Bolt	Bolt

The dates analysis took place at each site are included in Appendix C. These locations correspond to the sites for the manual taxi availability surveys.

Figure 2-2 - Ride hailing data collection locations divided into 'areas'



## 2.3 WESTMINSTER DATA

The evolution of taxi volumes in Westminster before and after the onset of the COVID-19 pandemic was investigated by considering several metrics including the proportion of taxis within the overall traffic, the absolute number of taxis by day, and data segmented by hourly intervals. This data was collected by a third party (Westminster City Council) and analysed by WSP.

The classified traffic count data from Westminster covered Oxford Street pre-COVID-19 on 04/05/2017, Oxford Street post- COVID-19 on 21/09/2022, Regent Street pre- COVID-19 on 26/05/2017 and Regent Street post- COVID-19 on 20/05/2022.

These locations were selected from numerous available location counts plotted on a map, and those with nearby pre and post COVID-19 data selected as pairs.

Oxford Street counts (Figure 2-3):

- 1- A40 Oxford Street / Portman Street / Park Street;
- 2- A40 Oxford Street / Orchard Street;
- 3- Oxford Street / Duke Street; and
- 4- Oxford Street / Holles Street.

Regent Street counts (Figure 2-4):

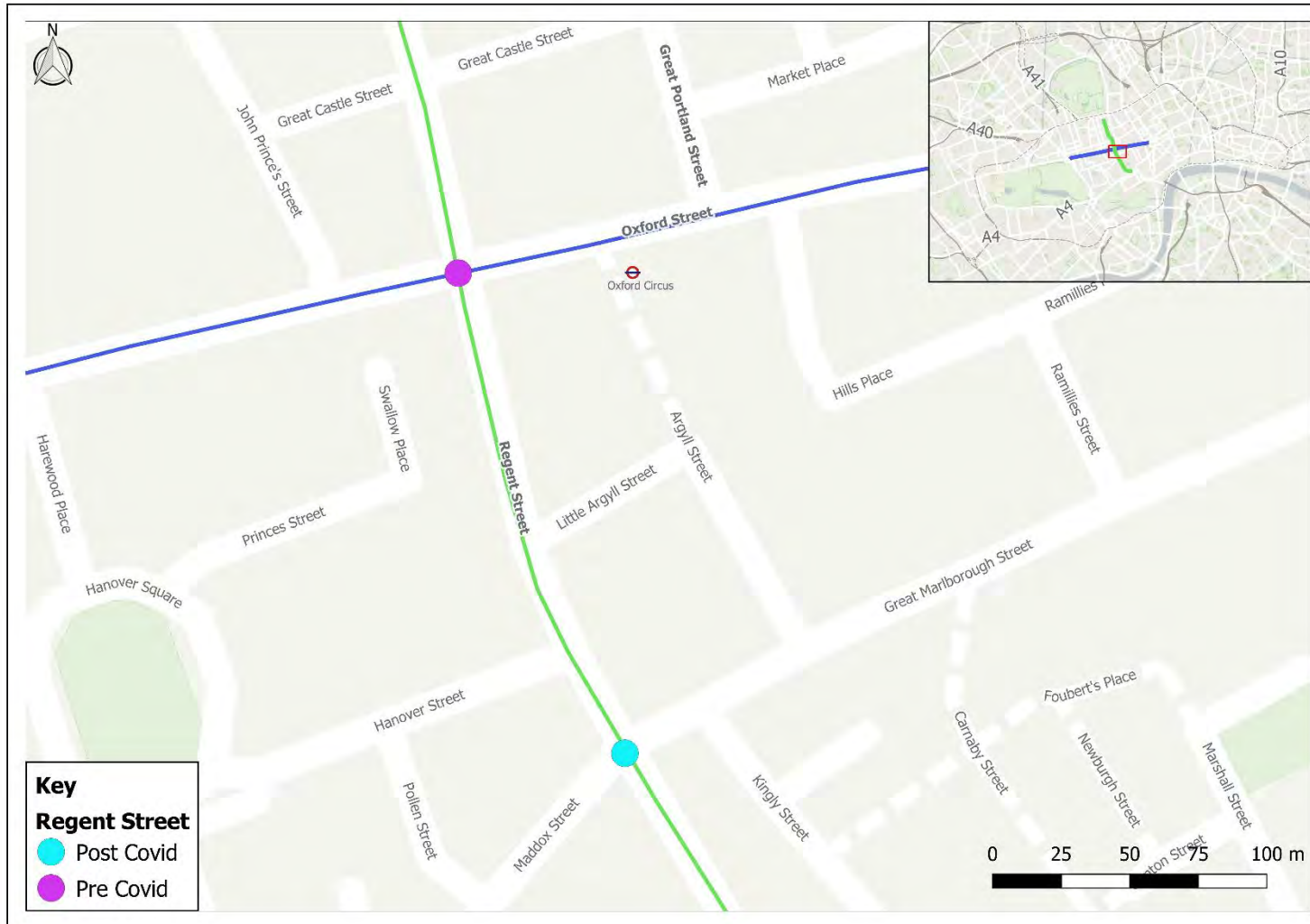
- 1- Oxford Street/ Regent Street junction (2017, pre- COVID-19) and Regent Street/ Great Marlborough junction (2022, post- COVID-19).



**Figure 2-3 - Oxford Street classified count locations**



**Figure 2-4 - Regent Street classified count locations**



## 2.4 MANUAL TAXI AVAILABILITY SURVEYS

Manual taxi count surveys were undertaken to record the number of taxis passing the survey location in both directions, whether they had their lights on or off, and how many passengers they were carrying.

Data was collected between 7am and 1am in 15-minute periods on Tuesday 17th, Wednesday 18<sup>th</sup>, Thursday 19th of October, and 2<sup>nd</sup> November 2023.

On the 18<sup>th</sup> October a high security event took place at Mansion House. High security events can sometimes result in temporary road closures for important arrivals, or the increased use of taxis arriving and departing for use of officials. In this instance the site operatives did not notice any prolonged impacts on the movement or availability of taxis.

The dates analysis took place at each site are included in Appendix C. These locations correspond to the sites for the ride hailing app surveys.

## 2.5 JOURNEY TIME DATA

A series of journey time surveys between the four 'origin-destination' pairs listed below were undertaken on Thursday 9th November. Journeys were made between two and six times per pair and via route option in each direction between 4pm and 7pm.

The 'origin-destination' pairs are as follows:

- 1- Southwark Street to Silk Street (via London Bridge);
- 2- Whitechapel High Street to Blackfriars Station;
- 3- Fenchurch Street Station to Giltspur Street; and
- 4- Liverpool Street to Queen Street.

All 'origin-destination' pairs were allocated at least two routes for journey time surveying, with two pairs given a third route via Bishopsgate for additional data collection. These can be seen below:

**Figure 2-5 - Routes driven for each ‘origin-destination’ pairing**

	Take the vehicle through Bank junction	To be taken along Bishopsgate	Take the vehicle along the fastest route that observes all relevant traffic restrictions in place between 7am and 7pm*
1. Southwark Street to Silk Street (via London Bridge)	X	X	X
2. Whitechapel High Street to Blackfriars Station	X		X
3. Fenchurch Street Station to Giltspur Street	X		X
4. Liverpool Street to Queen Street	X	X	X

*\*As well as the pre decided driving routes, the surveyor used the GPS-enabled routing application called Waze. Waze is an app which uses data from other users to understand real life traffic situations and analyses the quickest route. The drivers undertaking the journey time surveys used Waze immediately before the journey started to determine the quickest route to be taken.*

The surveyor also used the TfL Go app immediately before the journey was started and recorded the fastest time and route by public transport that was ‘step-free’ as listed by the app.

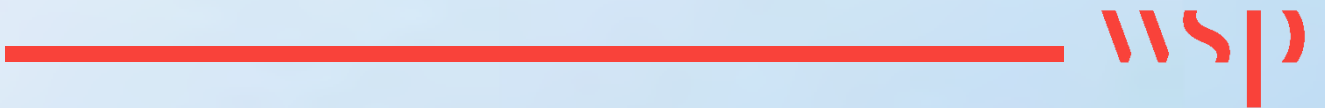
At the time of the survey being completed Bank junction had temporary traffic lights operating. These had the potential to add up to 2 minutes onto a journey time run. A breakdown of each run time can be found in Appendix D. Bishopsgate restrictions were also in place and the vehicles were exempted from the penalty charges for the purposes of the trial.

Analysis was undertaken to determine the estimated cost of each journey were the journey to be taken by a black cab, based on Tariff 1 of Transport for London’s (TfL) taxi fares for 2023: <https://tfl.gov.uk/modes/taxis-and-minicabs/taxi-fares/tariffs>

*Tariff 1 is for any hiring during Monday to Friday between 05:00 and 20:00, other than on a public holiday. For the first 190.8 metres or 41.0 seconds (whichever is reached first) there is a minimum charge of £3.80; for each additional 95.4 metres or 20.5 seconds (whichever is reached first), or part thereof, if the distance travelled is less than 9,635.4 metres there is a charge of 20p; once the distance has reached 9,635.4 metres then there is a charge of 20p for each additional 86.9 metres or 18.7 seconds (whichever is reached first), or part thereof.*

# 3

## ANALYSIS



### 3 ANALYSIS

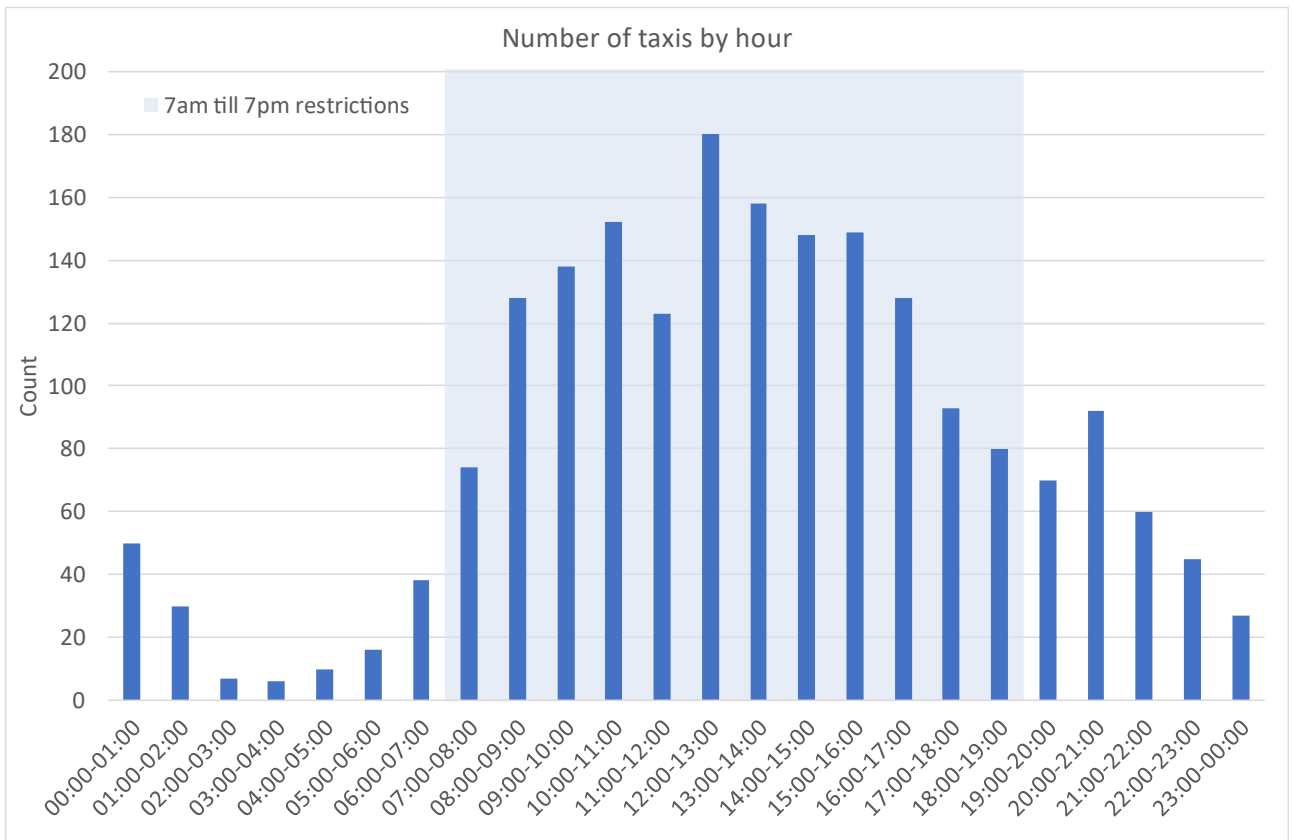
#### 3.1 TAXI RANK SURVEY (CAMERAS)

Data was able to be collected for the majority of the taxi ranks in the City, over a 24-hour period. While we have collected extensive data from numerous taxi ranks, including information about the number of taxis that visit, dwell times, and whether passengers are picked up, it's essential to recognise that there are limitations to being able to draw clear conclusions from the dataset.

Throughout this analysis, data has been compared by site and by 'area' as split out in Figure 2-1 (page 7). There is an even geographical provision of taxi ranks within the City. Liverpool Street has been extracted as a separate site and not included in the North area average due to its high numbers not being comparable to other locations. In total, over at 24-hour period, ranks in the Bank area (seven ranks) had 135 recorded visits by taxis, East (11 ranks) had 664, Liverpool Street (one rank) 879, North (three ranks) 74, and West (eight ranks) 250.

Over the survey period 2002 taxis were recorded across 30 ranks. The number of taxis arriving at any rank peaked at 12:00 to 13:00 and was lowest between 02:00 and 04:00.

**Figure 3-1 - Number of taxis arriving at all locations by hour**



Not all taxi ranks reviewed in the city are operation 24 hours a day. The table below shows the hours for which the taxi ranks are non-operational coloured in 'grey'. Taxi ranks are normally appointed by the City of London Police and operational times are correct as of October 2022\*<sup>1</sup>. It also shows the number of taxis which visited each rank, per hour of operation.

Full taxi rank locations can be found in Appendix A and details on the hours of operation in Appendix B. Figure 3-2 (page 20) shows that taxi ranks in all areas of the City differ in their usage. It does not appear that one geographical area is more popular than others when comparing the number of taxis visiting the ranks. What appears more important in terms of usage by taxis is the proximity of the rank to key attractors such as transport stations, tourist destinations and hotels.

As can be seen in the table, despite the operational time, it appears some ranks are being used outside of reported hours such as Mincing Lane, Princes Street and Limeburner Lane.

Despite some taxi ranks having very low counts such as both locations on Farringdon Street, this does not reflect the number of taxis in the surrounding area. As shown in Table 3-3 (page 50), Fleet Street and Holborn Viaduct, locations nearby, had some of the highest counts of available taxis across the city. This shows that although some ranks are not highly used, taxis are still available to hail on the road or via apps.

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<sup>1</sup> <https://content.tfl.gov.uk/tfl-taxi-ranks-booklet.pdf>, Appendix B.



**Table 3-1 - Heat map showing number of taxis visiting each rank by location for 24 hours**

	Site No.	0-1am	1-2am	2-3am	3-4am	4-5am	5-6am	6-7am	7-8am	8-9am	9-10am	10-11am	11-12am	12-1pm	1-2pm	2-3pm	3-4pm	4-5pm	5-6pm	6-7pm	7-8pm	8-9pm	9-10pm	10-11pm	11-12am	Total
Lindsey Street	1	2	0	0	0	0	0	0	2	0	0	3	1	2	2	2	1	2	4	1	0	1	2	0	0	<b>25</b>
Silk Street	2	1	0	0	0	0	0	0	2	2	4	1	2	1	1	2	0	1	3	7	1	1	2	1	0	<b>32</b>
Appold S	4	0	0	0	0	0	0	0	0	3	0	0	1	4	0	0	2	2	2	0	2	1	0	0	0	<b>17</b>
Liverpool St	5	33	22	3	2	4	2	11	29	57	55	66	54	70	65	55	59	48	34	31	45	54	34	29	17	<b>879</b>
Devonshire Sq	6	0	0	0	0	0	0	0	0	0	0	0	0	2	1	1	0	0	0	0	0	0	0	0	0	<b>4</b>
St Mary Axe	7	4	1	2	1	1	1	3	1	0	0	4	4	4	2	1	4	1	0	2	0	2	1	1	1	<b>41</b>
Leadenhall St	8	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>1</b>
Philpot Lane	9	1	1	0	0	0	0	0	4	7	8	4	5	4	4	1	0	3	3	2	1	2	1	0	0	<b>51</b>
Mincing Lane	10	0	1	0	0	0	0	0	0	2	3	0	0	1	0	1	0	1	0	2	0	0	0	0	0	<b>11</b>
Worth Fenchurch PI	11	0	0	0	0	0	1	1	0	3	6	2	5	4	2	2	3	3	3	2	0	1	1	0	0	<b>39</b>
Fenchurch PI	12	2	0	0	0	0	6	9	14	31	15	12	14	15	15	9	9	13	7	8	0	7	4	4	1	<b>195</b>
Coopers Row	13	0	1	0	2	3	3	6	9	7	14	5	3	6	6	11	7	5	1	4	6	4	5	3	1	<b>112</b>
Minories	14	0	0	0	0	0	0	0	0	0	2	0	1	0	2	0	0	0	3	0	0	0	0	0	0	<b>8</b>
Lower Thames St	15	0	0	0	0	0	0	0	1	4	7	19	9	17	21	24	28	20	17	6	1	0	0	0	1	<b>175</b>
Cornhill	16	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>1</b>
Queen Victoria St	18	0	0	0	0	0	0	2	0	1	0	0	2	1	2	1	1	0	0	0	2	0	1	0	1	<b>14</b>
Princes St	19	0	0	0	0	0	0	0	0	0	1	0	0	1	0	0	0	1	0	2	0	1	0	0	1	<b>7</b>
Gresham St	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	2	1	0	0	0	<b>5</b>
Gresham St	21	1	1	0	0	0	0	0	3	1	3	4	2	4	1	2	1	0	1	0	1	3	2	4	2	<b>36</b>
Cheapside	22	0	0	0	0	0	2	1	1	2	0	2	6	10	9	7	8	9	4	2	1	1	0	0	0	<b>65</b>
St.Paul's C Y	23	6	0	1	1	0	0	1	2	2	8	10	6	15	10	13	18	14	3	3	1	6	4	2	1	<b>127</b>
Queen Victoria St	24	0	0	0	0	0	1	2	2	0	1	4	1	4	4	1	2	0	2	0	4	2	2	0	1	<b>33</b>



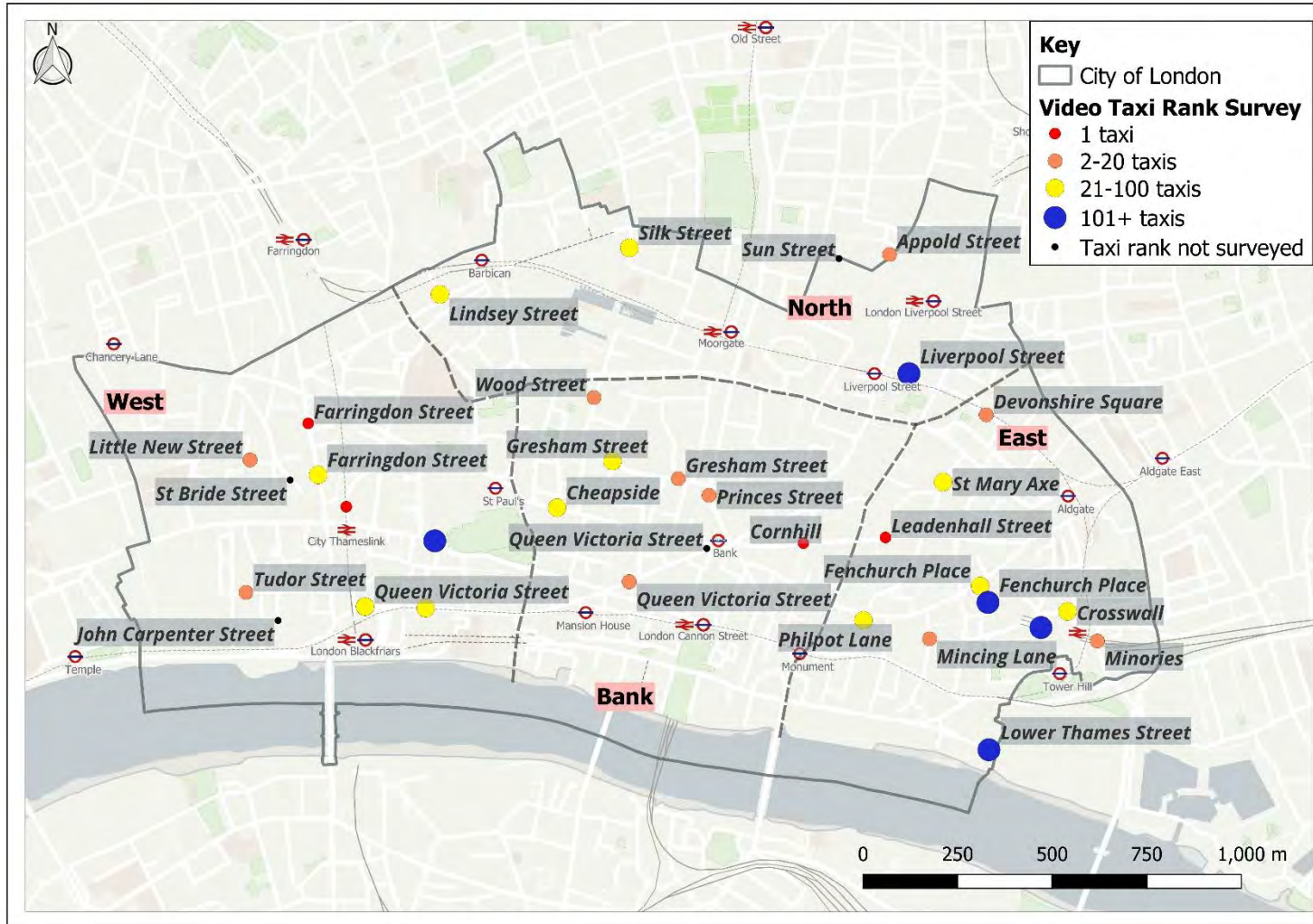


	Site No.	0-1am	1-2am	2-3am	3-4am	4-5am	5-6am	6-7am	7-8am	8-9am	9-10am	10-11am	11-12am	12-1pm	1-2pm	2-3pm	3-4pm	4-5pm	5-6pm	6-7pm	7-8pm	8-9pm	9-10pm	10-11pm	11-12am	Total
Queen Victoria St	25	0	1	1	0	2	0	1	1	3	0	3	1	1	3	6	2	2	2	3	0	3	1	1	0	37
Tudor St	27	0	0	0	0	0	0	0	0	0	2	1	0	3	1	2	0	1	0	1	0	0	0	0	0	11
Limeburner Ln	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1
Farringdon St	29	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1
Little New St	31	0	0	0	0	0	0	0	0	0	0	1	0	2	0	0	2	0	1	3	2	0	0	0	0	11
Farringdon St	32	0	0	0	0	0	0	1	2	2	4	5	1	4	3	3	2	1	0	0	0	1	0	0	0	29
Wood St	33	0	0	0	0	0	0	0	1	0	0	3	0	0	1	1	0	0	1	0	0	0	0	0	0	7
Crosswall	34	0	0	0	0	0	0	0	0	1	5	3	5	5	2	3	0	0	1	0	1	1	0	0	0	27

Key

Colour	Count of taxis
Grey	Non-operational hours
White	0
Light blue	1-5
Medium blue	6-11
Dark blue	12+

Figure 3-2 - Map showing number of taxi recordings by site

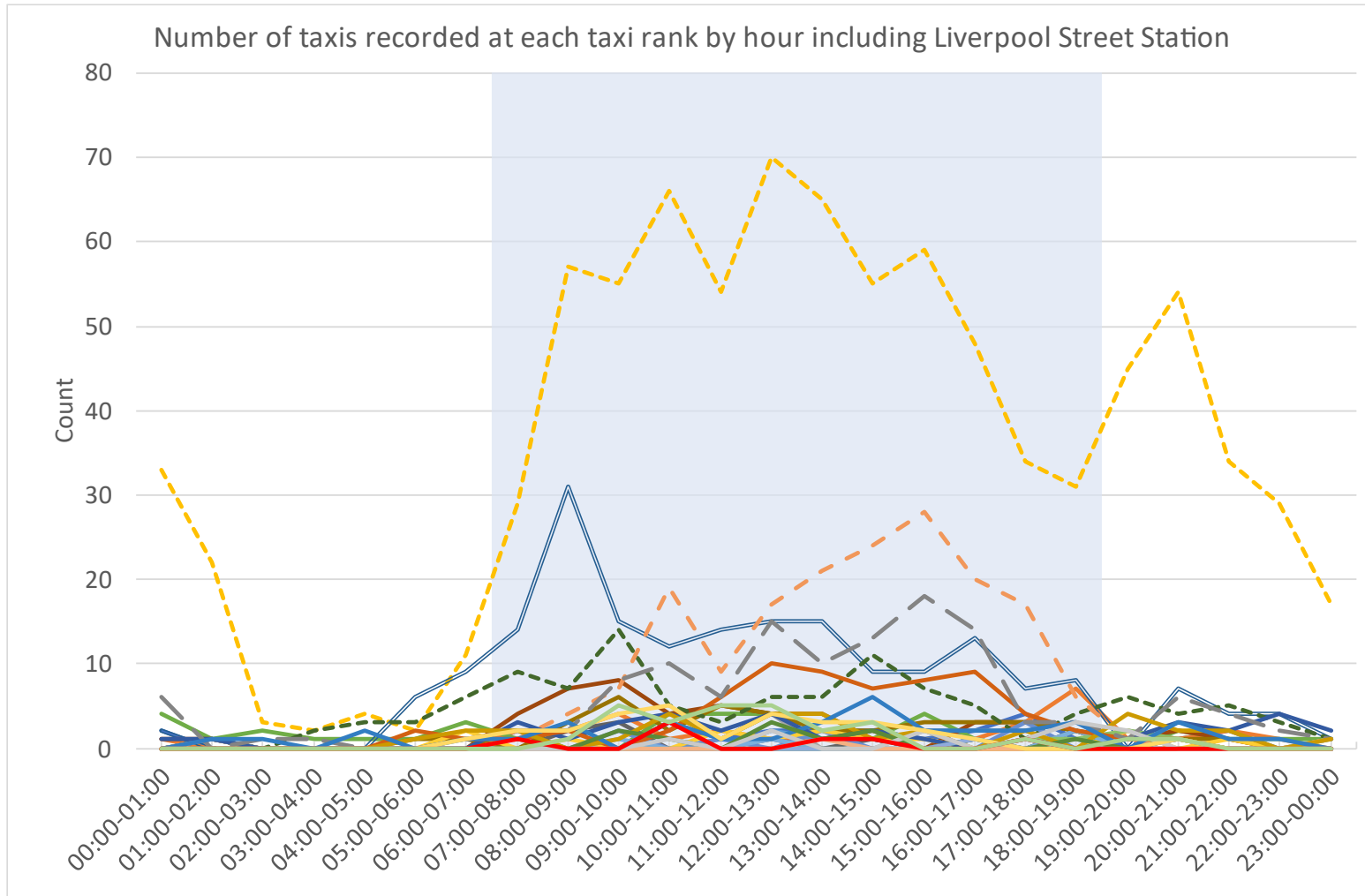


Liverpool Street station has the highest recorded number of taxis across the day (Figure 3-3). Taxis exceeded 30 an hour between 8am and 10pm, only falling below 20 taxis an hour between 2am and 7am, and 11pm and midnight. This rank operates differently to the other ranks in the City as it operates near the station exit as a continuous feeder rank.

The taxi ranks with the next highest level of visitation/ utilisation includes Fenchurch Place/St Katherines Row which is adjacent to Fenchurch Street station. Fenchurch Place shows a significantly higher turnover of taxis in the morning peak which is expected at a major train station The rank on Lower Thames St is adjacent to the Tower of London. It is expected that these three ranks would have a high level of taxi usage.

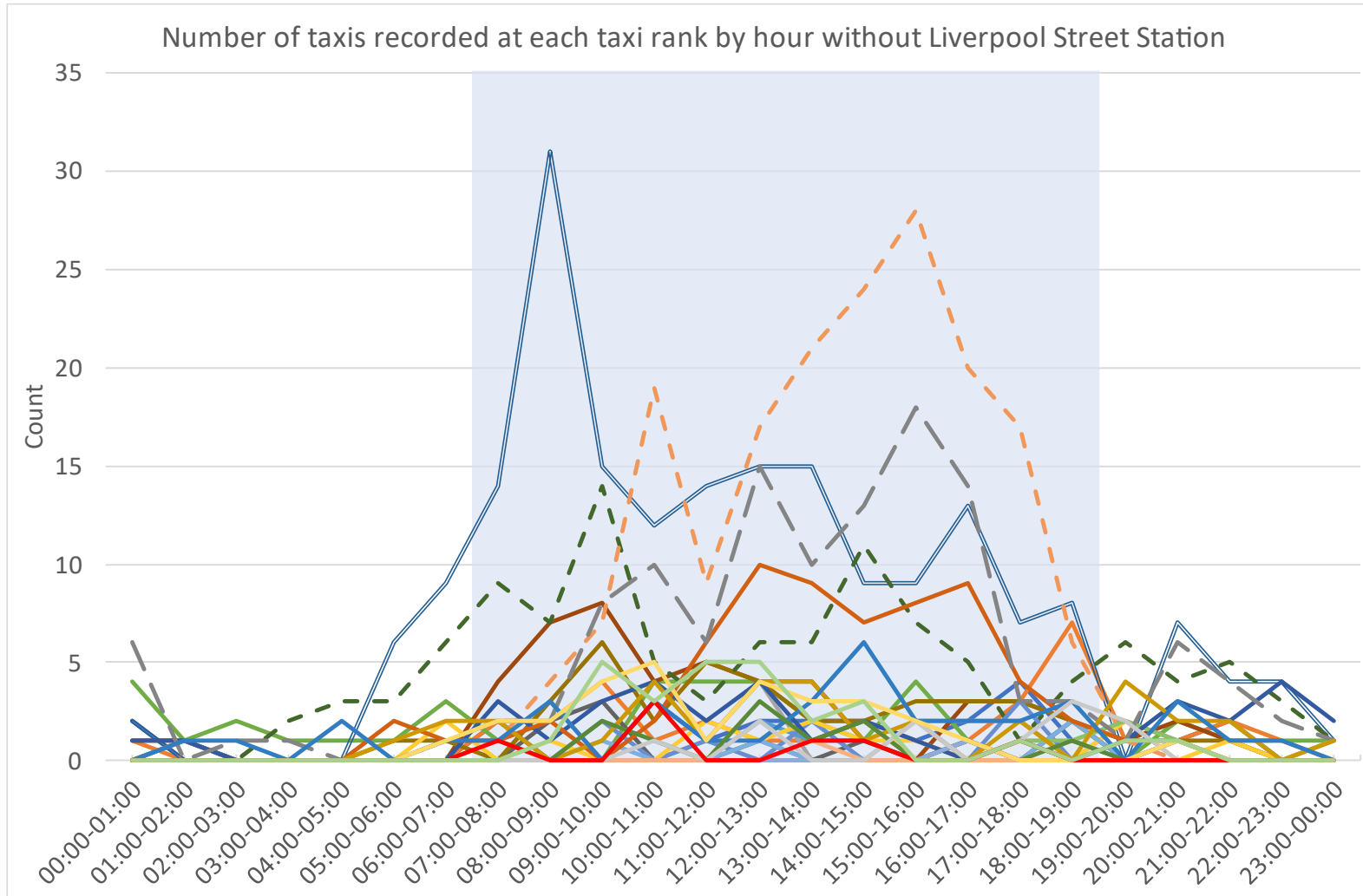
Figure 3-4 (page 24) shows the Fenchurch Place/ St Katherines Row, Lower Thames Street and Coopers Row also had some of the most visited taxi ranks between 7am and 7pm.

**Figure 3-3 - Number of taxis recorded at each taxi rank by hour including Liverpool Street Station**



7am till 7pm restrictions	Lindsey Street (east of Smithfield Market)
Silk Street (adj Linklaters)	Appold Street
Liverpool Street (East)	Devonshire Square
St Mary Axe	Leadenhall Street
Philpot Lane	Mincing Lane
Fenchurch Place /Fenchurch St	Fenchurch Place /St Katherines Row
Coopers Row	Minories
Lower Thames Street	Cornhill
Queen Victoria Street (Bloomberg)	Princes Street
Gresham Street (west junc with Old Jewry)	Gresham Street (west Milk Street)
Cheapside ( One New Change)	St. Paul's Churchyard
Queen Victoria Street (Church of Scientology)	Queen Victoria Street (Blackfriars Station)
Tudor Street	Limeburner Lane
Farringdon Street (opp Goldman Sachs)	Little New Street
Farringdon Street (Old Fleet Lane)	Wood Street
Crosswall	

**Figure 3-4 - Number of taxis recorded at each taxi rank by hour without Liverpool Street Station**

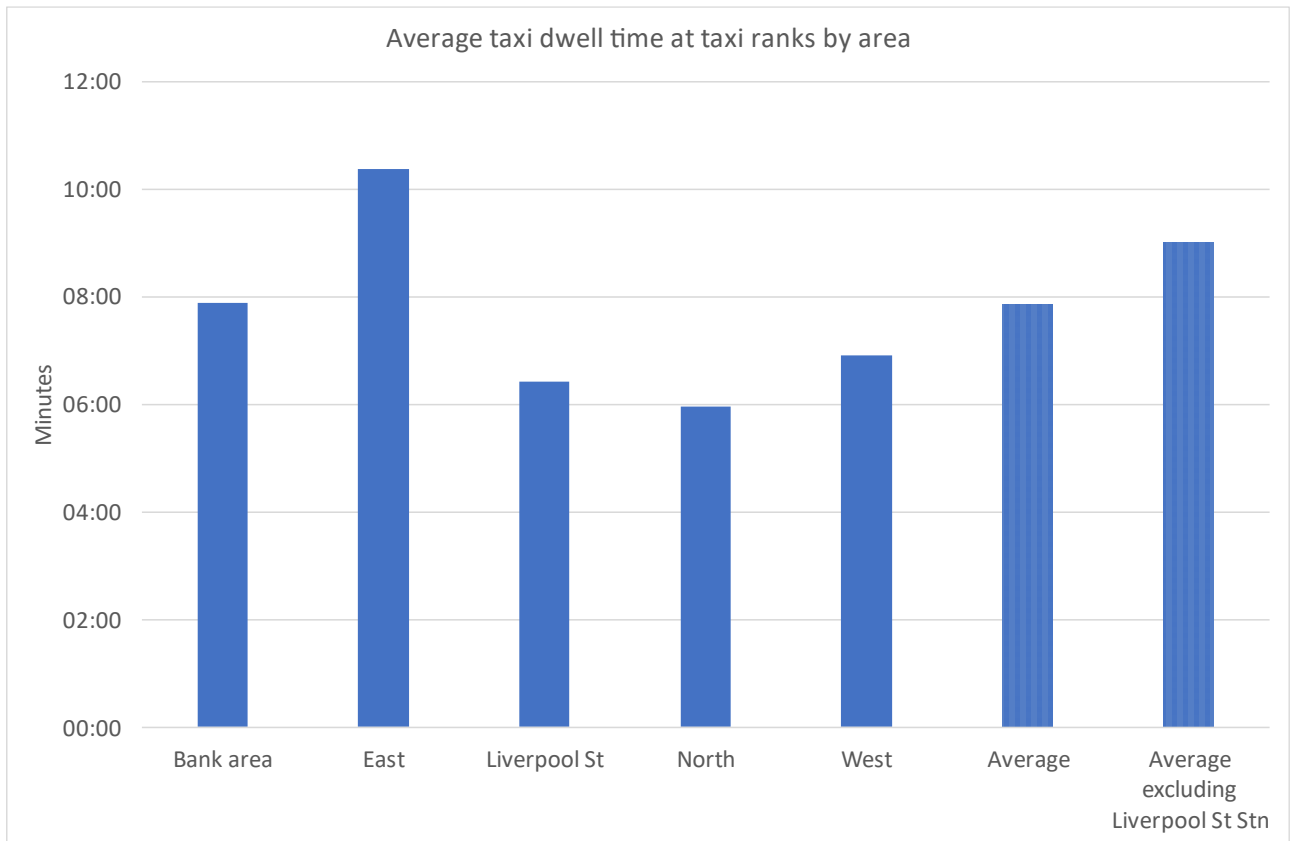


7am till 7pm restrictions	Lindsey Street (east of Smithfield Market)
Silk Street (adj Linklaters)	Appold Street
Devonshire Square	St Mary Axe
Leadenhall Street	Philpot Lane
Mincing Lane	Fenchurch Place /Fenchurch St
Fenchurch Place /St Katherines Row	Coopers Row
Minorities	Lower Thames Street
Cornhill	Queen Victoria Street (Bloomberg)
Princes Street	Gresham Street (west junc with Old Jewry)
Gresham Street (west Milk Street)	Cheapside ( One New Change)
St. Paul's Churchyard	Queen Victoria Street (Church of Scientology)
Queen Victoria Street (Blackfriars Station)	Tudor Street
Limeburner Lane	Farringdon Street (opp Goldman Sachs)
Little New Street	Farringdon Street (Old Fleet Lane)
Wood Street	Crosswall

Average dwell time across the sites ranges from under one minute at Princes Street and Gresham Street (west of junction with Old Jewry) to over 20 minutes at Little New Street (Figure 3-6).

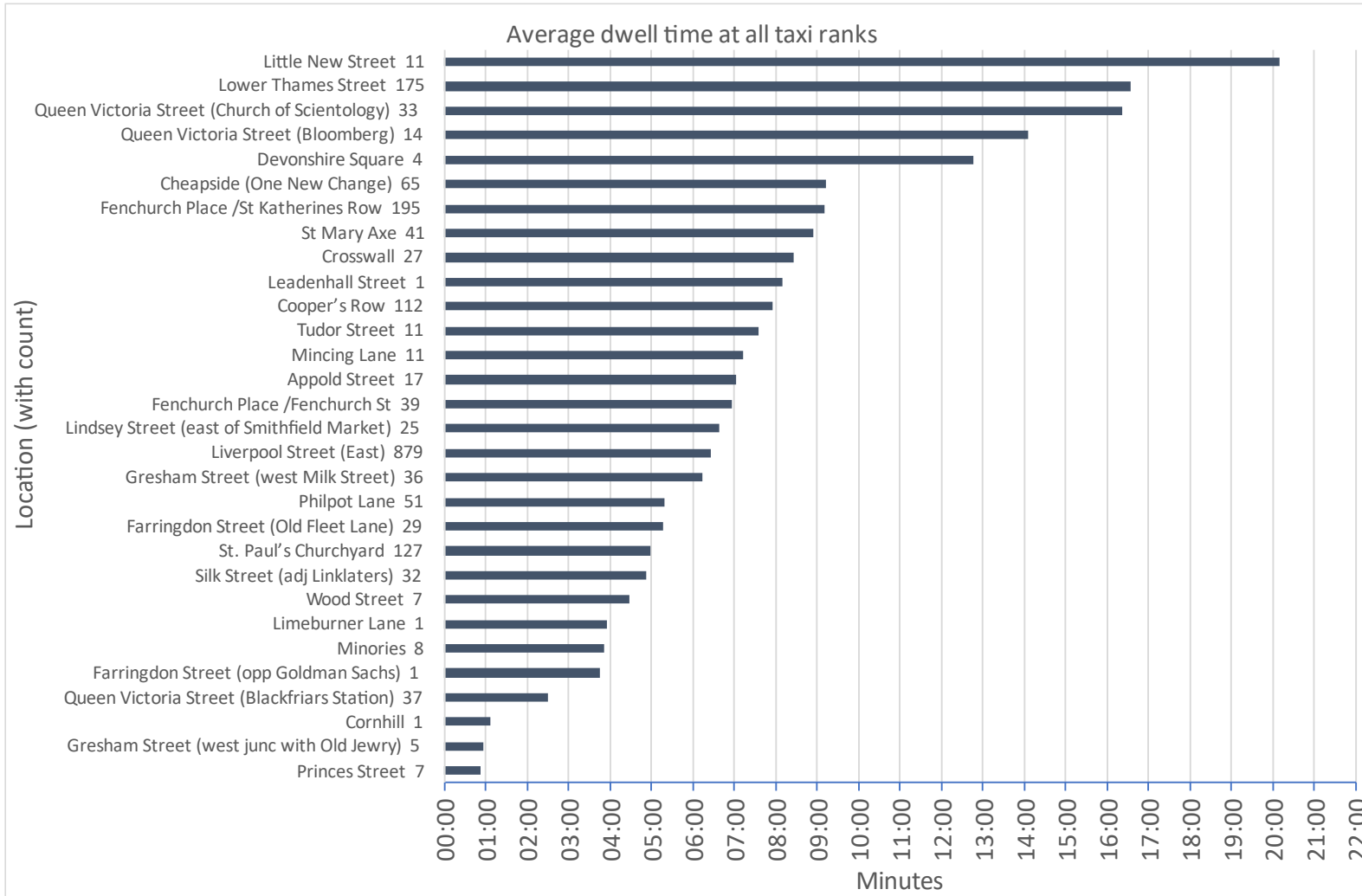
Although there is a variation between dwell time at individual sites, the average for different areas in the City of London are similar. The north of the City has the lowest average dwell time of 6 minutes and 18 seconds, and the East had the highest average dwell time of 10 minutes and 21 seconds (Figure 3-5). Bank area taxi ranks had an average dwell time of 7 minutes and 53 seconds, 1 minute and 7 second less than the average of all sites (after excluding Liverpool Street from the dataset). Despite the longest dwell at the East ranks, there were very high levels of activity at here suggesting that longer dwell times do not appear to discourage/strongly impact rank use.

**Figure 3-5 - Average taxi dwell time at taxi ranks by area**





**Figure 3-6 - Average dwell time for each site, including number of recordings**

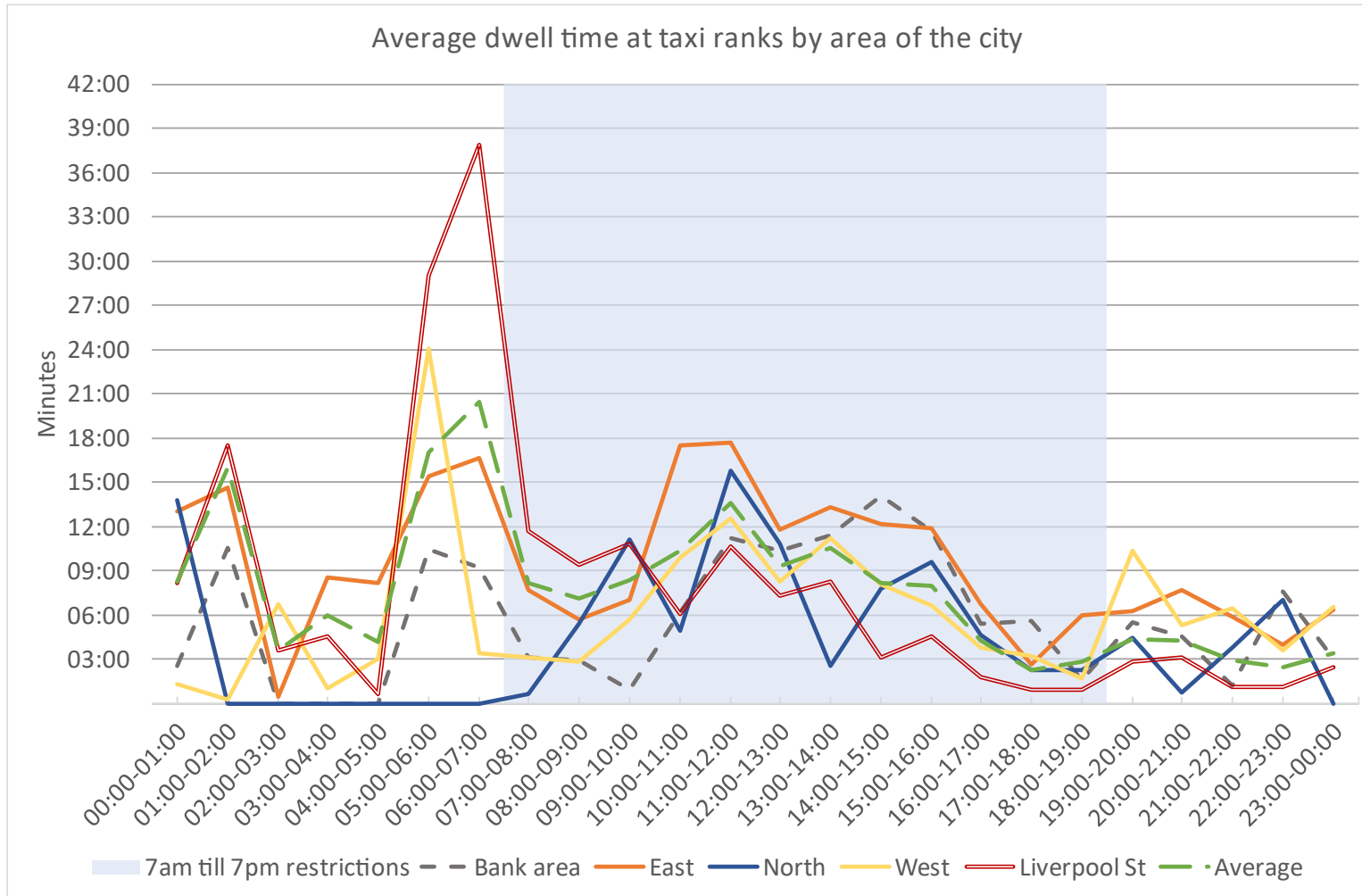




Average dwell time at taxi ranks fluctuates throughout the day, with a longer dwell time seen around 01:00 to 02:00, 05:00 to 07:00, and 11:00 to 12:00 (Figure 3-7).

Dwell times may be higher at certain times of the day for a variety of reasons. Between 05:00 and 07:00 we anticipate dwell times to be higher as taxis may be waiting for people to get into the city, and 11:00 to 12:00 may be the result of drivers taking breaks or getting lunch.

**Figure 3-7 - Average dwell time at taxi ranks by area of the city**



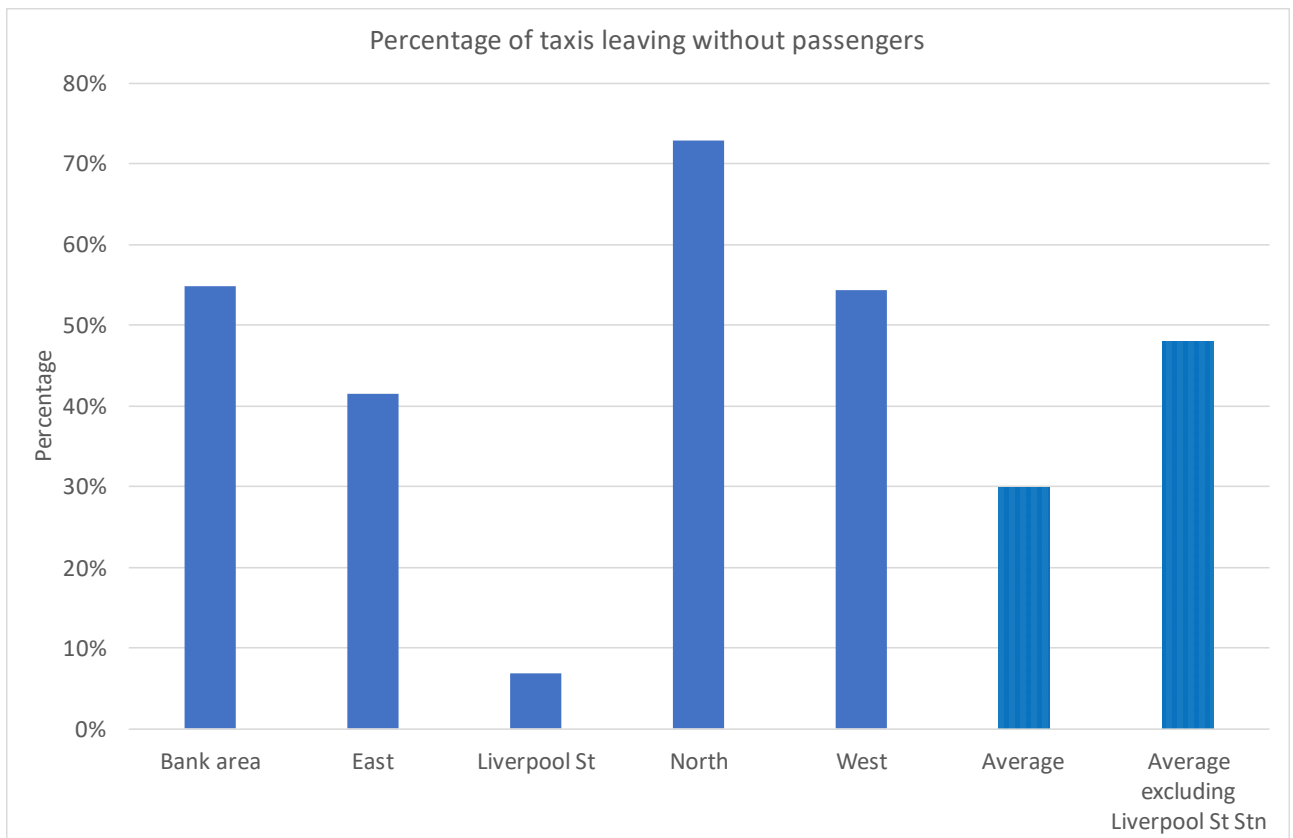
Page 67

\*Liverpool Street has been removed from the North City average.

Analysis has taken place on taxis that did not pick up passengers before leaving the rank. Across all sites, 70% (1402) of the taxis picked up passengers at the taxi ranks, compared to 30% (600) taxis leaving without a passenger. Liverpool Street, the taxi rank with the most counts throughout the day, had less than 10% of taxis leaving without a passenger. This reflects the number of people passing through the station every day.

Bank area had only 7% more taxis leaving without a passenger than what was seen on average though out the City (after excluding Liverpool Street from the dataset).

**Figure 3-8 - Percentage of taxis leaving without passengers**



In conclusion, many ranks in the City are lightly used and there is variance in all areas of the City, however this does not reflect the overall availability of taxis in the areas. Despite some ranks recording low numbers of taxis using them, manual counts show high availability of taxis in the areas.

Moving forward, the City of London should consider taking proactive measures to enhance the efficiency of taxi services. One potential avenue for improvement involves a reassessment of the existing locations of taxi ranks. This process would involve an examination of each rank's usage patterns, taking into account factors such as peak hours, traffic density, and popular destinations.

Some ranks may serve as more than just pick-up and drop-off points; they may currently be serving as rest stops for taxi drivers. The review should involve determining whether certain



taxi ranks are no longer needed. What was once a strategic location for a taxi rank may no longer be as relevant.

## 3.2 RIDE HAILING APPS

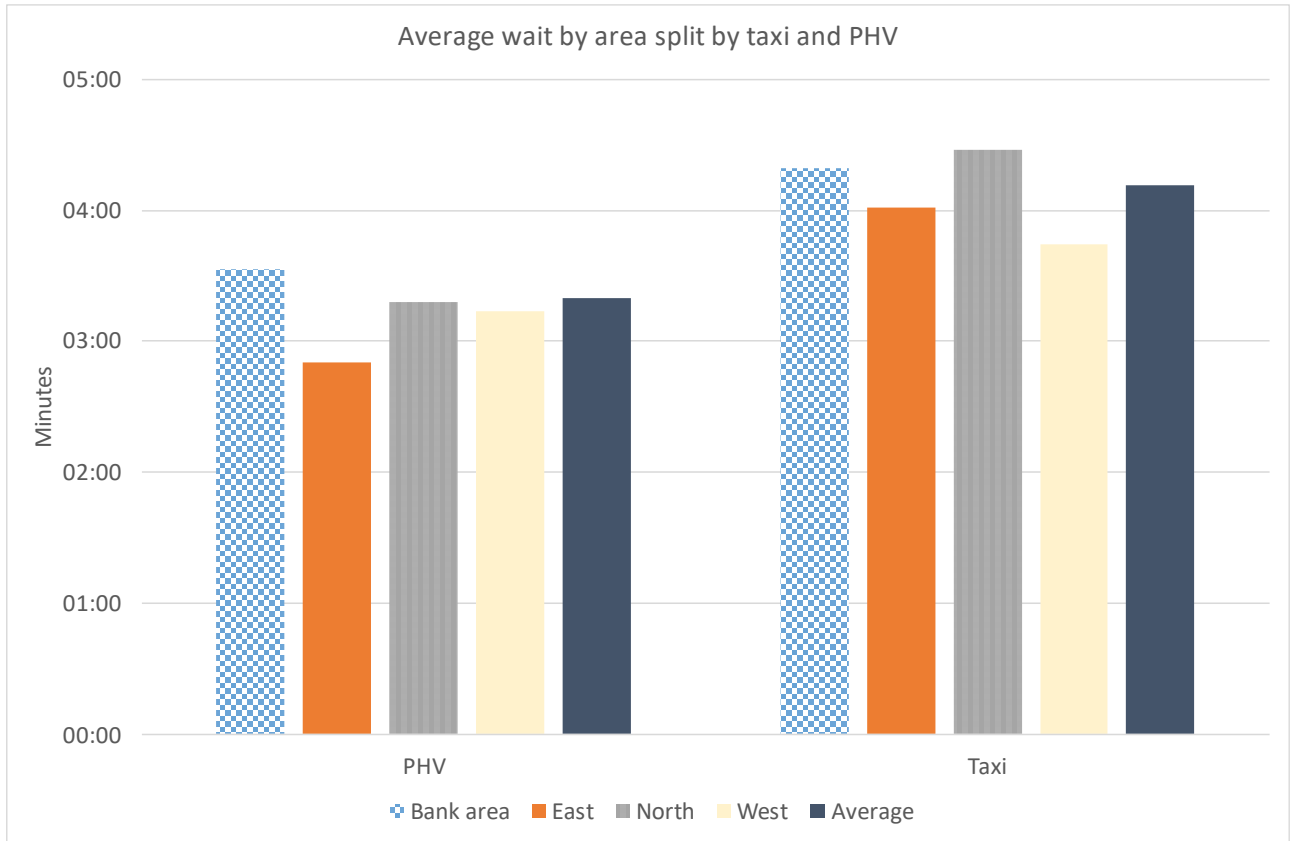
Ride hailing apps were used to estimate the wait time for taxis and PHVs across the city. However, it's crucial to note that these estimations were derived without completing actual bookings. Instead, they were based on the wait time displayed on the app when commencing the booking process. It is possible that these initial estimations may not accurately reflect the actual hire/wait times experienced by users. This discrepancy arises from the fact that drivers need to accept the booking request, which introduces an additional variable in the process. There's also the possibility of cancellations by the driver after accepting the booking, further complicating the accuracy of the estimated wait times.

Throughout this analysis, data has been compared by site and by 'area' as defined in Figure 2-1 (page 7). Analysis has been divided between taxis and private hire vehicles available to hail via the different 'apps'. Due to data quality issues, some recordings were excluded from this dataset. A full explanation of the reasons for exclusions and impacts on processing and analysis can be found in the explanatory note in Appendix E.

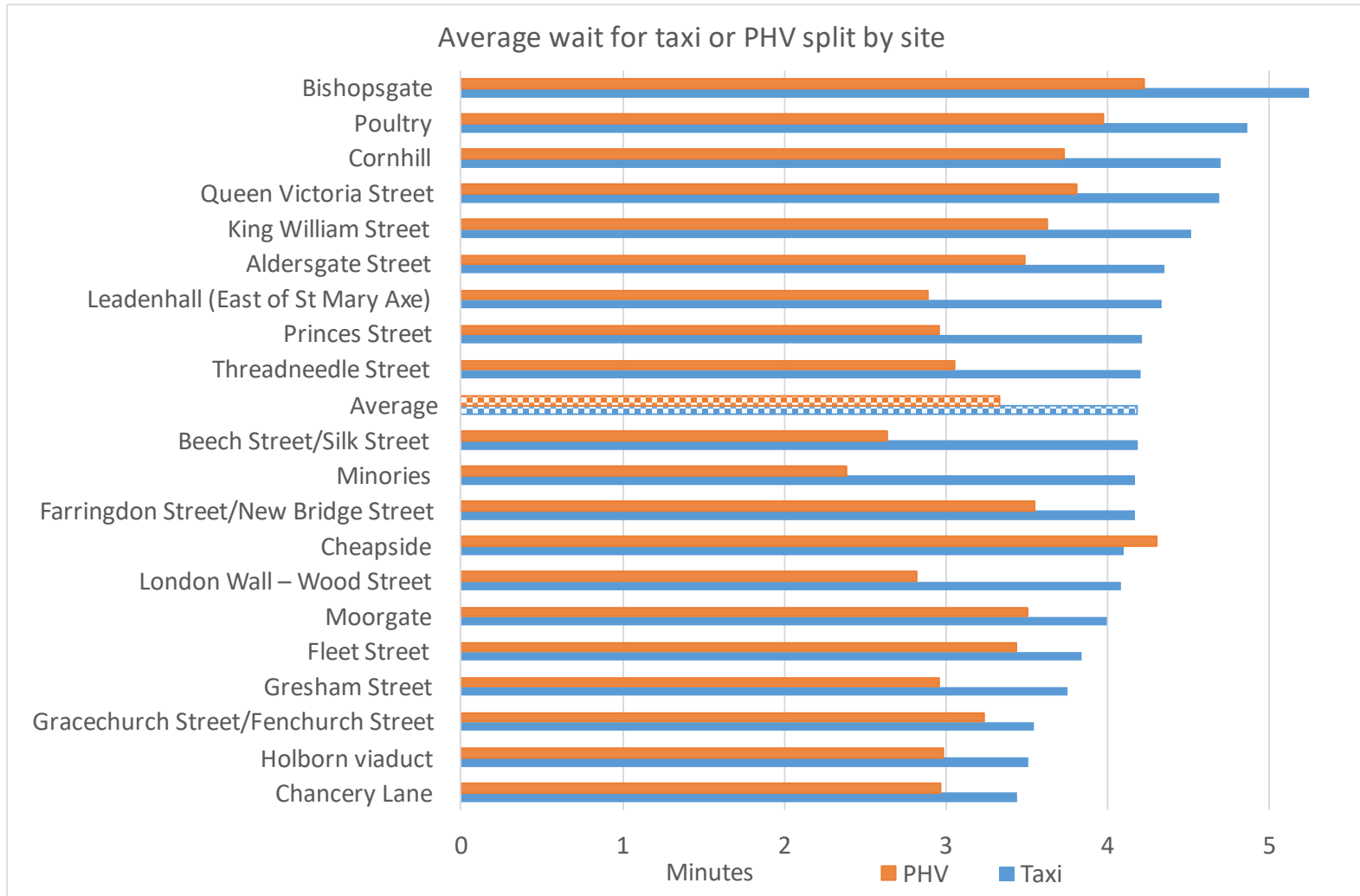
Waiting times for ride-hailing apps exhibited minimal variation across the majority of locations, as the average wait times at most sites were within a one-minute range of the overall average wait time. For PHVs the East had the shortest wait time at 2 minutes and 50 seconds and Bank area had the longest wait time of 3 minutes and 33 seconds. This is only 13 seconds above the average for City of 3 minutes and 20 seconds (Figure 3-9). Taxis across the City had a longer wait time on average, with the West showing the shortest wait time of 3 minutes and 45 seconds and the North the longest wait time of 4 minutes and 28 seconds. The average wait time at Bank was 4 minutes and 20 seconds just longer than the average for City at 4 minutes and 11 seconds.

The breakdown by site in Figure 3-10 (page 34) shows that only Farringdon Street/New Bridge Street had a longer PHV wait time than Taxis. Wait times were longest on Bishopsgate and lowest on Chancery Lane.

**Figure 3-9 - Average wait time for taxis/black cabs across the whole survey period**



**Figure 3-10 - Average wait for taxi or PHV split by site**



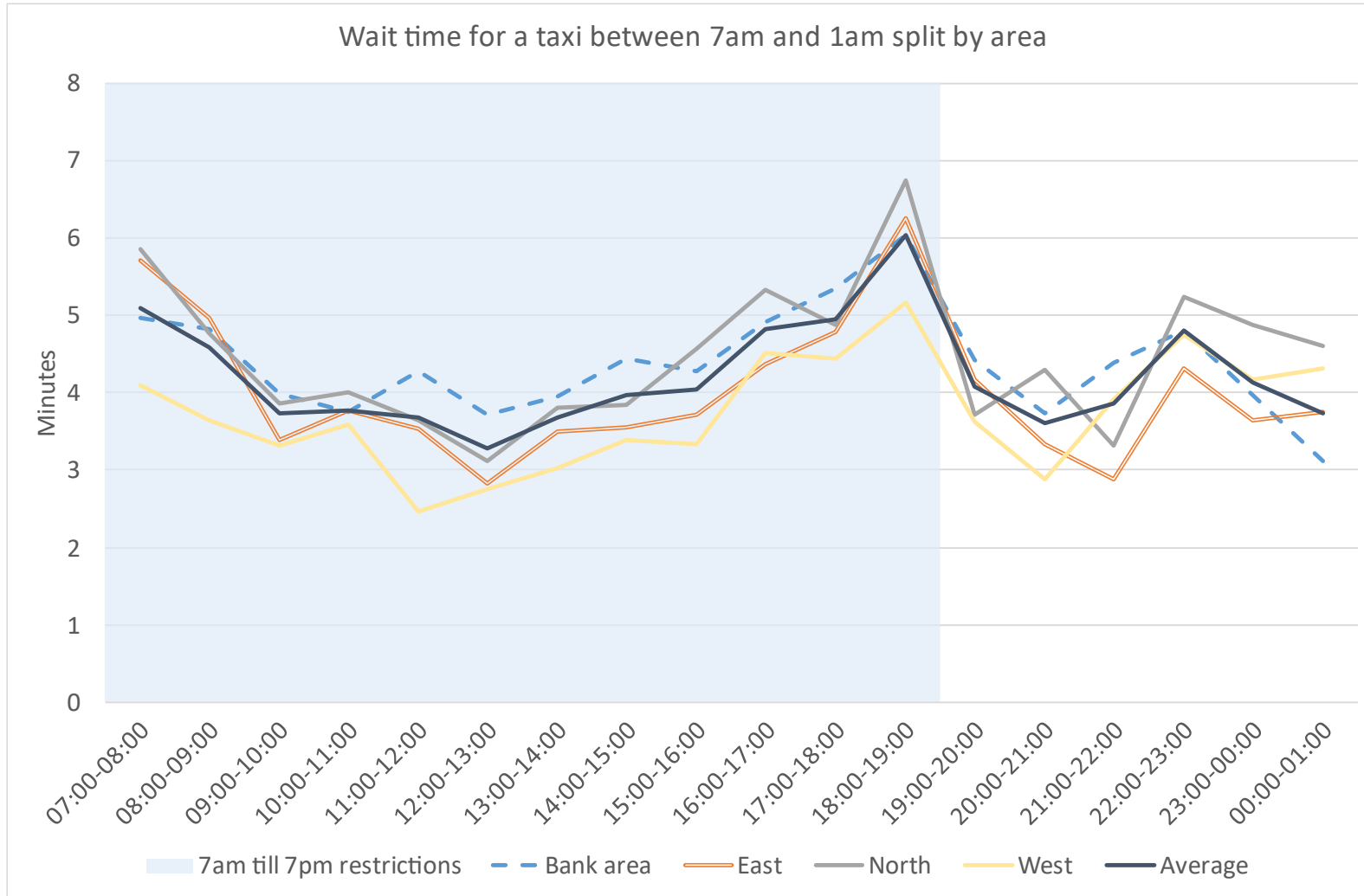




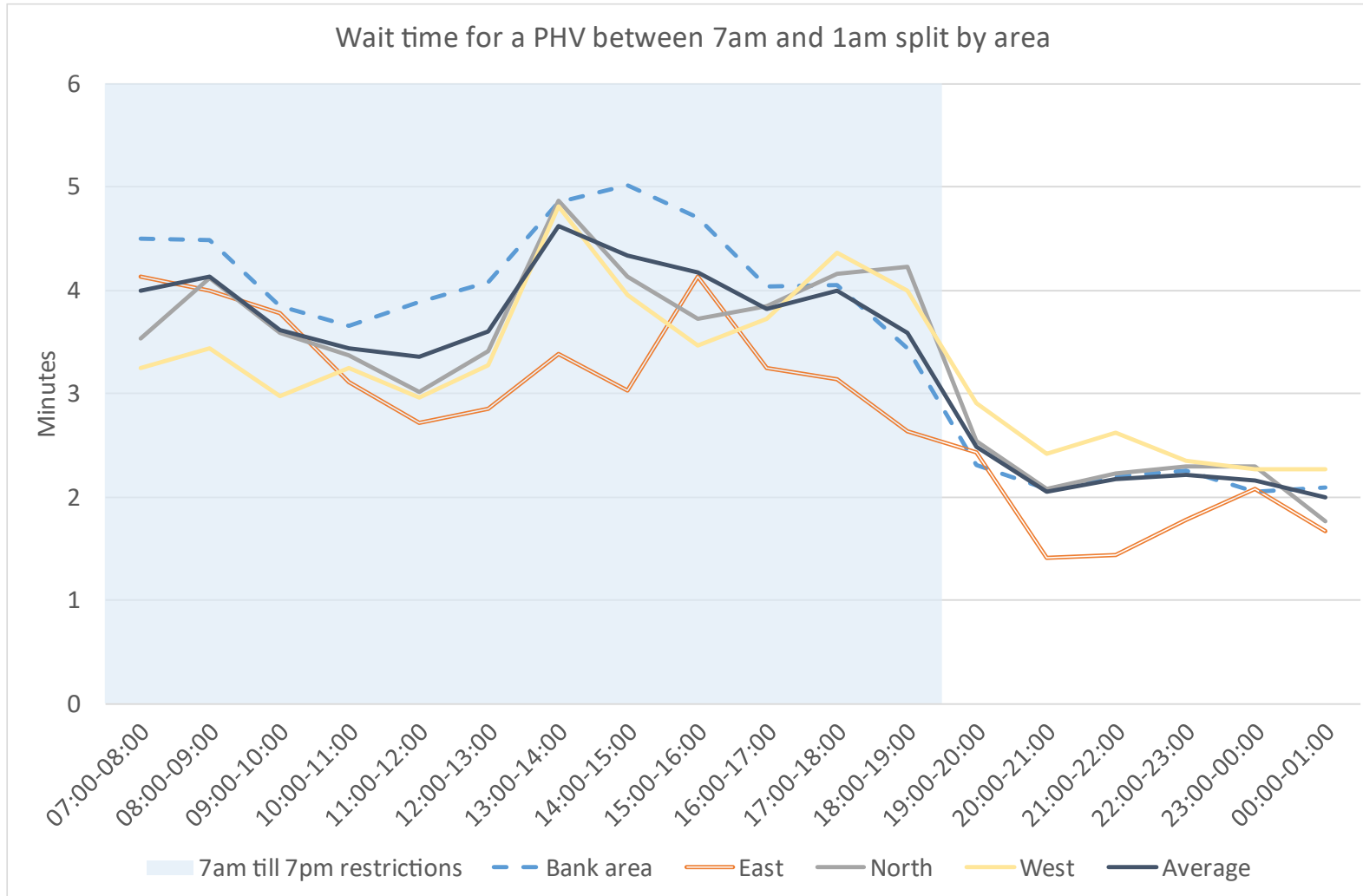
Wait time variations for either taxis or PHV's across areas was low, with longest and shortest wait times differing by a maximum of two minutes. All locations show a lower wait time between 9:00 and 16:00 before peaking at 19:00 (Figure 3-11).

Wait time for PHV's vary slightly more throughout the day. Wait times were highest for PHVs between 07:00 and 17:00 around Bank Junction, but average wait times were never more than 2 minutes longer than other areas, suggesting relatively little variation in absolute wait times in different parts of the City at that time of day. After 17:00 the West shows the highest wait time for most of the survey period except 18:00-19:00 where the North exceeds it (Figure 3-12, page 37).

**Figure 3-11 - Wait time for taxis by area**



**Figure 3-12 - Wait time for PHVs by area**





The key findings from this data collection exercise show minimal variations in wait times across the city. For both PHVs and taxis, the recordings in Bank area were within 20 seconds of the average for other areas. It appears to show there is little to no impact on wait times as a result of Bank junction restrictions. There are minor increased in wait times at the peak time of 18:00. This is expected as this is when there would be high demand at the end of the working day. Even at peak wait time this is only seven minutes. At 19:00 a small reduction in wait times can be seen by all areas, this could be as a result of vehicles becoming available again, or due to the end in restrictions.

On a location by location basis those streets with restrictions, such as limited access or time constraints, tend to have longer average wait times for a taxi via an app than those streets without. However, the average time difference is not significant.

### **3.3 WESTMINSTER DATA**

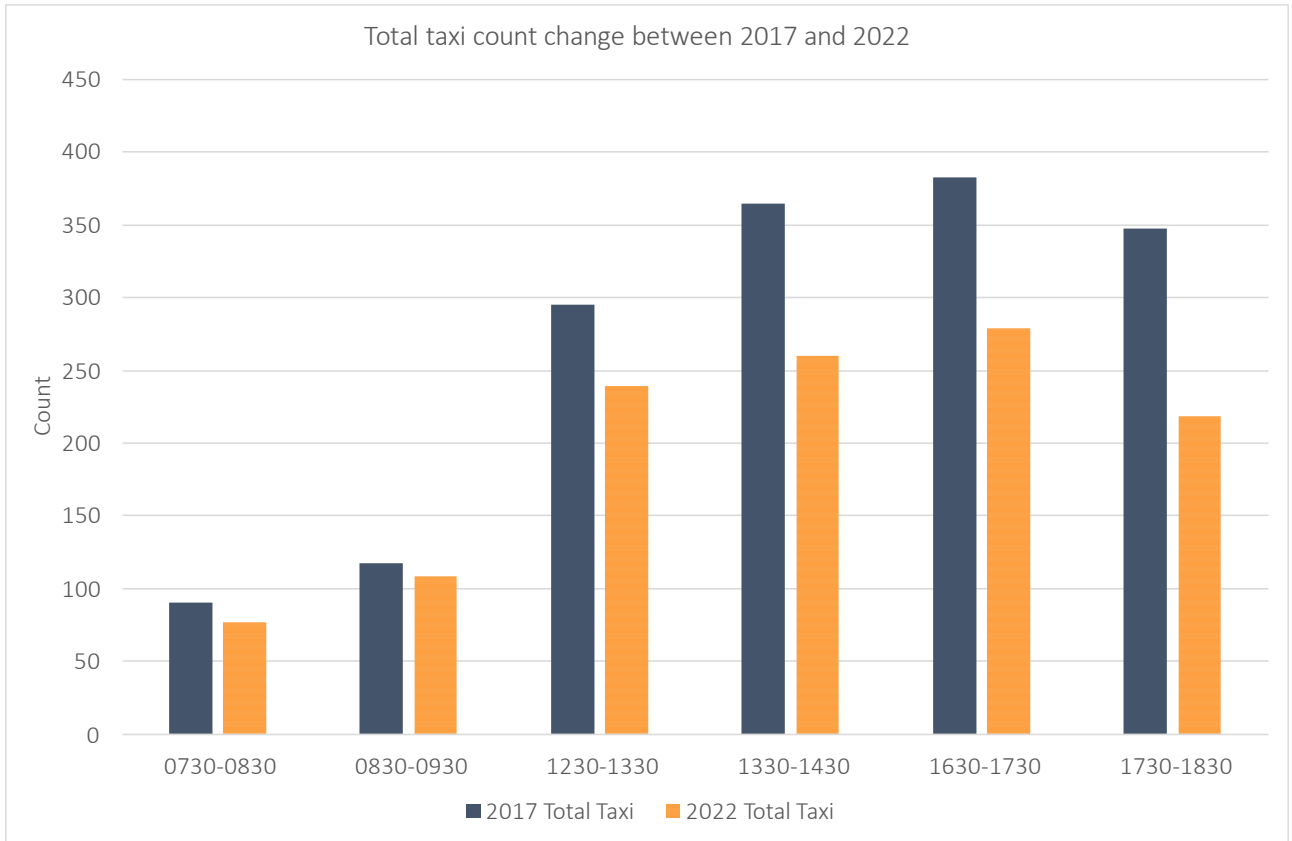
The evolution of taxi volumes in Westminster before and after the onset of the COVID-19 pandemic was investigated by considering several metrics including the proportion of taxis within the overall traffic, the absolute number of taxis by day, and data segmented by hourly intervals. The data was collected by Westminster City Council at several sites in 2017 (pre COVID-19) and 2022. It should be noted that traffic volume may have increased since the last set of data collection was undertaken as the return to the office in 2023 was more pronounced.

#### **3.3.1 OXFORD STREET**

Oxford Street in Westminster has experienced a substantial decline in the overall number of taxis since 2017. The most significant drop in the number of taxis occurred between 17:30 and 18:30, where a 37% decrease was observed. In contrast, the period from 08:30 to 09:30 witnessed the least decline in taxi numbers, with only an 8% reduction (Figure 3-13, page 40). On average, across all time intervals, there was a 26% decrease in taxi availability. This follows the expected wider pattern in London which shows the number of taxis travelling through the congestion zone in operational hours has fallen approximately 40% between 2017 and 2022, and that taxi licenses fell by approximately 30% in the same time (Section 4).

Oxford Street data is represented hour by hour in the graph below, for the two-hour AM and PM peaks and the lunchtime two-hour peaks.

**Figure 3-13 - Oxford Street taxi numbers between 2017 and 2022**



The broader traffic trends in Westminster show an average 36% decrease in traffic volume from 2017 to 2022 across all time periods. The most significant drop in the number of vehicles occurred between 07:30 and 08:30 where a 42% drop was observed. Between 12:30 and 13:00 saw the least reduction in vehicles, at a 29% reduction (Figure 3-14).

**Figure 3-14 - Oxford Street vehicle numbers between 2017 and 2022**

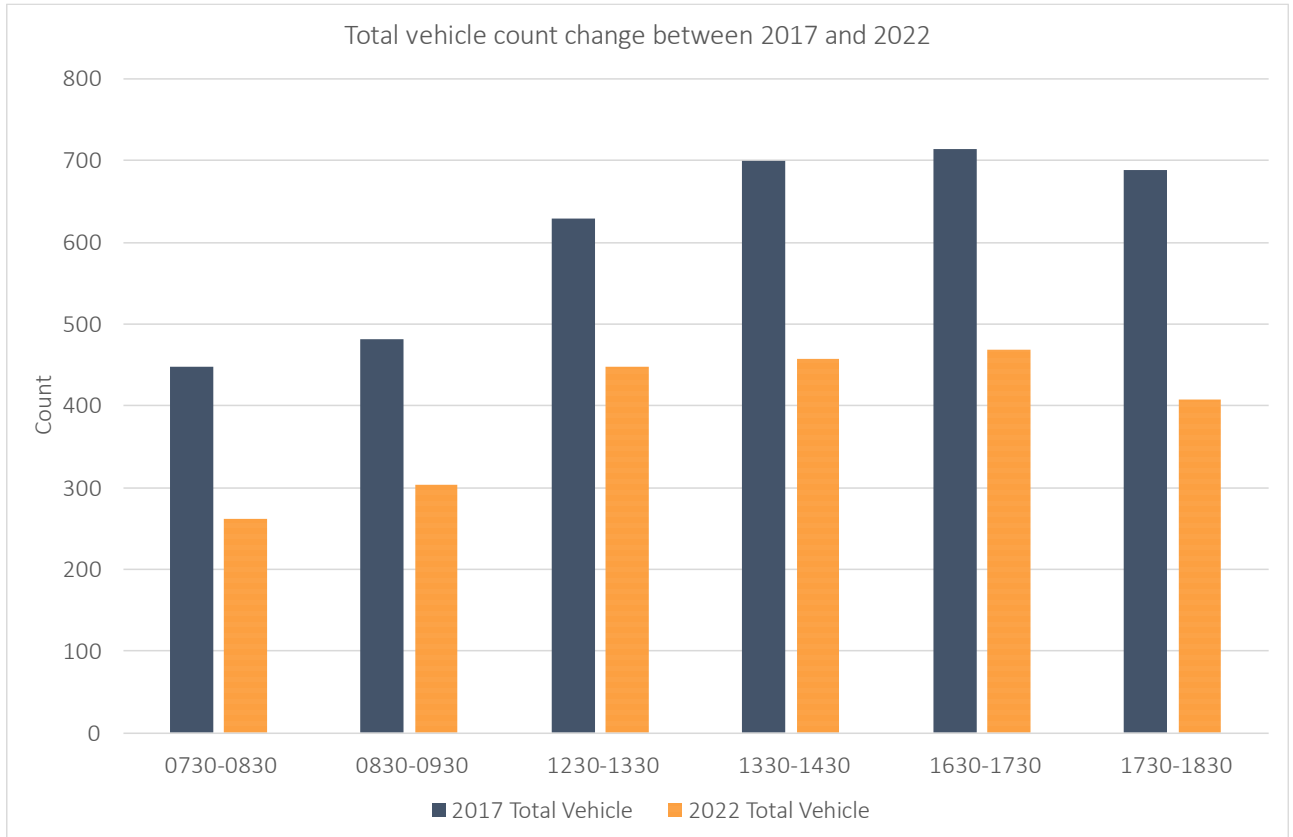
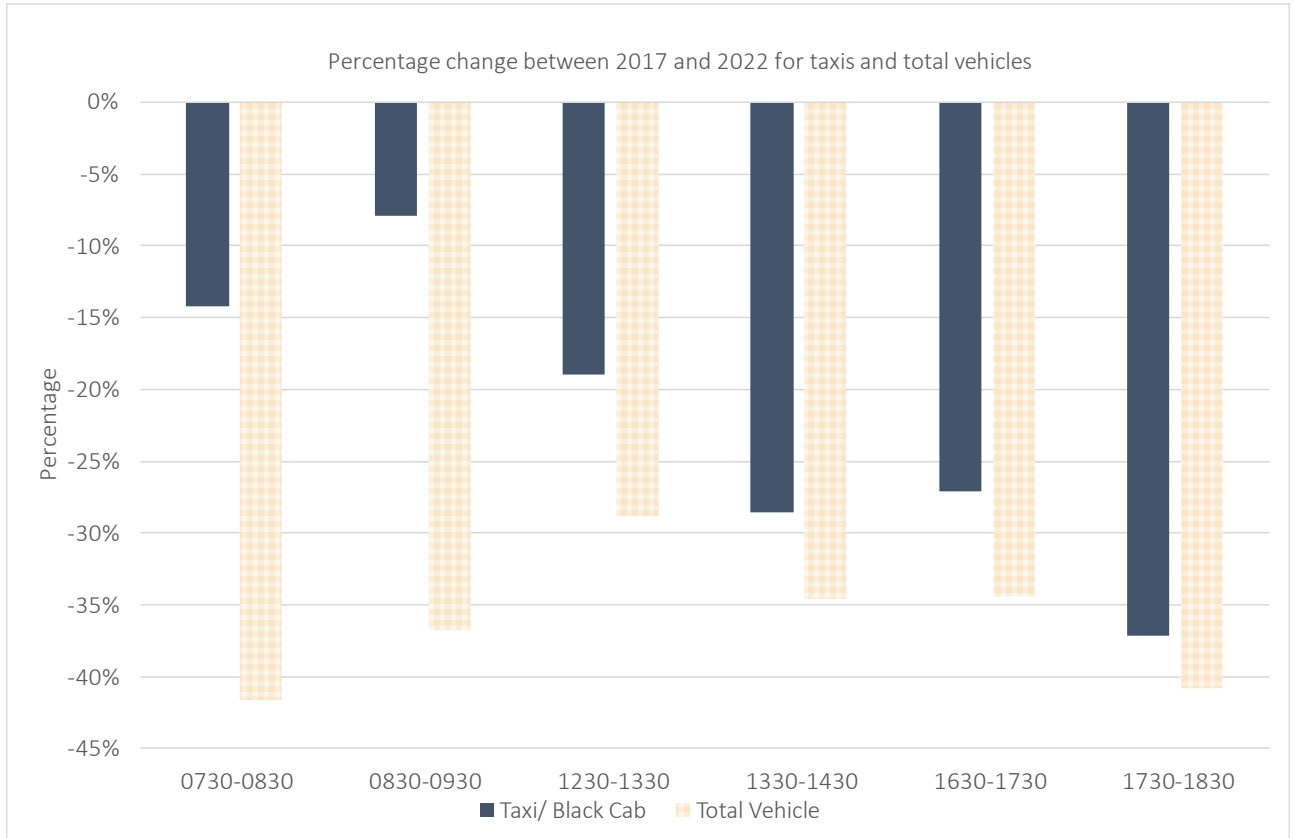


Figure 3-15 shows that taxi/ black cab numbers have fallen less than total vehicle counts across all time periods.

**Figure 3-15 - Percentage change between 2017 and 2022 for taxi/black cabs and total vehicles**

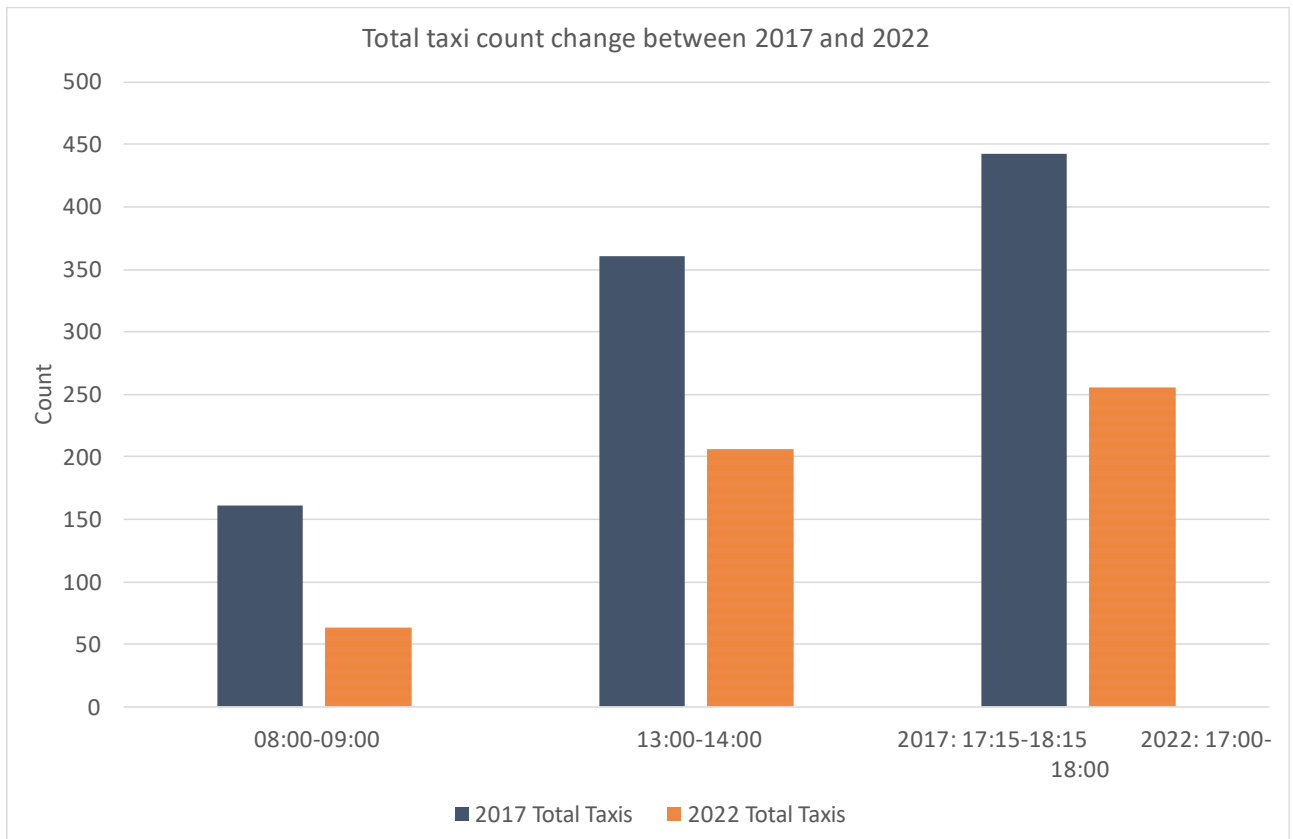




### 3.3.2 REGENT STREET

Taxi numbers on Regent Street in Westminster has experienced a 46% decrease between 2017 and 2022. The most significant drop in the number of taxis occurred between 08:00 and 09:00, resulting in a 61% decrease, there was a 43% decrease in taxis between 13:00 and 14:00, and a 42% reduction between 17:15 and 18:15 (2022: 17:00 and 18:00). This reduction follows patterns seen in the wider London area of the number of taxis travelling through the congestion zone in operational hours falling approximately 40% between 2017 and 2022, and taxi licenses falling by approximately 30% in the same time (Section 4).

**Figure 3-16 - Total taxi count change between 2017 and 2022**



The broader traffic trends on Regent Street show an average 18% decrease in traffic between 2017 and 2022 for all time periods. There was a 13% decrease in traffic between 08:00 and 09:00, a 27% decrease in traffic between 13:00 and 14:00, and a 15% decrease between 17:15 and 18:15 (2022: 17:00-18:00) (Figure 3-17).

**Figure 3-17 - Total vehicle count change between 2017 and 2022**

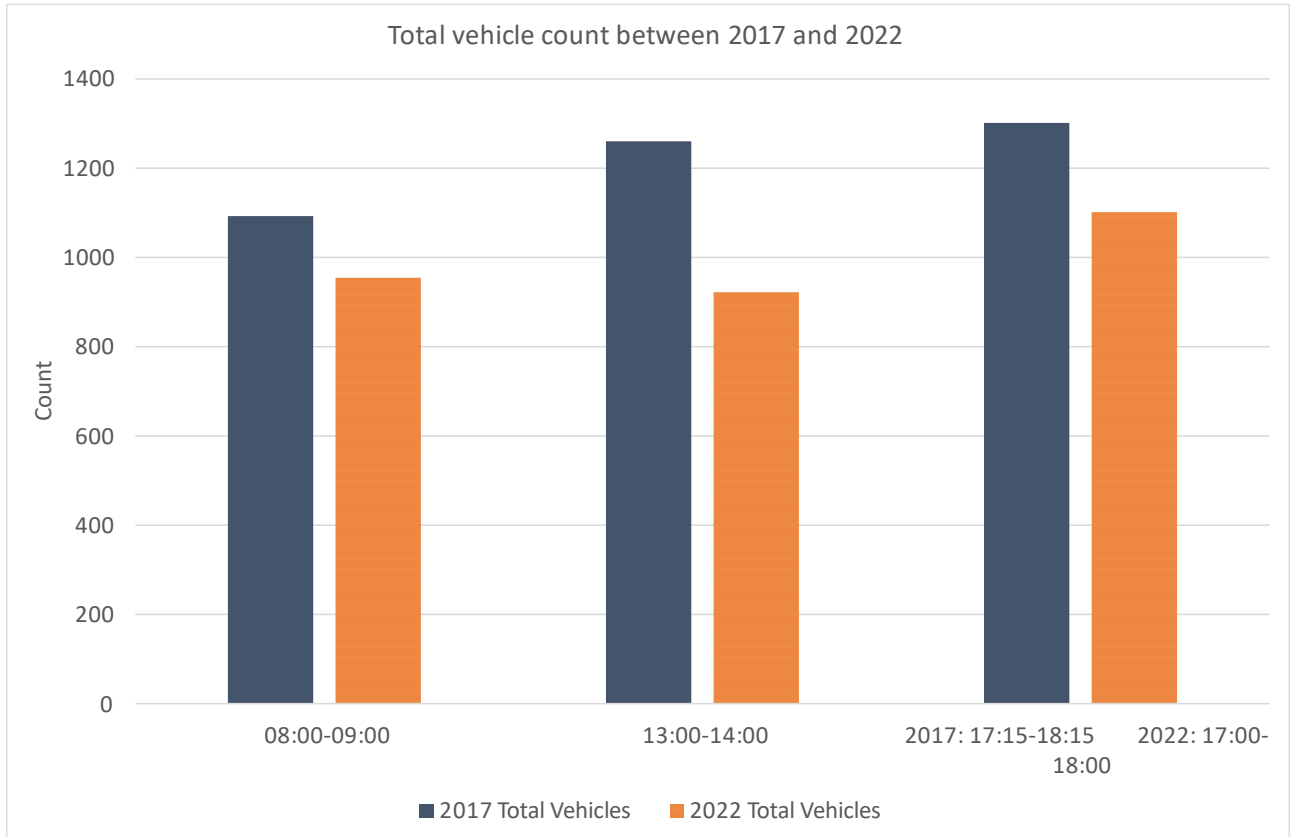
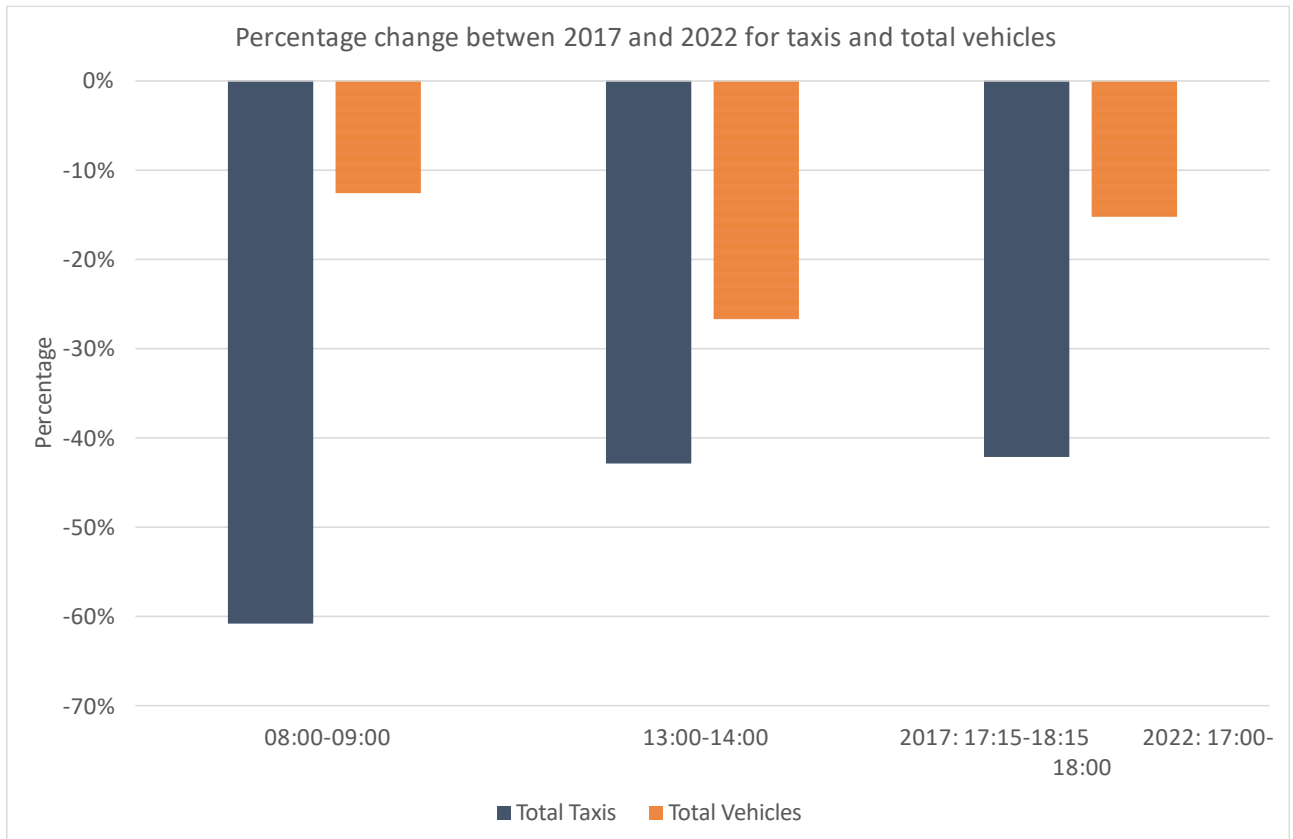


Figure 3-18 shows that taxi/ black cab numbers have fallen more than total vehicle counts across all time periods. This is particularly evident between 08:00 and 09:00 where taxi/ black cab availability has fallen over 60%, but vehicle counts only 13%.

**Figure 3-18 - percentage change between 2017 and 2022 for taxi/black cabs and total vehicles**



### Westminster and City of London Comparison

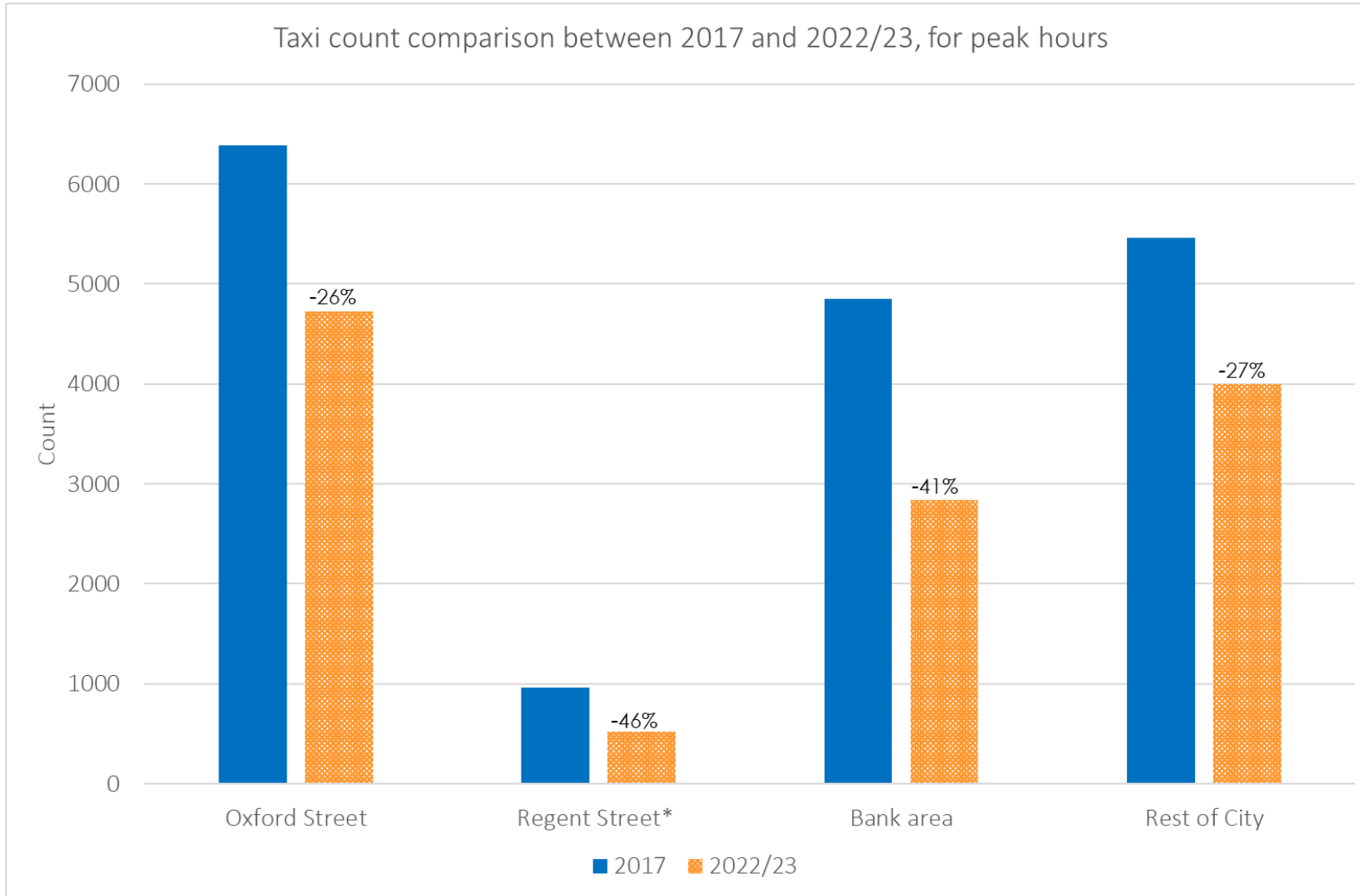
Comparison between Westminster and the City of London locations can be seen in Table 3-2 and Figure 3-19 (page 47). All locations saw more than a 25% decrease in taxi volumes from 2017 to 2022/23. The minimum change was 26% reduction seen by Oxford Street locations, and the maximum change was seen in the Regent Street location at 46% reduction. Bank area has a 41% reduction in taxis.

**Table 3-2 - Taxi number comparison between 2017 and 2022/23, for peak hours (approx. 08:00-10:00, 12:00-14:00, 17:00-19:00) \* for multiple sites**

	2017 taxi volumes	2022/23) taxi volumes	Absolute change	% change
Oxford Street	6389	4729	-2660	-26%
Regent Street*	965	525	-440	-46%
Bank area	4846	2840	-2006	-41%
Rest of City	5457	3999	-1458	-27%

*\*Regent Street sites peak hour counts were for one hour only.*

**Figure 3-19 - Taxi number comparison between 2017 and 2022/23, for peak hours for multiple sites**





Overall, this data collection suggests that drops in taxi volumes are not unique to the City, or in particular the Bank area. Both areas analysed in Westminster saw a reduction of taxis from between 2017 and 2022/23 (-26% and -46%). This is also the pattern shown in the Bank area (-41%). This is supported by information in Section 4 which shows that the number of taxis travelling through the congestion zone in operational hours has fallen approximately 40% between 2017 and 2022, and that taxi licenses fell by approximately 30% in the same time.

### 3.4 MANUAL TAXI AVAILABILITY SURVEY

Manual taxi count surveys were undertaken to record the number of taxis passing the survey location in both directions, whether they have their lights on or off and how many passengers they were carrying.

Throughout this analysis, data has been compared by site and by ‘area’ as split out in Figure 2-1 (page 7). In total 56,450 taxis were counted in 2016 across 17 sites, these were counted before restrictions were implemented. In comparison, 23,307 taxis were counted at the same sites in 2023 after the restrictions were implemented. The 2023 data recorded the Bank area having 5,030 recorded taxis, East has 766, North 7,204, and West 10,307.

In total, 20 sites were analysed in 2023. 17 of these locations were compared to data from 2016 and the three additional sites were Chancery Lane, Leadenhall and Minories.

Table 3-3 is split into 5 colours ranging from white to dark blue. It is visible that many locations had hour time slots with 0 or less than 6 taxis an hour passing with their light on, with the minimum average wait for taxi being 10 minutes. Cheapside had the least available taxis with only 18 passing in the complete survey period, followed by Queen Victoria Street with 35 taxis.

Holborn Viaduct and Fleet Street had the most frequent taxis per hour, with over 60 taxis per time slot, with a maximum average wait time of around one minute on these roads.

#### Key

Colour	Count of taxis
Grey	Non operational hours
White	0
Light blue	1-5
Medium blue	6-11
Medium/dark blue	12-59
Dark blue	60+

**Table 3-3 - Heat map showing number of taxis with their light on by locations for 24 hours**

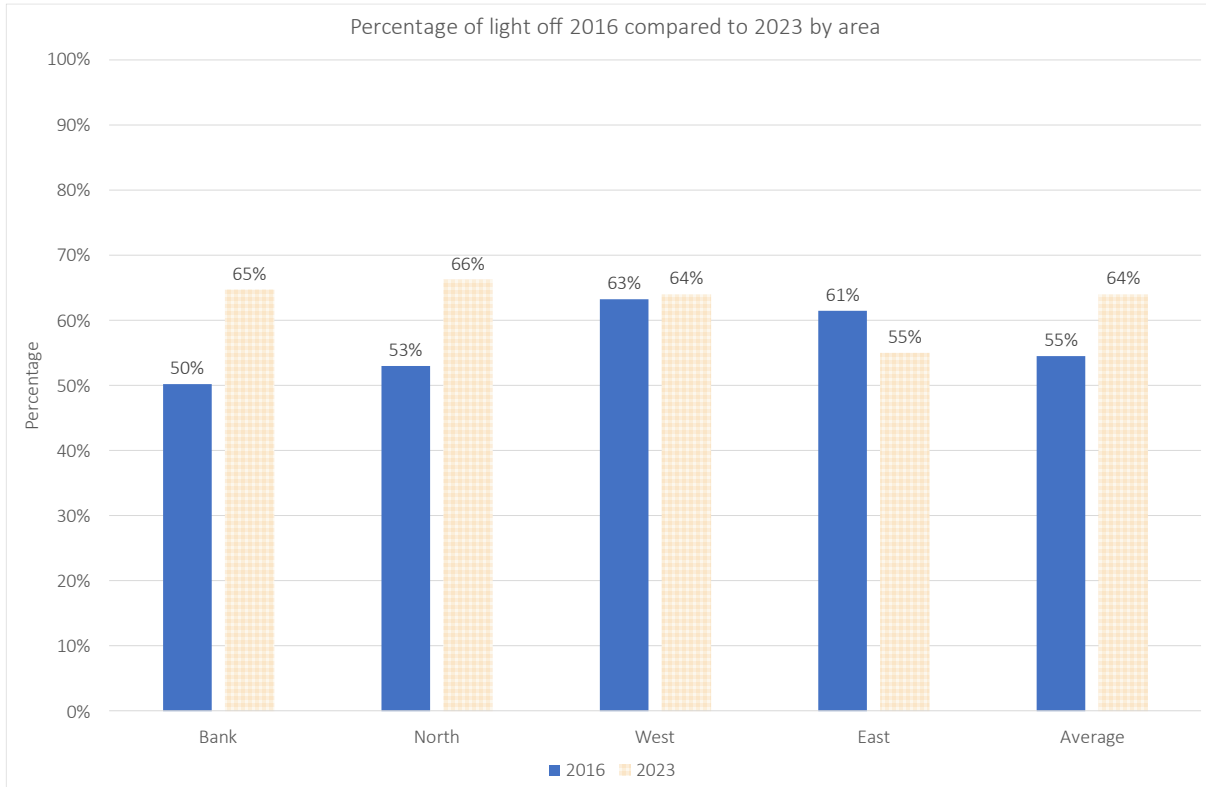
	7-8am	8-9am	9-10am	10-11am	11-12am	12-1pm	1-2pm	2-3pm	3-4pm	4-5pm	5-6pm	6-7pm	7-8pm	8-9pm	9-10pm	10-11pm	11-12am	12-1am	Total
Aldersgate Street	18	42	52	34	50	40	42	32	38	16	85	58	31	75	40	5	30	33	721
Beech Street/Silk Street	33	16	38	41	47	46	24	39	26	41	41	59	69	54	84	46	14	24	742
Bishopsgate	10	7	15	16	19	18	26	17	9	3	5	16	41	109	85	22	78	77	573
Chancery Lane	2	10	16	21	39	40	43	49	34	56	34	6	11	17	14	1	3	2	398
Cheapside	0	0	0	2	0	0	4	0	0	0	1	0	0	1	2	0	1	0	11
Cornhill	1	4	1	4	5	6	4	10	7	5	1	1	0	3	7	6	4	5	74
Farringdon /New Bridge St	12	24	25	41	47	37	48	22	44	40	32	18	25	37	24	9	13	9	507
Fleet Street	45	52	85	87	133	95	131	146	86	108	79	11	35	123	43	6	13	23	1301
Gracechurch/Fenchurch St	17	29	33	40	29	29	20	25	16	8	14	12	20	17	18	9	4	5	345
Gresham Street	16	34	22	55	45	53	43	35	39	54	64	35	40	25	12	11	5	12	600
Holborn Viaduct	44	71	159	95	192	124	143	119	95	120	151	27	155	185	26	85	93	15	1899
King William Street	3	1	0	1	1	2	0	2	8	2	9	2	14	15	16	12	7	13	108
Leadenhall	4	6	12	18	34	47	43	33	37	27	16	8	32	24	16	14	7	6	384
London Wall - Wood Street	16	27	42	51	38	42	53	48	43	46	30	11	27	53	32	9	9	9	586
Minories	24	19	13	27	57	61	55	45	41	47	26	13	39	24	18	17	9	9	544
Moorgate	4	17	23	38	33	33	21	17	17	31	16	14	30	25	14	4	5	7	349
Poultry	3	2	2	1	4	8	1	1	2	1	3	3	5	14	5	11	5	9	80
Princes Street	2	4	1	3	4	3	8	11	2	23	21	25	60	54	28	38	19	15	321



	7-8am	8-9am	9-10am	10-11am	11-12am	12-1pm	1-2pm	2-3pm	3-4pm	4-5pm	5-6pm	6-7pm	7-8pm	8-9pm	9-10pm	10-11pm	11-12am	12-1am	Total	
Queen Victoria Street	4	0	0	0	1	0	2	1	2	2	0	0	0	0	0	0	0	0	0	12
Threadneedle Street	9	16	23	18	23	24	18	20	20	13	7	6	7	4	4	1	3	4	4	220

14 out of 17 sites have had an increase in percentage of taxis with their light off, showing more taxis are unavailable in 2023 compared to 2016 (Figure 3-21).

**Figure 3-20 - Percentage of light off 2016 compared to 2023 by area**



In figure 3.20

Of these taxis with the light off, on average across the full survey period, 75% of taxis in Bank had passengers in. This compared to of 85% in the North, 70% in East and 84% in the West (Figure 3-20). This shows that although Bank had the greatest increase in proportion of taxis with their lights off in the area, they have approximately the same likelihood that lights off are due to carrying passengers and there is no evidence to suggest that taxis are turning lights off and dead running around Bank to other locations.

**Figure 3-21 - Percentage of taxis counted with their light off comparison 2016 compared to 2023 split by all sites**

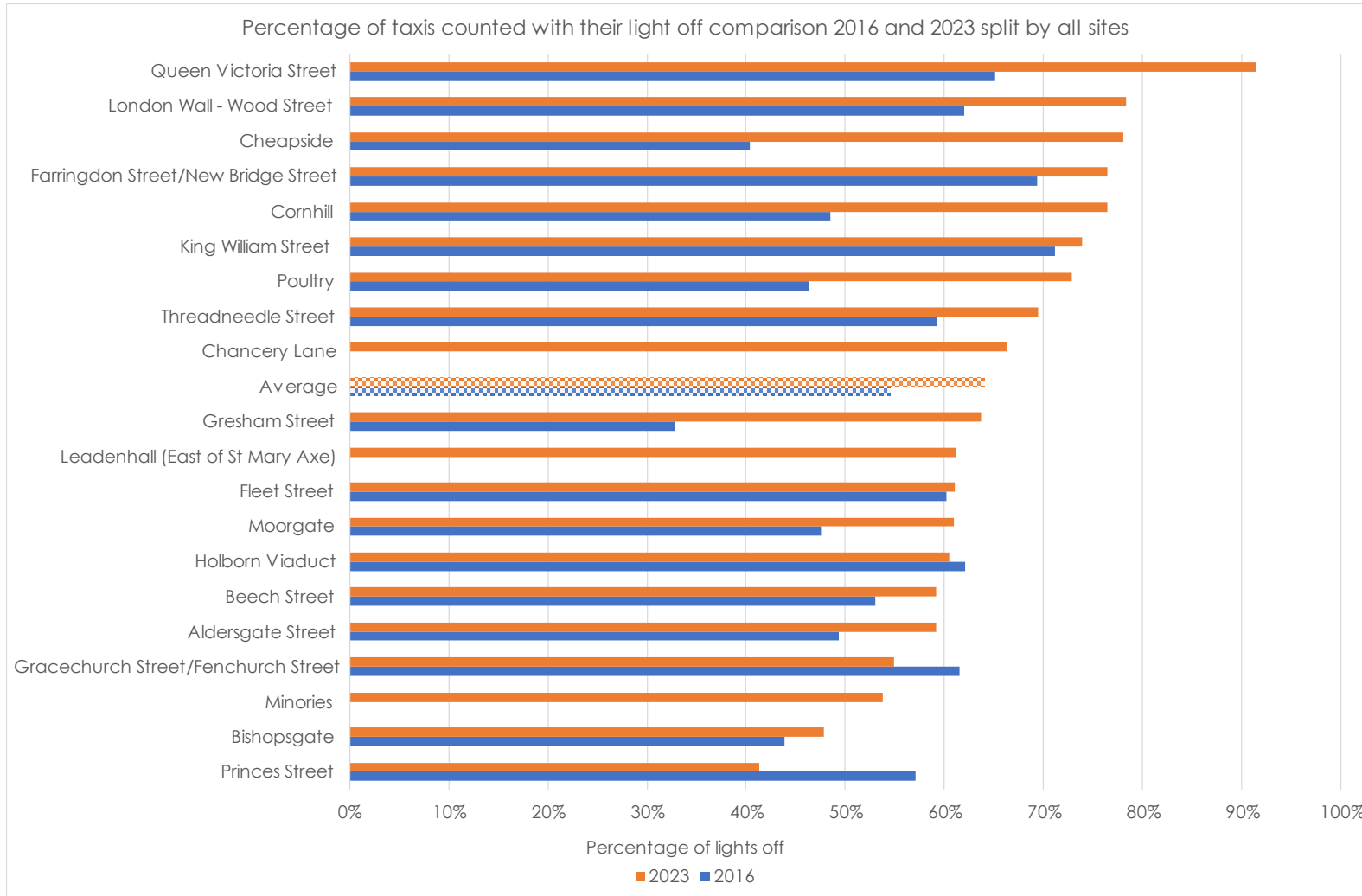
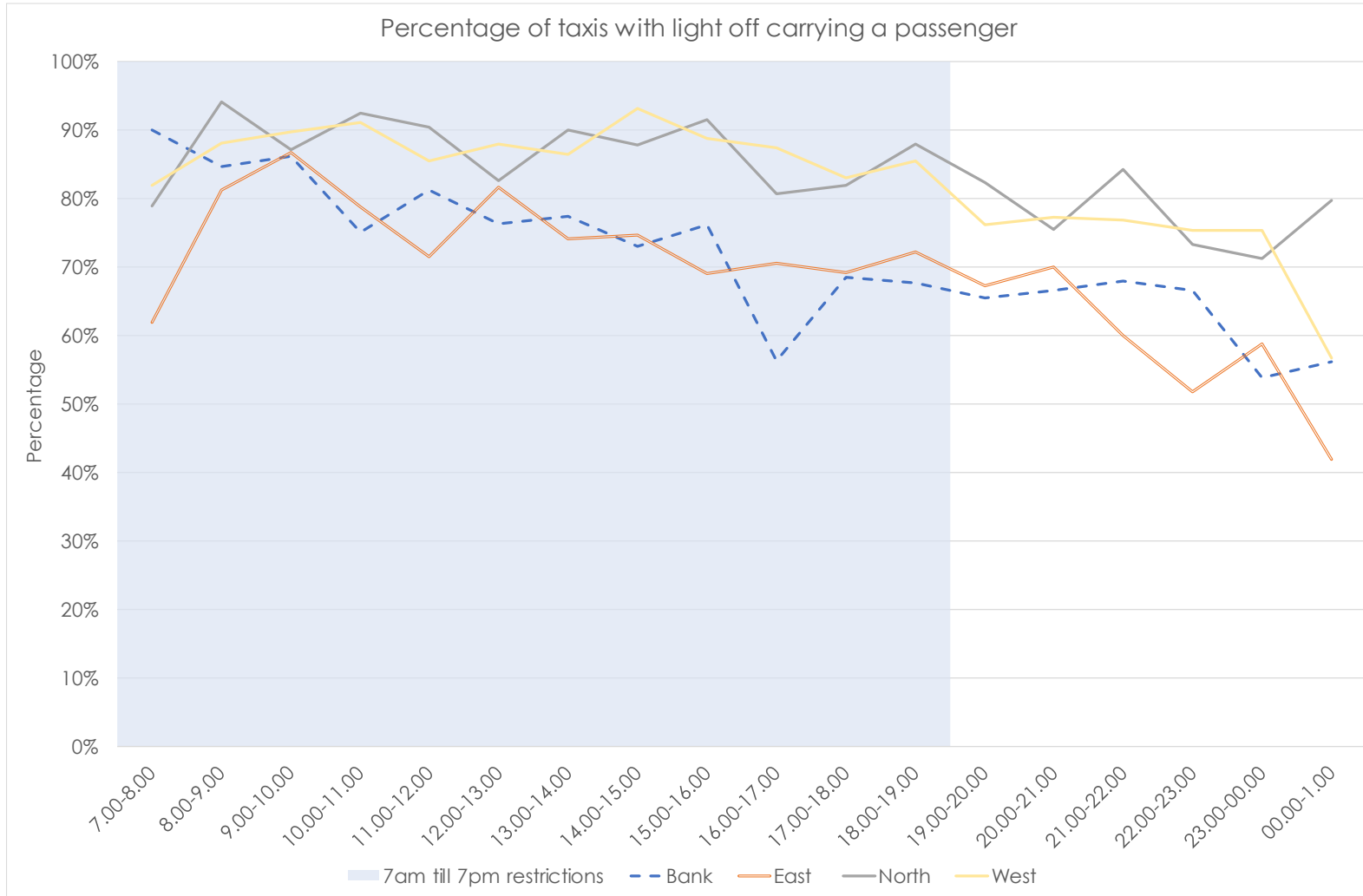


Figure 3-22 shows that the majority of taxis with their lights off are carrying passengers, and that Bank area is comparable to the East, but the North and West areas have a slightly higher percentage with passengers in.

Bank recorded the highest occurrence of taxis operating with their lights off but empty between 16:00 and 17:00, and 23:00 and 00:00, during which approximately 55% of such taxis were occupied. In the East, the highest count of empty taxis occurred from 00:00 to 01:00, with only 42% taxis carrying passengers. The West exhibited the lowest proportion of empty taxis between 00:00 and 01:00, standing at 57% containing passengers. The North experienced the highest percentage of occupied taxis throughout the day, remaining at over 70%.

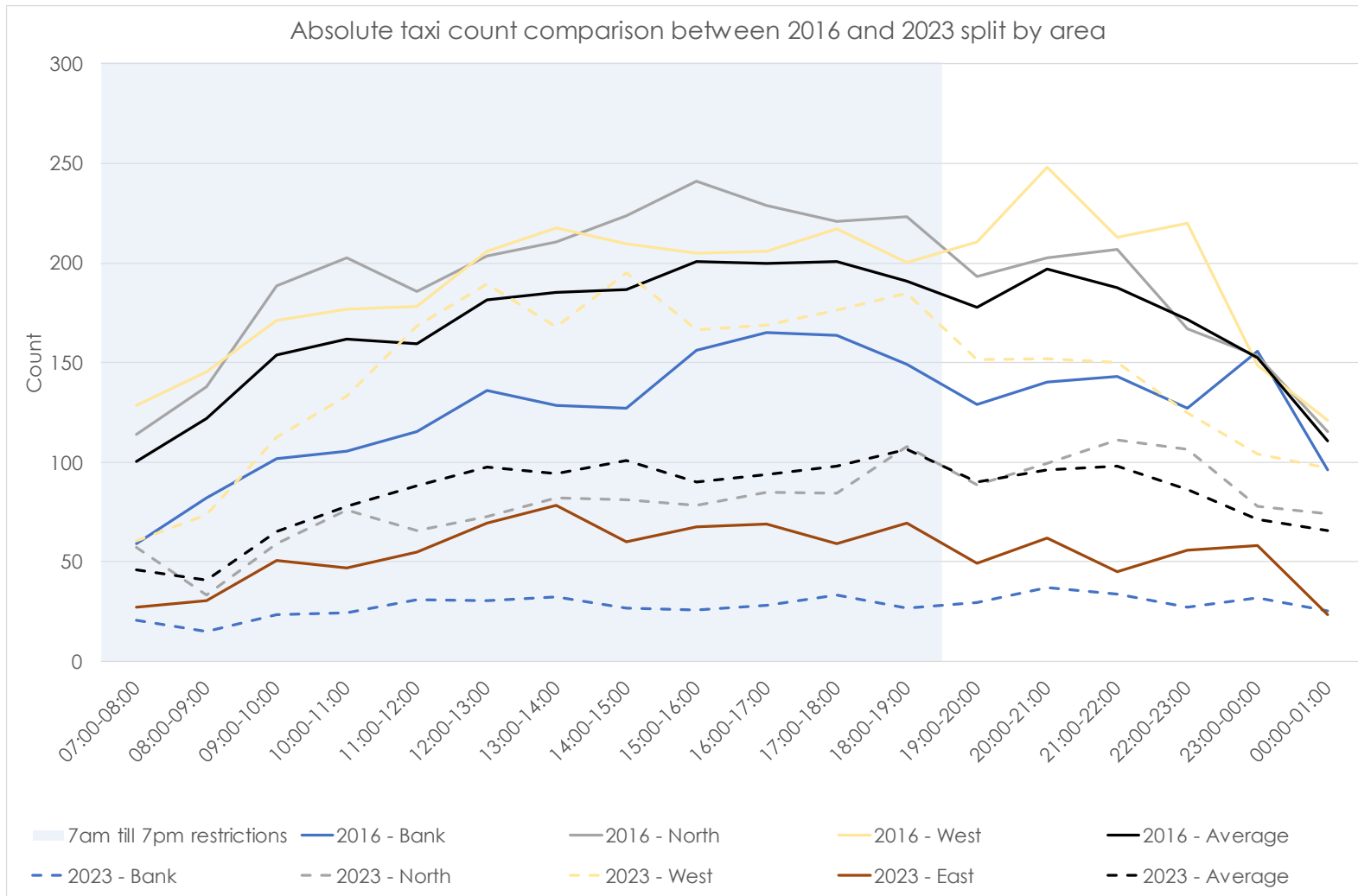
Comparing the manual count availability surveys with the taxi rank usage on the same streets draws little conclusions from the dataset. Cheapside with the 2023 restriction in place (not allowing taxis through) still had relatively high taxi rank usage. It is likely this is increased due to its location outside One New Change. Farringdon Street has a high number of taxis travelling along it with lights on, but very low taxi rank usage which is a similar situation to Leadenhall Street. As above, a rank review could be undertaken with the taxi trade to consider how to optimise their use or repurpose if ranks are no longer as necessary with hailing apps.

**Figure 3-22 - Percentage of taxis with light off carrying a passenger**

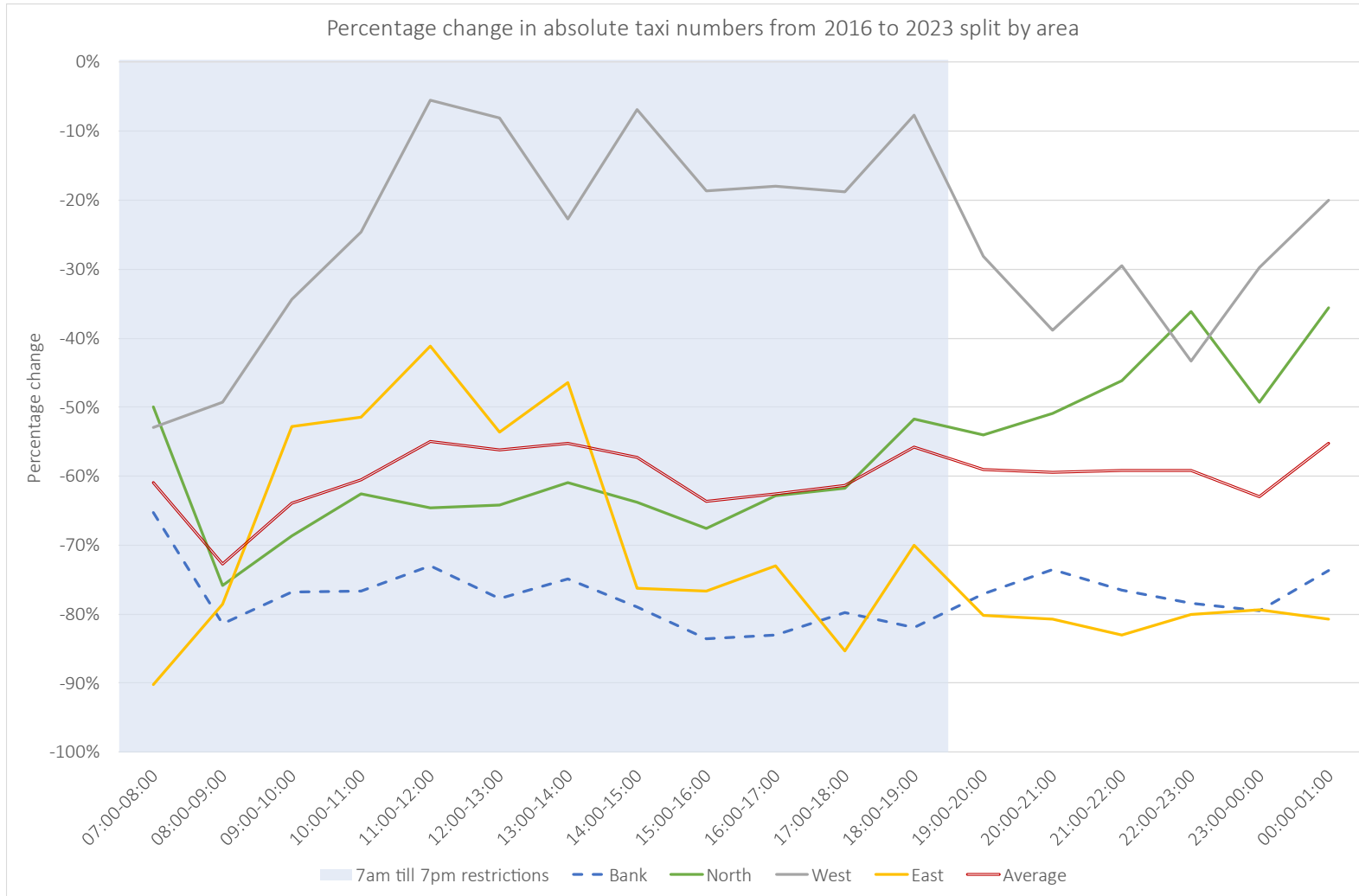


All areas showed a drop in absolute taxi numbers when comparing data from 2016 to 2023 (Figure 3-23). Figure 3-24 (page 58) shows that Bank area has a greater than average percentage decrease in taxis across the whole survey period. Both the East and North sites also showed a larger decrease in taxis than the average of all sites. In the East, the taxi numbers decreased more than average before 09:00 and after 14:00. The North was between 09:00 and 17:00. This decrease is also likely in part due to a wider 30% decrease in licensed taxis in London between the years, as discussed in Section 4.

**Figure 3-23 - Absolute taxi count comparison between 2016 and 2023 split by area**



**Figure 3-24 - Percentage change in absolute taxi numbers from 2016 to 2023 split by area**

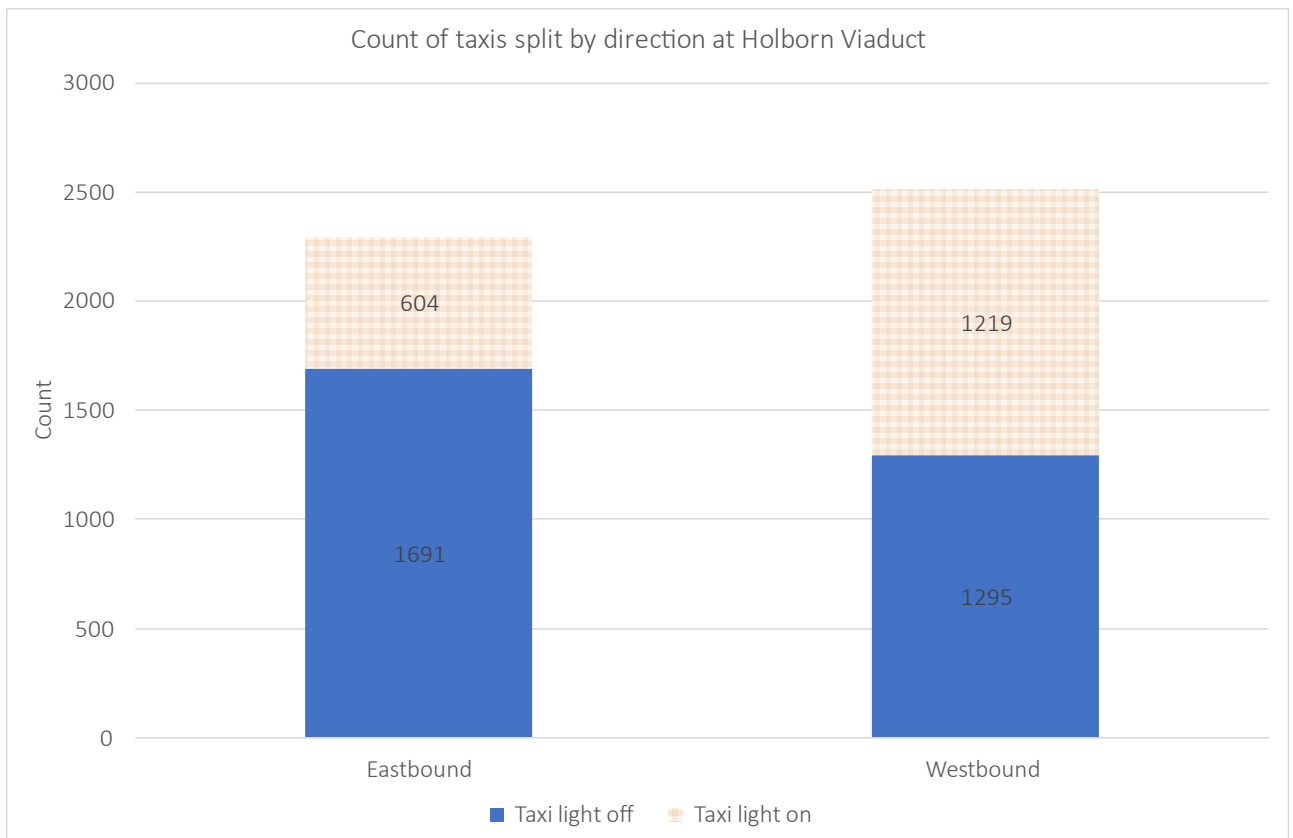




Further analysis was undertaken to look at the count of taxis at Holborn Viaduct. This was looked at by direction to see how availability changed in and out of the city and Bank area.

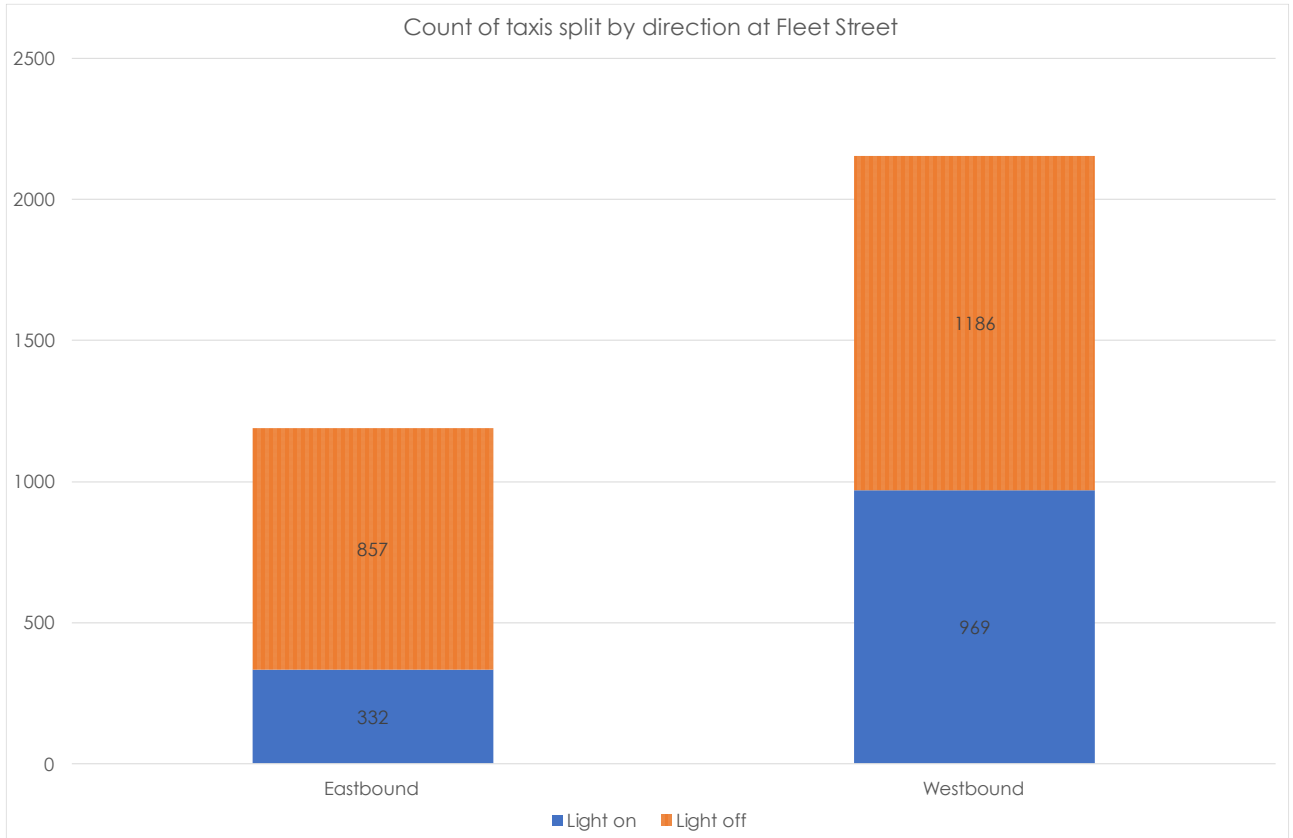
Figure 3-25 shows that overall less taxis were recorded travelling eastbound into the Bank area than were recorded westbound coming out of the Bank area. Eastbound a higher proportion of taxis had their light off, showing busy or unavailable, than had their light on. Of those taxis travelling westbound out of the Bank area, almost 50% had their light on showing availability.

**Figure 3-25 - Count of taxis split by direction at Holborn Viaduct**



At Fleet Street, almost half the number of taxis were recorded going eastbound into the Bank area than were seen coming westbound out of Bank. Both Eastbound and Westbound had a very similar number of taxis with their lights off, but the number of taxis with their light on coming away from Bank area was three times that of coming into the area (Figure 3-26).

**Figure 3-26 - Count of taxis split by direction at Fleet Street**



In general, the Bank area exhibits lower taxi availability, which is to be expected as many of these streets are no longer through routes by car or taxi during the day. Additional data is required to assess how this compares to other local access streets that are not through routes to destinations. The numbers remain relatively stable outside of the 7 AM to 7 PM restrictions, indicating that the problem may not solely stem from the ability to pass through Bank.

### 3.5 JOURNEY TIME SURVEY

This section looks at four location pairs and the time it took to drive between them. The origin destination pairs were:

- 1- Southwark Street to Silk Street (via London Bridge);
- 2- Whitechapel High Street to Blackfriars Station;
- 3- Fenchurch Street Station to Giltspur Street; and
- 4- Liverpool Street to Queen Street.

All origin destination pairs were allocated at least two routes for journey time surveying, with two pairs given a third route via Bishopsgate for additional data collection.

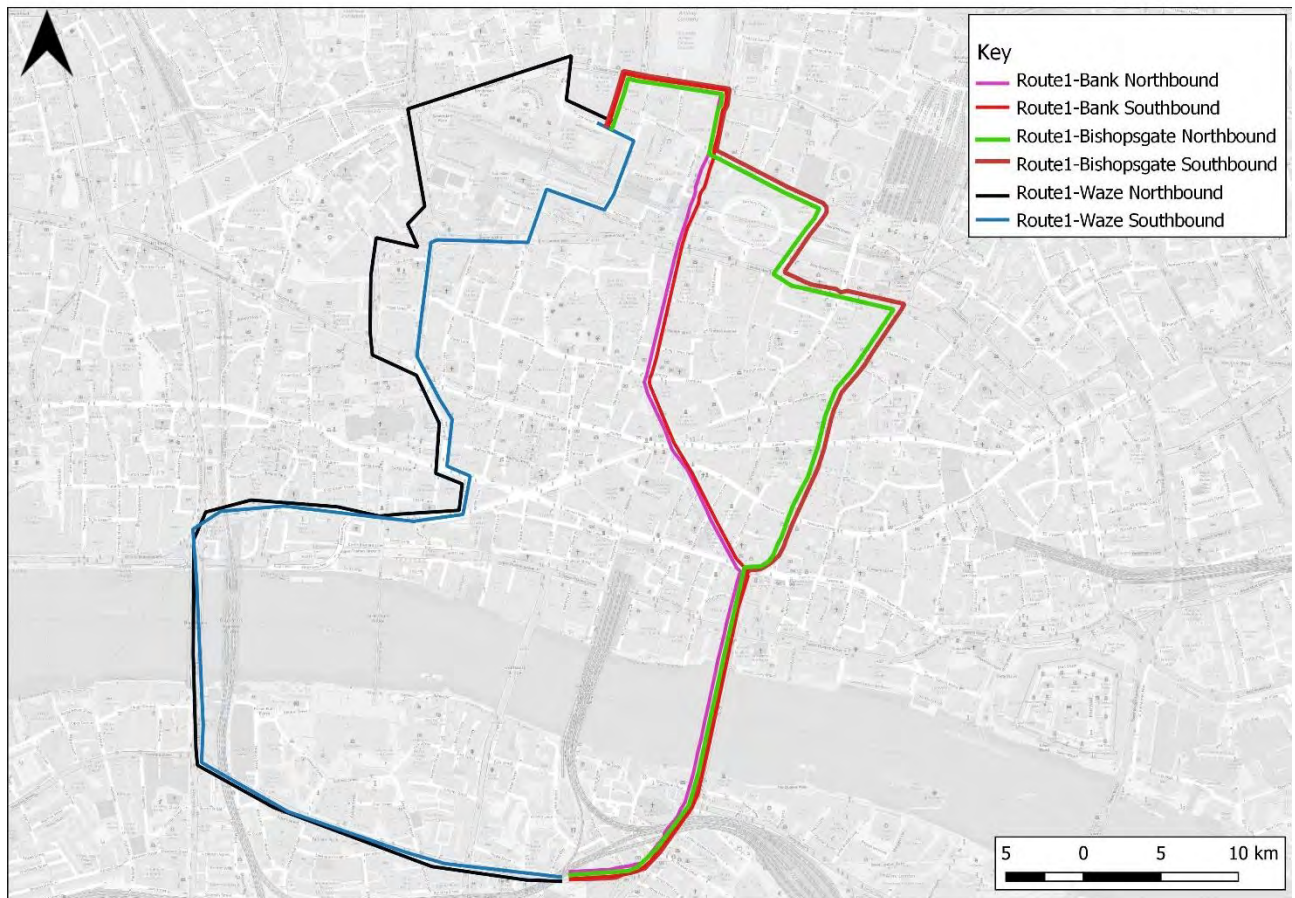
These route options were:

- 1- Take the vehicle through Bank Junction;
- 2- To be taken along Bishopsgate; and
- 3- Take the vehicle along the fastest route that observes all relevant traffic restrictions in place between 7am and 7pm using the Waze app.

At the time of the survey being completed Bank junction had temporary lights operating. These had the potential to add up to 2 minutes onto a journey time run. For the purpose of the study, vehicles were allowed to pass through Bank restrictions for the Bank route, and Bishopsgate for that route. All other restrictions were observed, such as Cheapside Bus Gate between Bread Street and Bow Lane. This restriction has since been removed. A breakdown of each run time can be found in Appendix D.

'Origin-destination pair' one was Southwark Street to Silk Street (via London Bridge).

**Figure 3-27 - Origin destination pair one:Southwark Street to Silk Street (via London Bridge)**



The journey time surveys demonstrated a mean travel time of 15 minutes 51 seconds across all route options. The quickest route Northbound was through Bank at 14 minutes 54 seconds. The slowest was the route chosen via Waze at 20 minutes and 26 seconds. The Waze route appears to be the longest which can be explained as London Bridge has restrictions on allowing only buses, motorcycles, and taxis. The driver performing the journey time survey was unable to drive across London Bridge and therefore had to take a longer route. Due to this, it appears that opening up Bank restrictions to allow taxis would decrease the journey time for Northbound journeys, however this is one of only two routes pairs out of 8.

The quickest route Southbound was Waze at 13 minutes and 36 seconds, and the slowest route was via Bank at 16 minutes and 29 seconds (Figure 3-28). Opening up Bank junction to taxis would not result in a reduction to journey times.

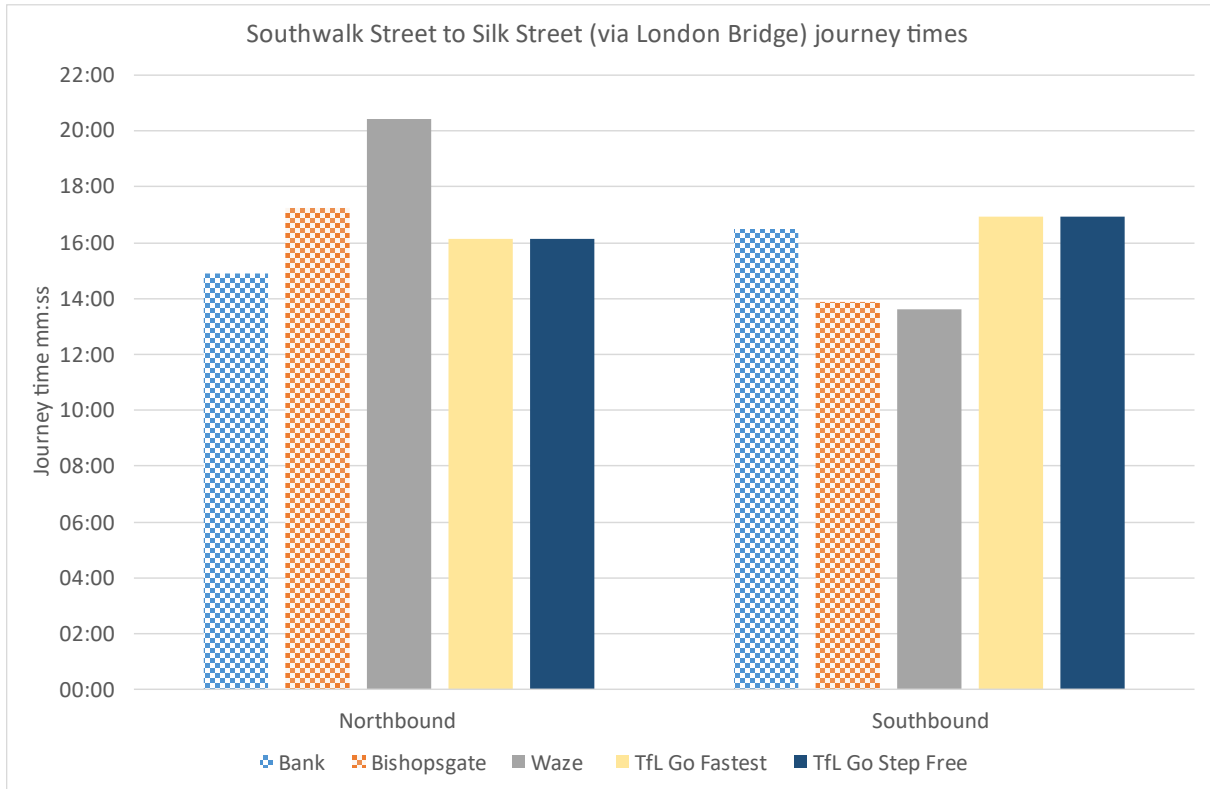
TfL Go was used to find the comparable journey via public transport looking at the fastest option and step free. Both options Northbound were over 16 minutes on average, and Southbound nearly 17 minutes making this option one of the slowest compared to driving through Bank or Bishopsgate. All route options in both directions were within 5 minutes of



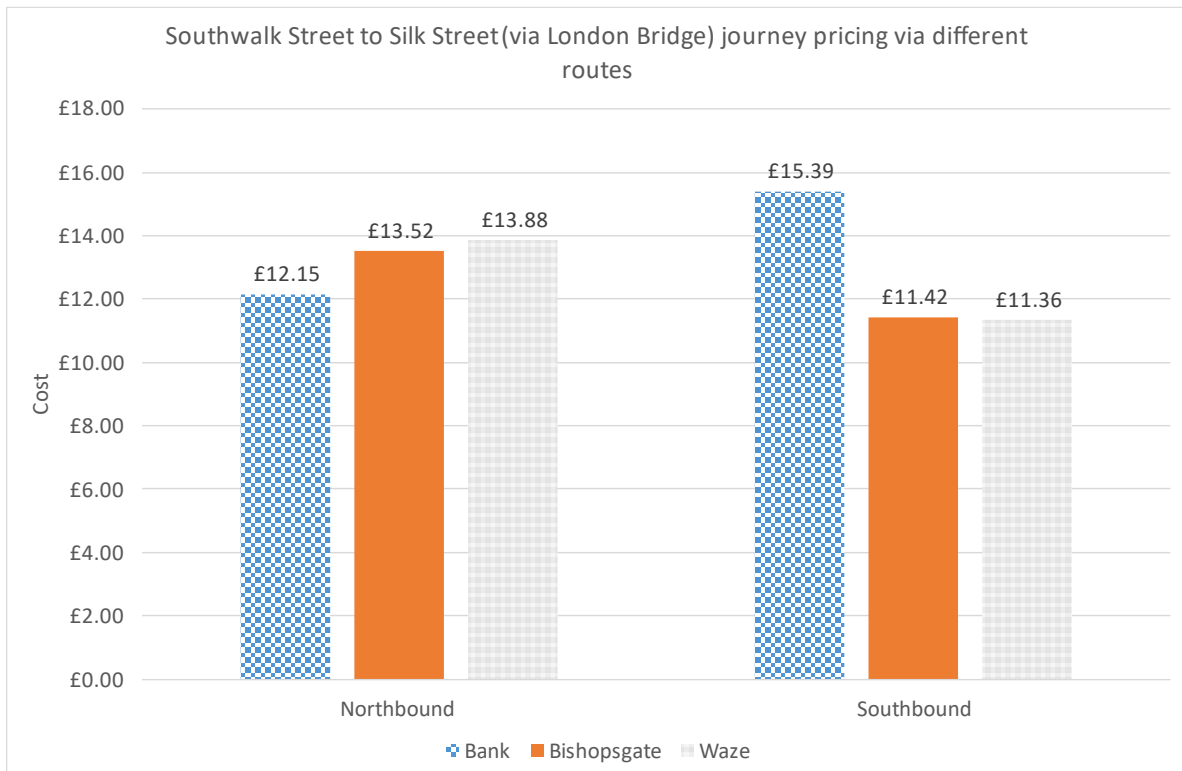
each other, showing that driving through Bank junction would not make a significant difference.

The cost of taxis via different routes ranged from approximately £12.00 to £14.00 Northbound, with the cheapest being via Bank at £12.15 and Waze the most expensive at £13.88. Southbound, Waze and Bishopsgate were both approximately £11.40, but Bank route cost £15.39 (Figure 3-29).

**Figure 3-28 - Southwark Street to Silk Street journey times**

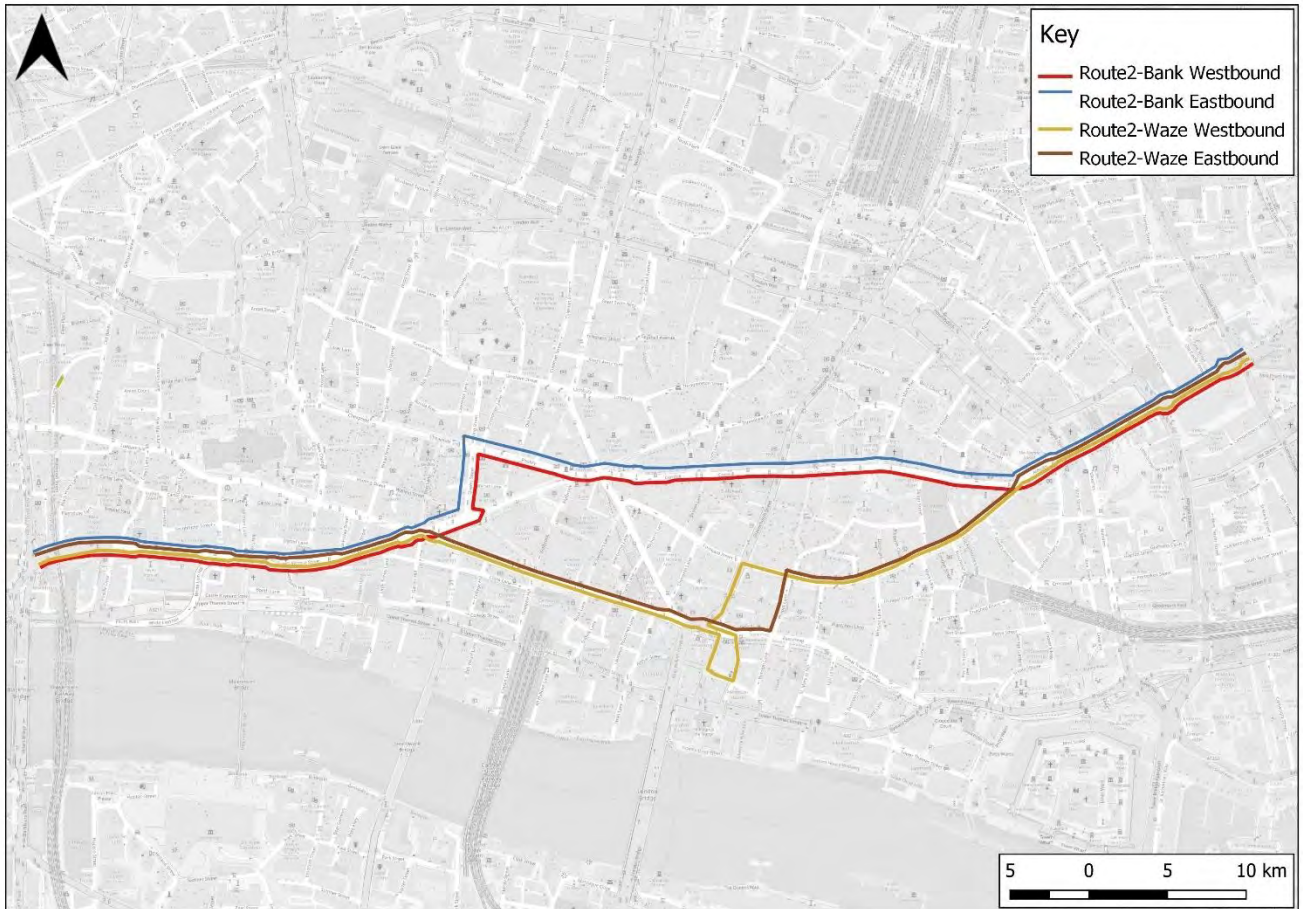


**Figure 3-29 - Southwark Street to Silk Street journey pricing via different routes**



'Origin-destination pair' two route was from Whitechapel High Street to Blackfriars Station.

**Figure 3-30 - Whitechapel High Street to Blackfriars Station**

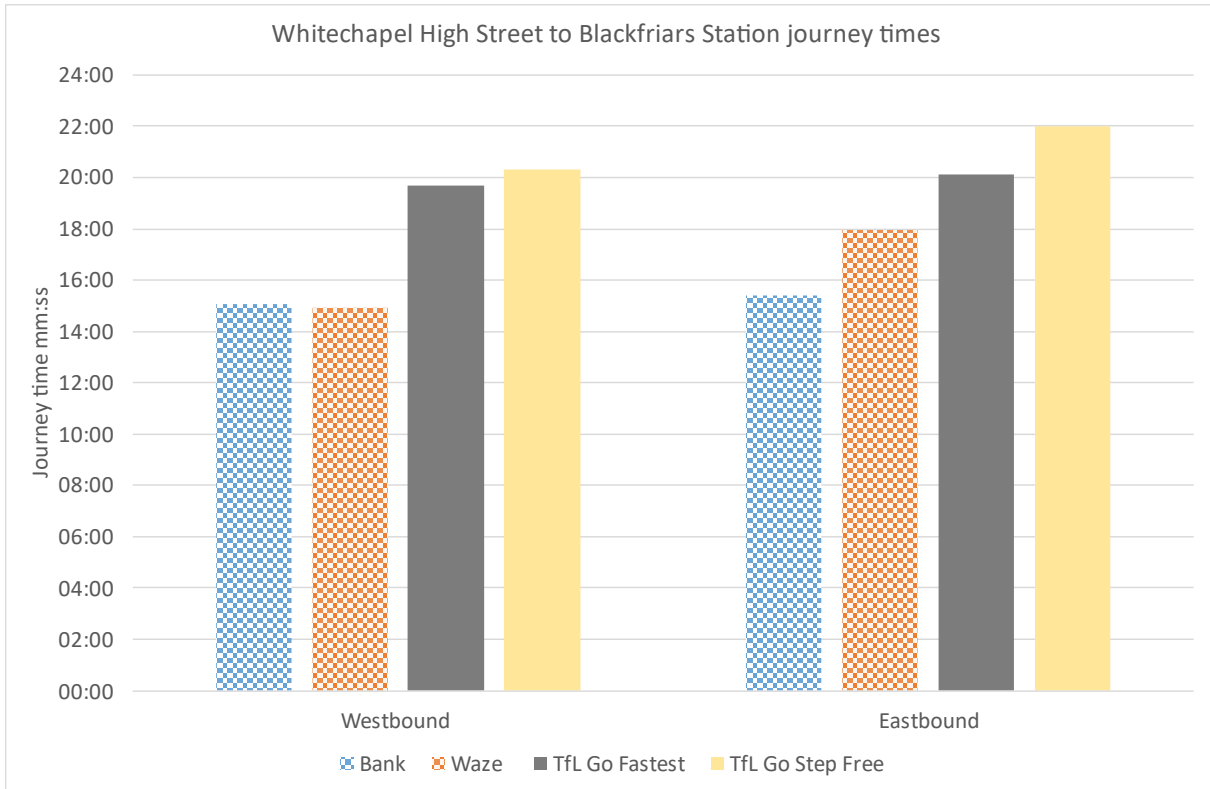


Overall, this journey had an average completion time of 15 minutes and 59 seconds. Travelling Westbound both route options took almost 15 minutes and travelling through Bank did not reduce the journey time. However, traveling Eastbound the route times varied with the route through Bank taking 15 minutes and 24 seconds and Waze taking almost 18 minutes (Figure 3-31).

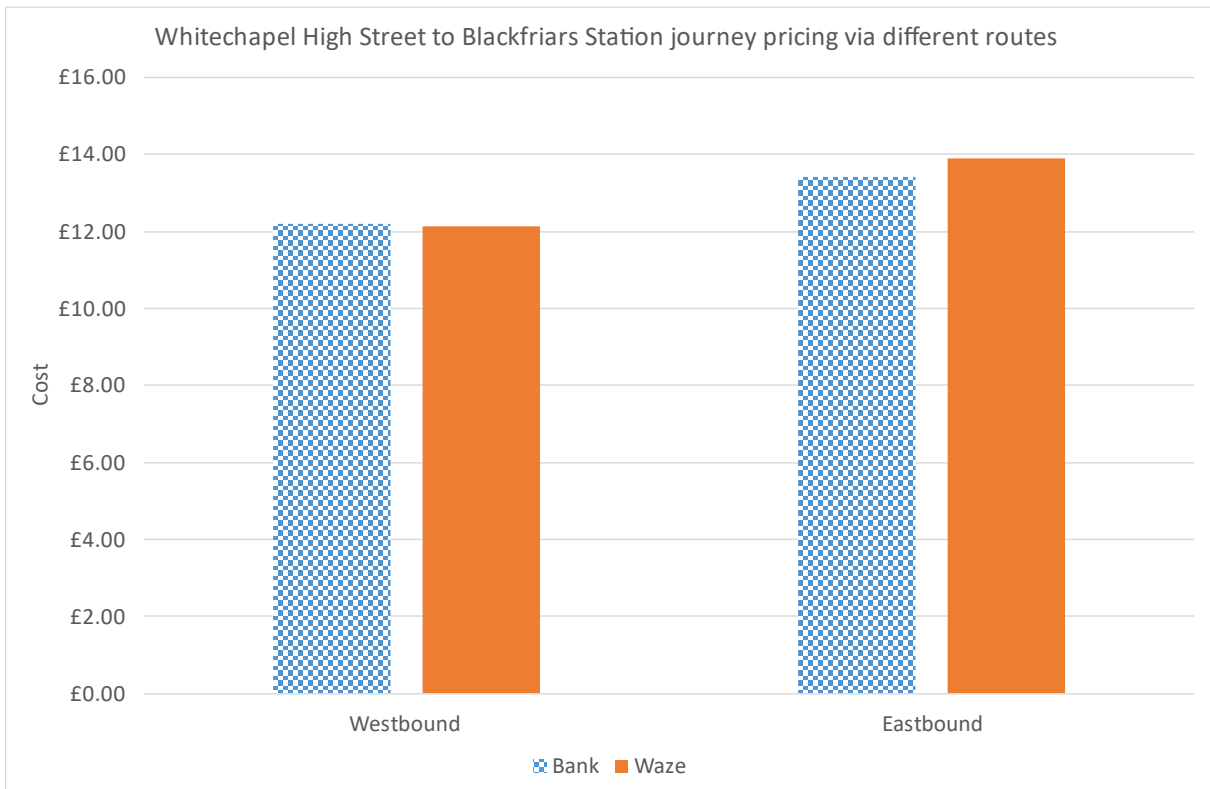
TfL Go routes in both Westbound and Northbound directions were estimated to take 20 minutes Westbound and 20 minutes Northbound (22 minutes for step free options). Driving routes took less time than public transport despite the restrictions at Bank and Bishopsgate restrictions.

Westbound taxi prices were both approximately £12.20, however Eastbound was slightly more expensive with Bank costing £13.42 and Waze £13.90 (Figure 3-32).

**Figure 3-31 - Whitechapel High Street to Blackfriars Station journey times**



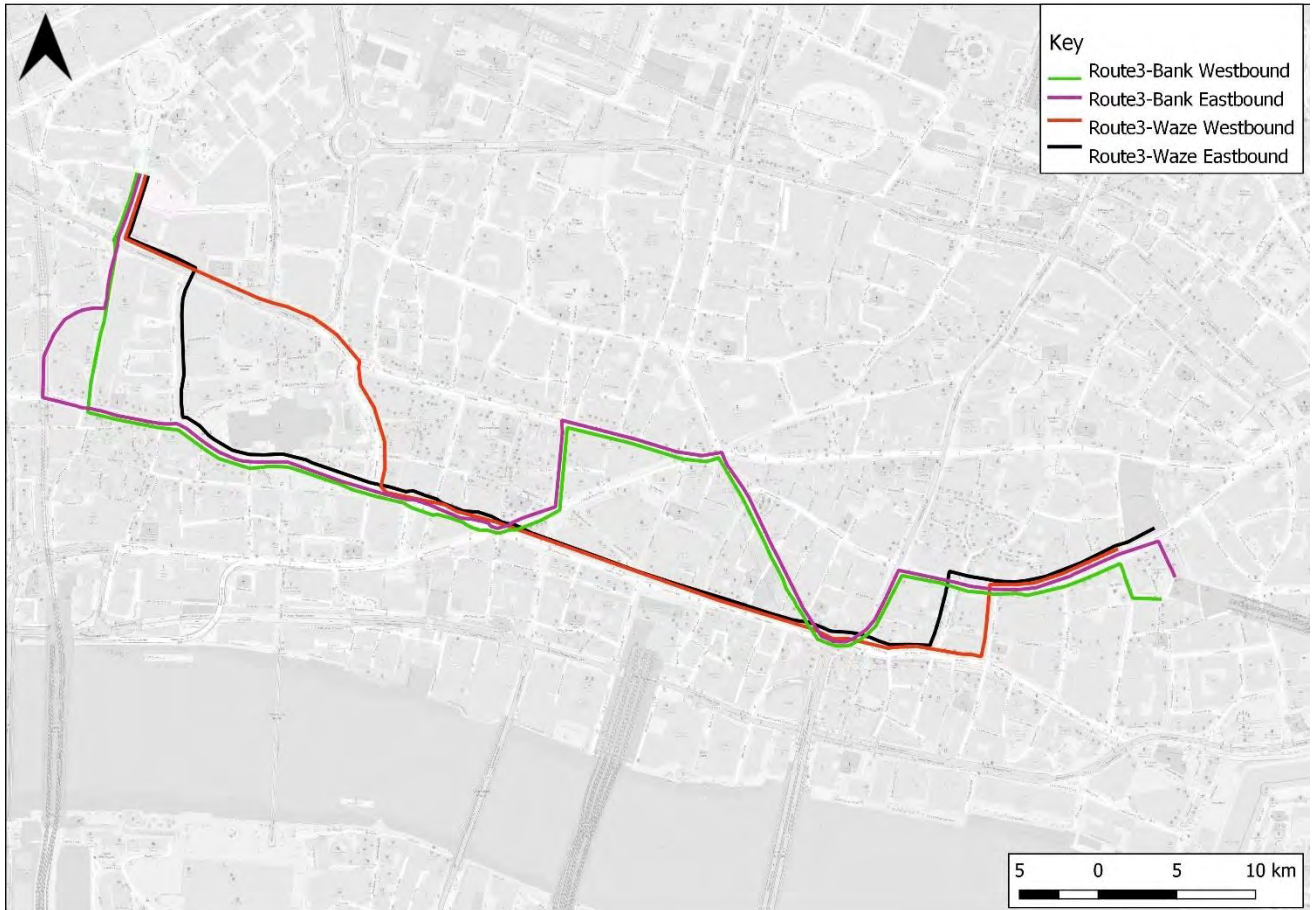
**Figure 3-32 - Whitechapel High Street to Blackfriars Station journey pricing via different routes**





'Origin-destination pair three between Fenchurch Street Station and Giltspur Street showed a longer journey time Eastbound than Westbound.

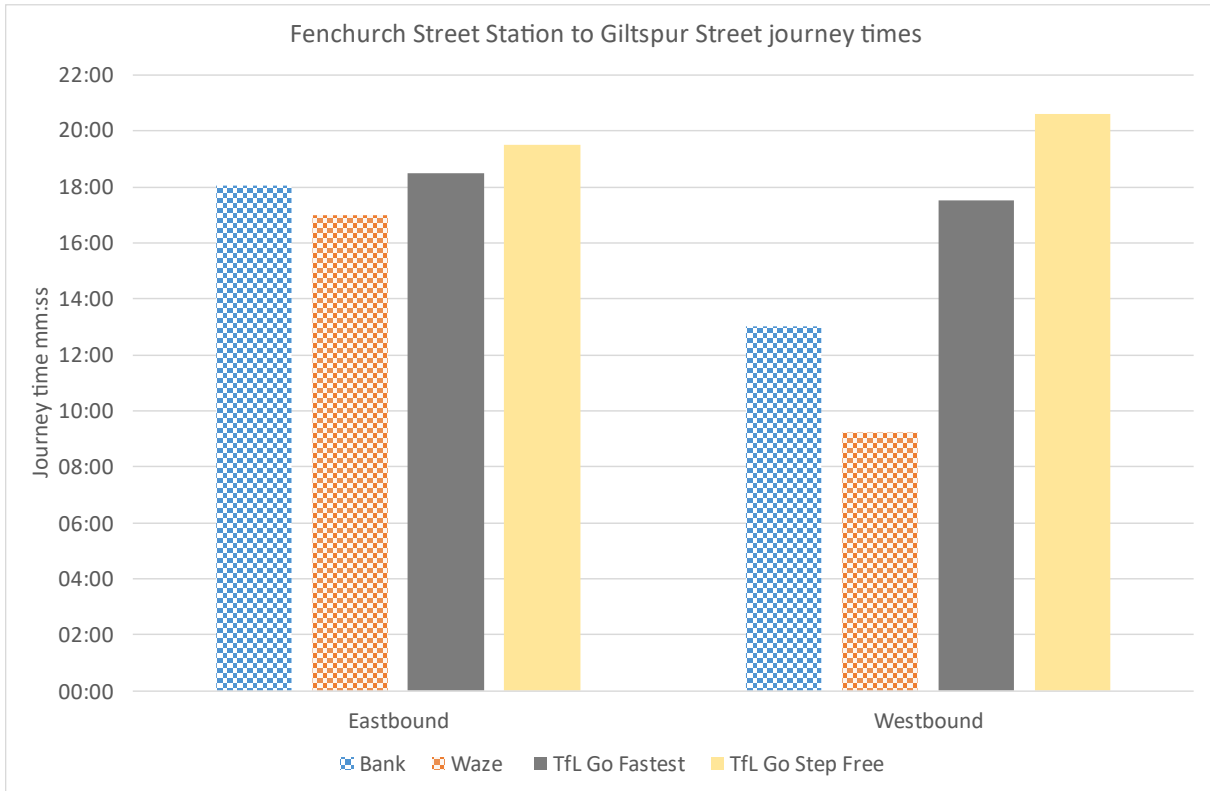
**Figure 3-33 - Fenchurch Street Station and Giltspur Street**



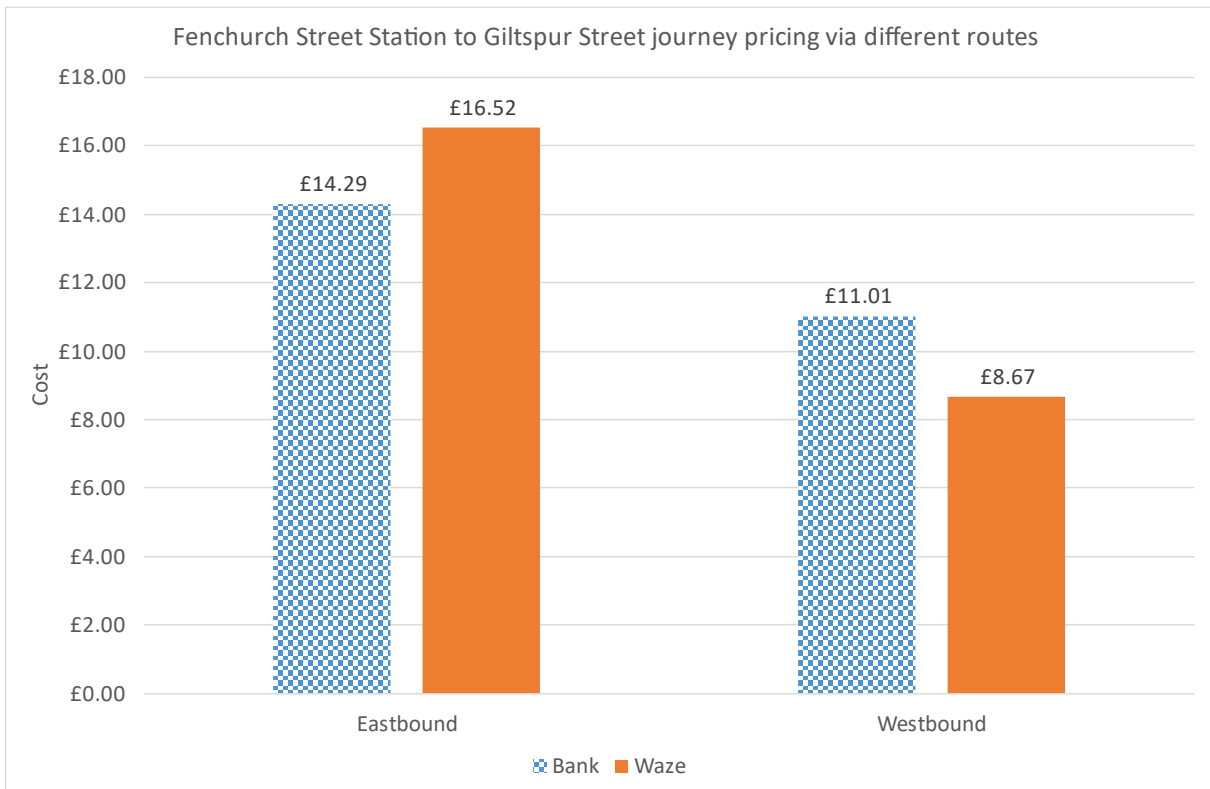
In both directions the route through Bank took longer than the route given by Waze indicating that opening up Bank junction would not result in a reduction in journey times for East to West journeys. Eastbound the route took approximately 18 minutes via Bank but 17 minutes via Waze. Westbound, it took 13 minutes via Bank but over 9 minutes via Waze. Despite this, the Bank route was cheaper Eastbound, costing around £14.30, while Waze route cost around £16.50. Westbound Bank route worked out as £11 while Waze route cost £8.67 on average.

The TfL go app showed a route that was marginally longer for the Eastbound route, at 18 minutes and 30 seconds for the fastest route, or 19 minutes 30 seconds for the step free route. The greatest time difference between a driving option and TfL option was only around 2 minutes and 30 seconds. Westbound showed 17 minutes 30 seconds as the fastest route, and over 20 minutes and 37 seconds for a step free route. This was over a 10-minute difference between a driving option and a TfL option.

**Figure 3-34 - Fenchurch Street Station to Giltspur Street**

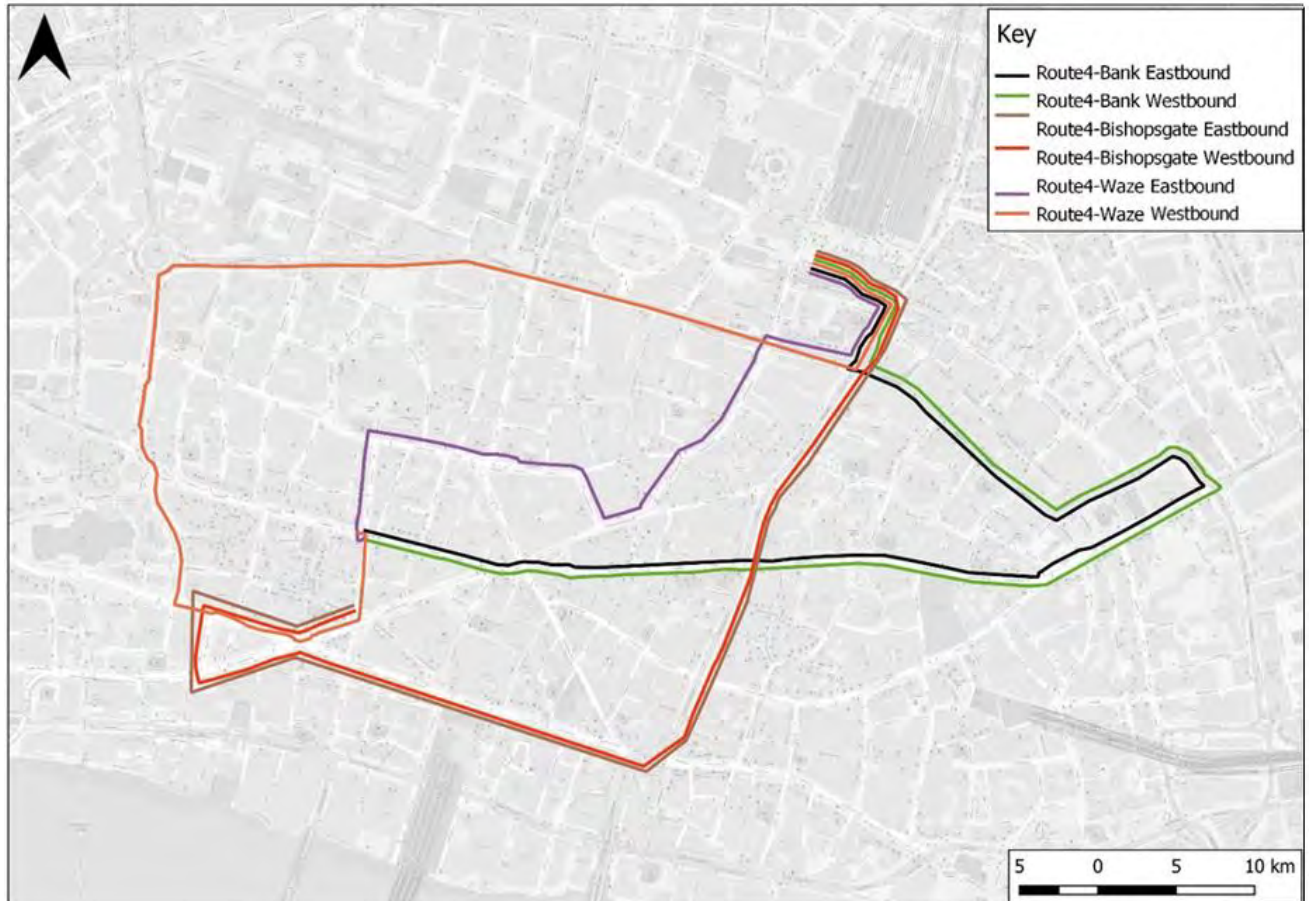


**Figure 3-35 - Fenchurch Street Station to Giltspur Street journey pricing via different routes**



'Origin-destination pair' four was between Liverpool Street to Queen Street. In both directions, the routing via Bank was the slowest and most expensive route option. As seen in Figure 3-36, this could be due to the need to divert via Aldgate to travel via Bank. This was not the most logical method of reaching the destination.

**Figure 3-36 - Liverpool Street to Queen Street**



The averaged journey for this route took around 12 minutes and 13 seconds. The route through Bank took around 14 minutes and 25 seconds in both directions. The Bishopsgate route and Waze route varied by direction. Bishopsgate took almost 11 minutes 40 seconds Westbound and 12 minutes 30 seconds Eastbound. The Waze route took 13 minutes Westbound but less than 9 minutes Eastbound (Figure 3-37). In both directions Waze was quicker than the Bank alternative, although this could have been down to the pre-selected routing of the Bank journey. This indicates that journeys for this general routing would not benefit from the reopening of Bank.

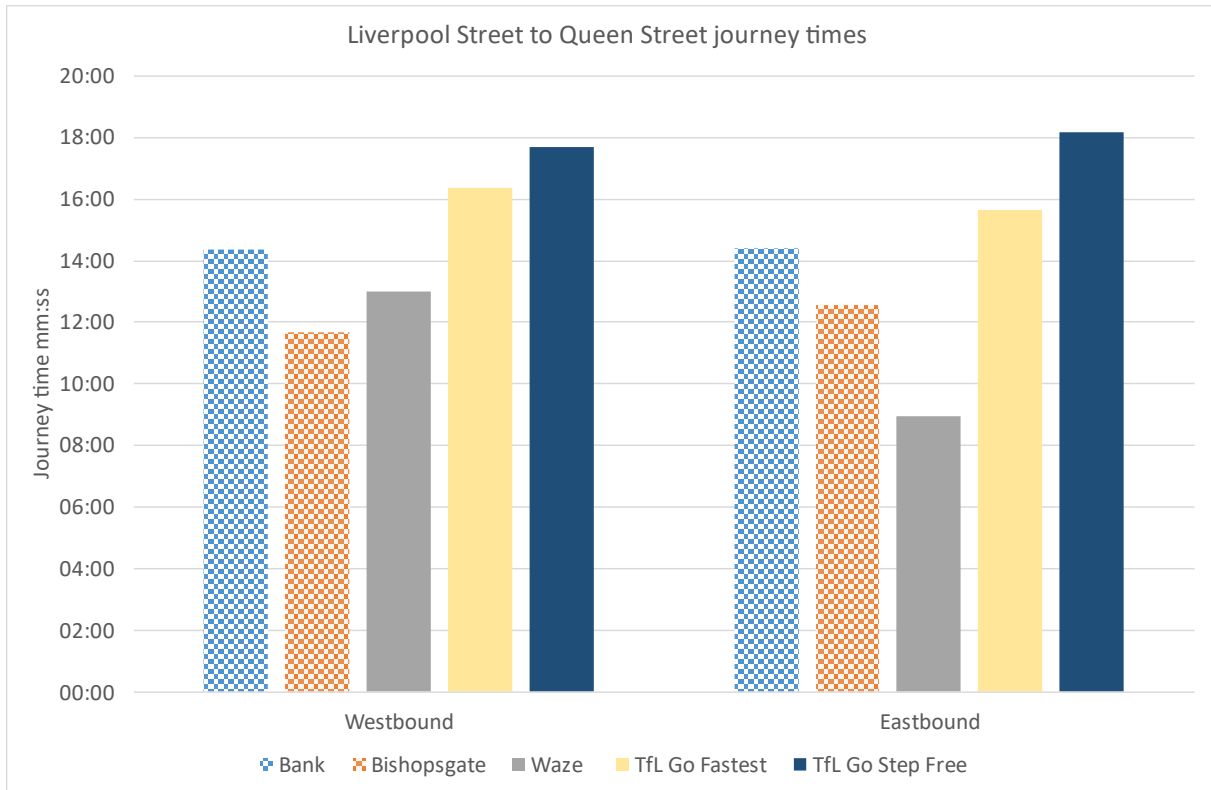
Similarly, to this, both directions through Bank cost approximately £11.85. Eastbound the Bishopsgate route cost £10.22 on average, but £11 on the Waze route. Westbound, the Bishopsgate route cost £10.75 and the Waze route was cheaper at £8.63 (Figure 3-38).

The TfL Go app was the slowest option compared to all driving journeys in both directions. The fastest route was 16 minutes 23 seconds on average, while a step free journey took



almost 18 minutes. Eastbound the quickest journey was over 15 minutes and 30 seconds, where as the step free access route was over 18 minutes.

**Figure 3-37 - Liverpool Street to Queen Street journey times**



**Figure 3-38 - Liverpool Street to Queen Street journey pricing via different routes**

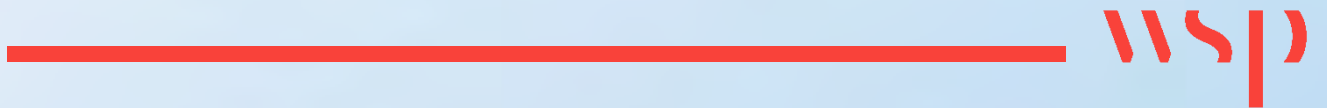




Overall, costs and journey times did not vary much across all four origin destinations pairs, suggesting the Bank restrictions have limited impacts to potential taxi times. Out of eight directional routes, Waze was fastest or of comparable journey time to routes that went through Bank despite adhering to restrictions and not using Bank junction or Bishopsgate. All but one journeys by taxi via any route were quicker than taking public transport. Bank was only the fastest route for Route 1 Northbound and Route 2 Eastbound.

# 3-

## OTHER DATA SOURCES



## 4 OTHER DATA SOURCES

---

### 4.1 NUMBER OF TAXIS DETECTED BY THE CONGESTION CHARGE AND LOW EMISSIONS ZONE

The data provided in Appendix F shows the average number of licensed taxis detected during charging hours and on charging days for the years 2016 to 2023.

In 2016, the average number of licensed taxis detected during charging hours was 11,396. In 2017, there was a slight increase to 11,409 but from 2018 onwards, there is a clear declining trend:

- 2018: 9,796;
- 2019: 9,405; and
- 2021: 5,310.

There is a missing data point for the year 2020, due to the onset of COVID-19 and subsequent lockdowns. The declining trend continues in the subsequent years:

- 2022: 6,585; and
- 2023: 6,344.

The overall pattern shows a definite decrease in the average number of licensed taxis detected during charging hours and on charging days over the specified years. There might be various factors contributing to this decline, such as changes in transport trends, shifts in consumer or driver preferences to ride hailing apps, or changes in the taxi industry itself. Further analysis and contextual information would be necessary to provide a more detailed explanation for the observed pattern.

### 4.2 SHOWS TAXI AND PRIVATE HIRE LICENSING FIGURES

Appendix G shows taxi and private hire licensing figures by year from 2009/10 to January 2024.

#### Taxi

From 2009/10 to 2015/16, there is a general upward trend in the number of licenses:

- 2009/10: 21,334; and
- 2015/16: 21,500.

However, starting from 2016/17, there is a noticeable decline in the number of licenses:

- 2016/17: 21,274;
- 2017/18: 20,803;
- 2018/19: 20,301;
- 2019/20: 19,642;



- 2020/21: 18,341; and
- 2021/22: 17,361.

The most recent data point in January 2024 shows a further decrease to 15,795.

The overall pattern indicates a steady increase in the number of licenses until around 2015/16, followed by a consistent decline in the subsequent years. The reasons for this decline could be influenced by various factors such as changes in demand for taxi services, regulatory changes, economic conditions, or shifts in transport preferences.

It's also worth noting the significant drop in licenses from 2019/20 to 2020/21 and the continuing decline into January 2024, suggesting a potential acceleration in the rate of decline in recent years.

Whilst the number of licenses black cabs are decreasing, the number of PHV is increasing.

### **Private Hire Vehicle Patterns**

The number of private hire vehicle licenses for the years 2009/10 to January 2024 shows there is a general increasing trend from 2009/10 to 2014/15:

- 2009/10: 59,191; and
- 2014/15: 78,690.

The most significant increase occurs between 2014/15 and 2015/16, where the number of licenses jumps from 78,690 to 101,434. The trend continues to rise in the subsequent years.

Between 2019/20 to 2020/21 there is a decrease in the number of licenses from 111,766 to 105,329. The decline in licenses continues in 2021/22, and the most recent data point in January 2024 shows a further decrease:

- 2021/22: 99,937; and
- Jan 2024: 106,431.

Overall, the data reflects a period of growth in private hire vehicle licenses until around 2019/20, followed by a decline in the subsequent years. The subsequent decline may be influenced by factors such as changing work patterns, economic conditions, or shifts in consumer preferences. To gain a deeper understanding of the patterns observed, additional context and information about the local transport industry and policy decisions during this period would be helpful.

# Appendix A

TAXI RANK NUMBER, LOCATION  
AND COMMENTS



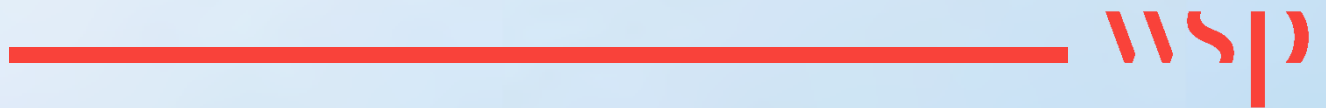
Site Number	Taxi Rank Number	Location	Comments
1	01-TR	Lindsey Street (east of Smithfield Market)	No Issues To Report
2	02-TR	Silk Street (adj Linklaters)	No Issues To Report
3	03-TR	Sun Street	Taxi Rank Not Surveyed Due To Roadworks From Building Site
4	04-TR	Appold Street	No Issues To Report
5	5&6-TR	Liverpool Street (East)	No Issues To Report
6	07-TR	Devonshire Square	No Issues To Report
7	08-TR	St Mary Axe	No Issues To Report
8	09-TR	Leadenhall Street	Taxi Rank Closed Off From 08:09 Until End of Survey
9	10-TR	Philpot Lane	No Issues To Report
10	11-TR	Mincing Lane	No Issues To Report
11	14-TR	Fenchurch Place /Fenchurch St	No Issues To Report
12	13-TR	Fenchurch Place /St Katherines Row	No Issues To Report
13	15-TR	Coopers Row	No Issues To Report
14 -	16-TR	Minories	No Issues To Report
15	17-TR	Lower Thames Street	No Issues To Report
16	18-TR	Cornhill	No Issues To Report
17	19-TR	Queen Victoria Street	Taxi Rank Not Surveyed As Road Was Closed
18	20-TR	Queen Victoria Street (Bloomberg)	No Issues To Report
19	21-TR	Princes Street	No Issues To Report
20	22-TR	Gresham Street (west junc with Old Jewry)	Approximately Half of Taxi Rank Closed Off By Cones With Digger Parked In Taxi Rank
21	23-TR	Gresham Street (west Milk Street)	No Issues To Report



Site Number	Taxi Rank Number	Location	Comments
22	24-TR	Cheapside ( One New Change)	No Issues To Report
23	25-TR	St. Paul's Churchyard	No Issues To Report
24	26-TR	Queen Victoria Street (Church of Scientology)	No Issues To Report
25	27-TR	Queen Victoria Street (Blackfriars Station)	No Issues To Report
26	28-TR	John Carpenter Street	Taxi Rank Surveyed From 00:00 -10:22 Only Due To Camera Malfunction
27	29-TR	Tudor Street	No Issues To Report
28	30-TR	Limeburner Lane	No Issues To Report
29	31-TR	Farringdon Street (opp Goldman Sachs)	No Issues To Report
30	32-TR	St Bride Street	Taxi Rank Not Surveyed As Road Was Closed
31	33-TR	Little New Street	No Issues To Report
32	34-TR	Farringdon Street (Old Fleet Lane)	No Issues To Report
33	35-TR	Wood Street	No Issues To Report
34	36-TR	Crosswall	No Issues To Report

# Appendix B

TAXI RANK OPERATIONAL HOURS





### City of London taxi ranks

Taxi ranks in the City of London are shown below. These are normally appointed by the city of London Police and are correct as of October 2022.

Location	Spaces	Times of operation
Appold Street	6	24 hours
Cheapside	3	24 hours
Cooper Row	2	24 hours
Cornhill	4	24 hours
Crosswall	2	24 hours
Devonshire Square	2	24 hours
Farringdon Street	2	10:00 – 16:00 & 19:00 – 00:00
Farringdon Street	3	24 hours
Farringdon Street	3	24 hours
Giltspur Street	2	24 hours -
Gresham Street (North side)	2	24 hours
Gresham Street (South side)	2	19:00 – 07:00

Location	Spaces	Times of operation
John Carpenter Street	2	24 hours
Leadenhall Street	2	19:00 – 07:00
Limeburner Lane	3	19:00 – 07:00
Lindsay Street (Farringdon Est)	3	24 hours
Little New Street	3	24 hours
Liverpool Street	14	24 hours
Lower Thames Street	9	24 hours
Mincing Lane	4	10:00 – 06:00
Minories	3	24 hours
Muscovy Street	2	24 hours
New Change	2	19:00 – 07:00
Pepys Street	2	24 hours on hotel forecourt
Philpot Lane	4	24 hours
Princes Street	3	07:00 – 19:00
Queen Victoria Street	2	07:00 – 19:00

Location	Spaces	Times of operation
Queen Victoria Street	5	21:00 – 02:00
Queen Victoria Street (City Corporation rest bay)	3	24 hours
Queen Victoria Street	7	24 hours
Queen Victoria Street	4	24 hours
Silk Street	2	24 hours
St Mary Axe	2	24 hours
St Bride Street	8	24 hours
St Paul's Churchyard	2	24 hours
Sun Street	4	24 hours
Tudor Street	3	24 hours
Wood Street	2	24 hours

Source: [TfL appointed taxi ranks - 14 Oct 2022](#) V13 Correct as of 14/10/2022.



# Appendix C

RIDE HAILING APP DATA  
COLLECTION DATES





**17th October:**

1. Cheapside.
2. Moorgate.
6. Gresham Street.
7. Gracechurch Street/Fenchurch Street.

**18th October: On this day, a high security event took place at Mansion House**

12. King William Street.
13. Cornhill.
14. Threadneedle Street.
15. Princes Street.
16. Poultry.
17. Queen Victoria Street.

**19th October:**

3. Bishopsgate.
4. Holborn viaduct.
5. Aldersgate Street.
8. Fleet Street.
9. Farringdon Street/New Bridge Street.
10. Beech Street/Silk Street.
11. London Wall – Wood Street.
18. Leadenhall (East of St Mary Axe).
19. Minories.
20. Chancery Lane.

# Appendix D

JOURNEY TIME COLLECTION DATA





## Journey Time

Southwark Street to Silk Street (via London Bridge)							
Northbound	Run 1	Run 2	Run 3	Run 4	Run 5		
Waze	20:58	18:38	21:41				
Bank	15:30	15:21	12:53	17:52	12:54		
Bishopsgate	17:06	19:11	19:40	14:41	15:29		
Southbound	Run 1	Run 2	Run 3	Run 4	Run 5		
Waze	0:15:59	0:12:56	0:14:02	0:11:25			
Bank	19:45	13:27	18:40	13:13	17:22		
Bishopsgate	09:56	12:29	14:31	17:19	15:03		
Whitechapel High Street to Blackfriars Station							
Westbound	Run 1	Run 2	Run 3	Run 4			
Bank	15:19	14:47					
Waze	17:43	15:24	15:45	10:53			
Eastbound	Run 1	Run 2	Run 3	Run 4			
Bank	16:32	16:12	13:28				
Waze	18:51	13:46	20:29	18:39			
Fenchurch Street Station to Giltspur Street							
Eastbound	Run 1	Run 2	Run 3	Run 4			
Bank	21:02	11:18	20:36	19:15			
Waze	14:32	15:37	14:09	23:34			
Westbound	Run 1	Run 2	Run 3	Run 4			
Bank	13:36	12:03	12:26	13:59			
Waze	09:24	09:55	07:02	10:31			

Liverpool Street to Queen Street							
Westbound	Run 1	Run 2	Run 3	Run 4	Run 5		
Bishopsgate	09:06	12:55	12:26	12:11			
Bank	12:11	14:34	17:42	13:04			
Waze	10:58	16:06	13:12	13:49	10:56		
Eastbound	Run 1	Run 2	Run 3	Run 4	Run 5	Run 6	Run 7
Bishopsgate	11:36	13:03	08:25	13:56	15:46		
Bank	12:30	19:52	13:18	13:27	12:58		
Waze	10:08	06:52	08:30	07:46	13:12	08:32	07:30



**TFL GO FASTEST**

Run	Route 1		Route 2		Route 3		Route 4	
	Northbound	Southbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound
1	00:16:00	00:17:00	00:18:00	00:21:00	00:18:00	00:22:00	00:16:00	00:14:00
2	00:18:00	00:17:00	00:21:00	00:23:00	00:18:00	00:17:00	00:16:00	00:14:00
3	00:17:00	00:17:00	00:18:00	00:19:00	00:17:00	00:19:00	00:19:00	00:14:00
4	00:16:00	00:17:00	00:19:00	00:19:00	00:18:00	00:18:00	00:17:00	00:14:00
5	00:16:00	00:17:00	00:20:00	00:19:00	00:18:00	00:18:00	00:14:00	00:14:00
6	00:19:00	00:17:00	00:22:00	00:21:00	00:15:00	00:18:00	00:17:00	00:14:00
7	00:17:00	00:16:00		00:19:00	00:18:00	00:18:00	00:17:00	00:14:00
8	00:17:00	00:17:00			00:18:00	00:18:00	00:14:00	00:14:00
9	00:17:00	00:17:00					00:14:00	00:14:00
10	00:17:00	00:17:00					00:18:00	00:24:00
11	00:12:00	00:17:00					00:17:00	00:16:00
12	00:10:00	00:17:00					00:17:00	00:18:00
13	00:18:00	00:17:00					00:17:00	00:16:00
14		00:17:00						00:18:00



Run	Route 1		Route 2		Route 3		Route 4	
	Northbound	Southbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound
								00:17:00
								00:14:00
								00:17:00

**TFL GO STEP FREE**

Run	Route 1		Route 2		Route 3		Route 4	
	Northbound	Southbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound
1	00:16:00	00:17:00	00:18:00	00:23:00	00:24:00	00:24:00	00:16:00	00:14:00
2	00:18:00	00:17:00	00:21:00	00:23:00	00:18:00	00:17:00	00:16:00	00:22:00
3	00:17:00	00:17:00	00:21:00	00:22:00	00:19:00	00:19:00	00:19:00	00:20:00
4	00:16:00	00:17:00	00:20:00	00:22:00	00:21:00	00:18:00	00:17:00	00:22:00
5	00:16:00	00:17:00	00:20:00	00:22:00	00:22:00	00:24:00	00:14:00	00:14:00
6	00:19:00	00:17:00	00:22:00	00:23:00	00:15:00	00:18:00	00:17:00	00:22:00
7	00:17:00	00:16:00		00:19:00	00:23:00	00:18:00	00:17:00	00:14:00
8	00:17:00	00:17:00			00:23:00	00:18:00	00:14:00	00:14:00
9	00:17:00	00:17:00					00:14:00	00:22:00



Run	Route 1		Route 2		Route 3		Route 4	
	Northbound	Southbound	Westbound	Eastbound	Westbound	Eastbound	Westbound	Eastbound
10	00:17:00	-					00:18:00	00:25:00
11	00:12:00	-					00:17:00	00:16:00
12	00:10:00	00:17:00					00:22:00	00:18:00
13	00:18:00	00:17:00					00:17:00	00:20:00
14		00:17:00						00:20:00
								00:17:00
								00:14:00
								00:15:00



# Appendix E

EXCLUDED RIDE HAILING APP DATA





Five apps were initially chosen to record ride hailing wait times. These were Gett, Uber, Bolt, Free Now and Addison Lee.

### **Taxi**

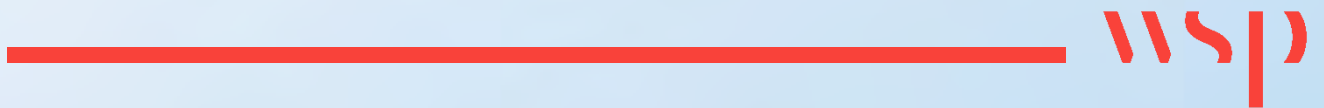
Data from Free now, Addison lee, Bolt has been used for the analysis of taxi waiting times. Gett app data was excluded because of a potential lack of data accuracy and Uber does not have Taxi/Black Cabs on the app yet.

### **Private Hire Vehicles**

Data from Free Now, Uber and Bolt has been used for the analysis of PHV waiting times. Addison Lee data has been omitted from PHV data, as it exhibits no similarities with other app recordings and Gett does not include PHV on their app.

# Appendix F

CONGESTION CHARGE AND LOW  
EMISSIONS ZONE



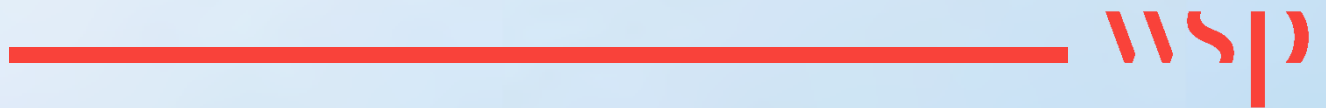
**Congestion Charge and Low Emissions Zone factsheets**

<b>Date</b>	<b>from</b>	<b>to</b>	<b>Average number of Licensed Taxis detected (during charging hours and on charging days)</b>
	01-Apr	30-Jun	
Q1	2016		11396
Q1	2017		11409
Q1	2018		9796
Q1	2019		9405
Q1	2021		5310
Q1	2022		6585
Q1	2023		6344
Q1	2020		n/a

Source: [Congestion Charge - Transport for London \(tfl.gov.uk\)](https://tfl.gov.uk)

# Appendix G

TAXI AND PRIVATE HIRE LICENSING  
FIGURES BY YEAR



<b>Taxis</b>				
<b>Year</b>	<b>Vehicles</b>	<b>Drivers: All London</b>	<b>Drivers: Suburban</b>	<b>Drivers: Total</b>
09/10	22,445	21,334	3,580	24,914
10/11	22,558	21,499	3,571	25,070
11/12	23,099	21,690	3,646	25,336
12/13	22,168	21,733	3,727	25,460
13/14	22,810	21,876	3,662	25,538
14/15	22,500	21,724	3,508	25,232
15/16	21,759	21,500	3,370	24,870
16/17	21,300	21,274	3,213	24,487
17/18	21,026	20,803	3,023	23,826
18/19	20,136	20,301	2,858	23,159
19/20	18,504	19,642	2,695	22,337
20/21	13,461	18,341	2,445	20,786
21/22	14,695	17,361	2,184	19,486
7 January 2024	14,756	15,795	1,854	17,645

<b>Private Hire</b>			
<b>Year</b>	<b>Operators</b>	<b>Drivers</b>	<b>Vehicles</b>
09/10	2,882	59,191	49,355
10/11	3,111	61,200	50,663
11/12	3,164	64,063	53,960
12/13	3,159	66,975	49,854
13/14	3,038	65,656	52,811
14/15	3,006	78,690	62,724
15/16	2,814	101,434	78,139
16/17	2,430	117,712	87,409

<b>Private Hire</b>			
<b>Year</b>	<b>Operators</b>	<b>Drivers</b>	<b>Vehicles</b>
17/18	2,373	113,645	87,921
18/19	2,206	106,777	88,113
19/20	2,113	111,766	94,712
20/21	1,955	105,329	77,726
21/22	1,710	99,937	80,857
7 January 2024	1,717	106,431	91,965

Source TfL: [Licensing information - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/road-users/private-hire-licensing).



WSP House  
70 Chancery Lane  
London  
WC2A 1AF

[wsp.com](http://wsp.com)



# All Change at Bank – April 2024 Equality Impact Assessment (EqIA) Update

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# All Change at Bank – April 2024 Equality Impact Assessment (EqIA) Update

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## **Appendices**

Appendix A: Technical Note: Analysis of Additional Datasets

# 1 Introduction

## Introduction

1.1 This Equality Impact Assessment (EqIA) relates to potential changes to the traffic restrictions at Bank junction. The City of London (CoL) seeks to ensure that any change fully considers accessibility needs and provides an auditable document trail that sets out design considerations and decisions.

1.2 For context, a short summary of this scheme has been provided within this section of the report.

## All Change at Bank scheme

1.3 The All Change at Bank scheme was developed in order to provide more space for people walking and to enhance the public realm. Changes (currently under construction) will simplify the junction to prioritise the space for pedestrians, allowing space for seating and greening:

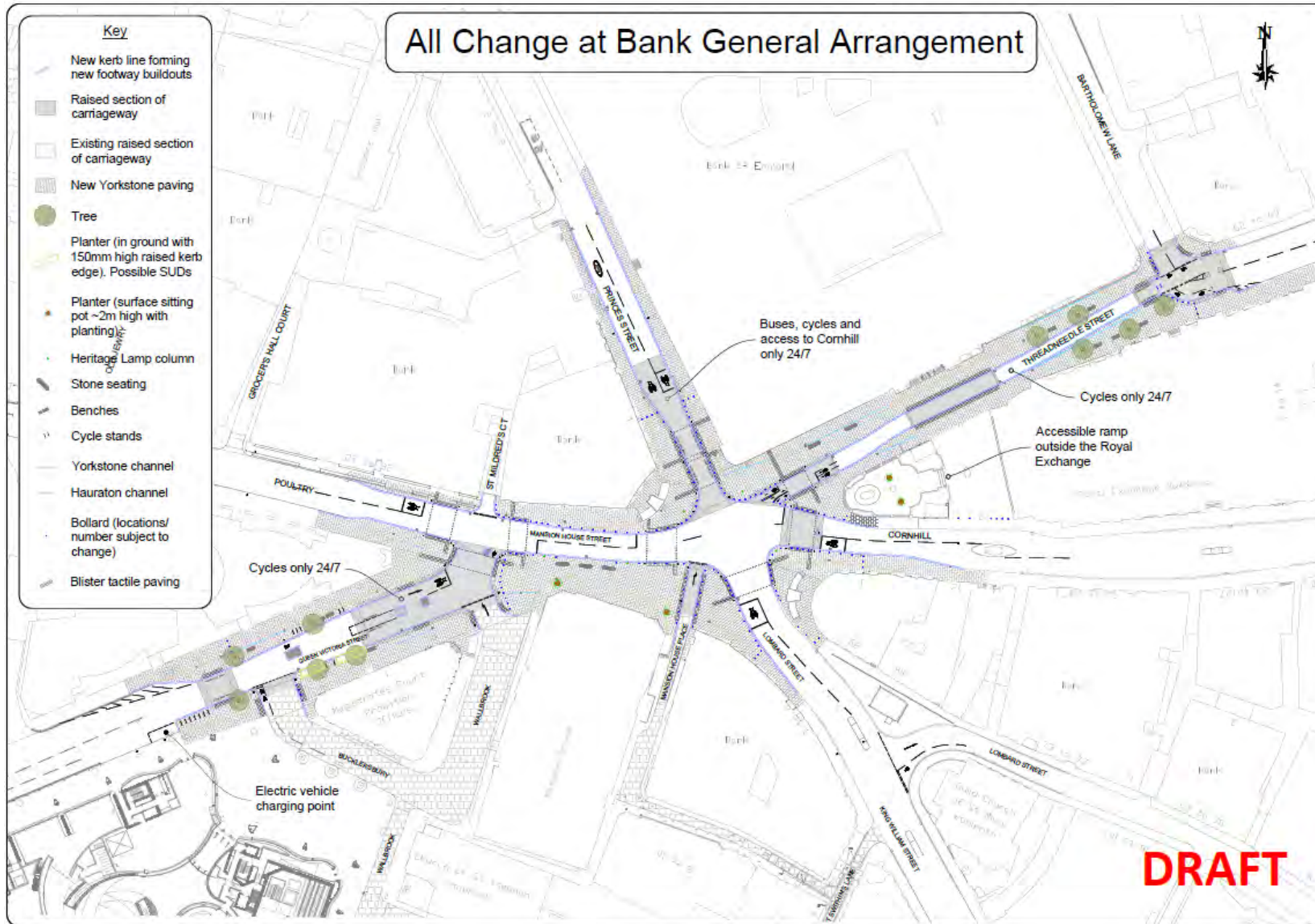
- Parts of Threadneedle Street and Queen Victoria Street will be closed to all motor vehicles 24/7
- Princes Street will see changes that will be in place 24/7
- Only buses and cycles will be able to travel northbound towards Moorgate
- Vehicles needing to access Cornhill will be able to travel southbound and turn left into Cornhill

1.4 The main traffic junction will be made smaller, making it clearer to those driving or cycling as to where they should be positioned on the carriageway. There will be fewer opportunities for turning manoeuvres, reducing the risk of collisions. Narrower carriageways will mean larger footways and more comfort for pedestrians.

1.5 Traffic restrictions of buses and cycles only, Monday-Friday, 7am-7pm across Bank junction and travelling westbound into Cornhill will be retained. The design requires some alterations to bus routes (primarily 8, 11, 26 and 133) – as well as to several stops on each of these routes as buses will no longer have access to Queen Victoria Street and Threadneedle Street. Bus stops have been relocated at the closest alternative location, which does not lead to significant increases in journey times.

1.6 **Figure 1.1** presents the proposed design.

Figure 1.1: All Change at Bank proposed layout (source: City of London)





## Existing EqIA (November 2021)

- 1.7 As the All Change at Bank scheme is aimed at making Bank junction more attractive to people walking and dwelling, as well as safer and less polluted, it is considered that the scheme is likely to impact people’s movement and experience of streets and spaces. Groups that have a significant intersection with movement and space, i.e., those that travel in distinguishably different ways, are most likely to be affected. CoL has already completed a Test of Relevance for the All Change at Bank scheme. This identified the following four protected characteristics for assessment: age, disability, pregnancy and maternity, and race.
- 1.8 An EqIA was then completed by Steer on behalf of CoL to assess the overall impact of the project for all road users and for those who share one or more protected characteristic. This EqIA was completed prior to the implementation of the design to pre-empt any potential disproportionate impacts upon these protected groups and suggested alterations and additions where they may have been necessary.
- 1.9 The EqIA was based on information supplied by CoL as well as readily available data from other sources. This included traffic counts, pedestrian and cyclist counts, bus journey time modelling and background information through the Bank on Safety scheme.

## EqIA for traffic restrictions review (February 2023)

- 1.10 In a motion passed at the Court of Common Council in April 2022, elected members agreed to review the traffic restrictions currently in force at Bank junction, with the potential to amend the restrictions to allow access to taxis (black cabs only) and powered two wheelers (P2Ws). Since 2017, only buses, cyclists and pedestrians have been allowed to access Bank junction between 7am and 7pm on weekdays.
- 1.11 To establish the likely equality impacts on revising the modes permitted through the finalised scheme, Steer was commissioned to undertake an additional EqIA to assess the likely impacts of allowing the following vehicular mixes through Bank junction:
- Scenario 1: Buses, cycles, and taxis
  - Scenario 2: Buses, cycles and P2Ws
  - Scenario 3: Buses, cycles, taxis and P2Ws
  - Scenario 4: Buses, cycles, and all motor traffic

- 1.12 In each of these scenarios, the arms of the junction available for those vehicles would be the same as those available to buses and cycles in the scheme that is currently under construction, which are Cornhill, King William Street/Lombard Street, Poultry and Princes Street.
- 1.13 The existing baseline information produced for the November 2021 EqIA was updated with the most recent London Travel Demand Survey (LTDS) and Census 2021 data, as well as new modelling inputs supplied by CoL to establish impacts on journey times.

## EqIA update following additional data collection (March 2024)

- 1.14 Since the February 2023 EqIA update, additional research was conducted to provide supplementary data to enhance understanding of the potential impacts of restricting taxi access for people who rely upon taxis as essential mobility.
- 1.15 Steer was commissioned to analyse these additional findings in relation to taxi access, which is presented as an addendum to the February 2023 EqIA in the **Technical Note: Analysis of Additional Datasets**, which is appended to this document. This main document (February

2023 EqIA) has also been updated with the most recent datasets and literature now available to support the assessment.

- 1.16 A summary and conclusions from the Analysis of Additional Data sets can be found within Chapter 5 of this report.

## 2 Baseline

### General

#### Workforce

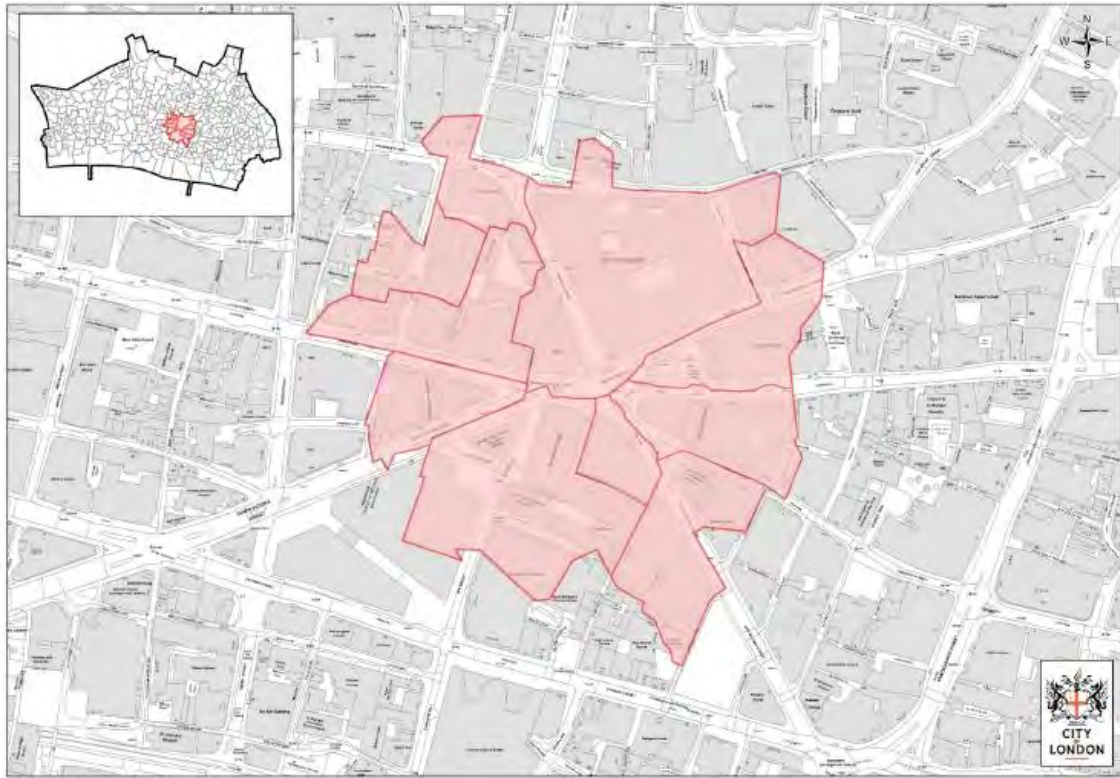
- 2.1 CoL has a very large workforce in comparison to its usual residential population. The 2021 Census recorded the residential population as 8,600 people and the 2011 Census recorded the workforce as 357,000 people<sup>1</sup> – over 40 times the usual residential population which demonstrates the significant movement in and out of CoL every day.
- 2.2 More recently, the 2022 workforce was estimated to be 615,000<sup>2</sup>. CoL shows the highest workplace density of all local authorities in Greater London with the primary land use in CoL being offices, which make up more than 70 per cent of all buildings. In absolute terms, CoL has the second greatest workforce after the City of Westminster, with a gender split of 63 per cent males and 37 per cent females in 2021.
- 2.3 The workforce located within the Bank junction Workplace Zone, as defined in the zone shown in **Figure 2.1**, amounts to 9,100 people. **Figure 2.2** shows that the workforce's age profile in the Bank junction Workplace Zone follows a similar trend to that of CoL as a whole, with the most common age group being those aged 30-34. The workforce aged 55+ in the Bank junction Workplace Zone is lower when compared to the workforce aged 55+ across CoL as a whole.

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<sup>1</sup> 2021 Census data indicates that 67,224 people recorded their workplace destination within CoL, which similarly represents a significantly higher workforce population in comparison to the resident population. However, 2021 Census data does not capture the workforce accurately due to the effects of the Covid-19 pandemic and associated restrictions on movement and social gatherings at the time of recording (see [https://www.nomisweb.co.uk/sources/census\\_2021\\_od](https://www.nomisweb.co.uk/sources/census_2021_od))

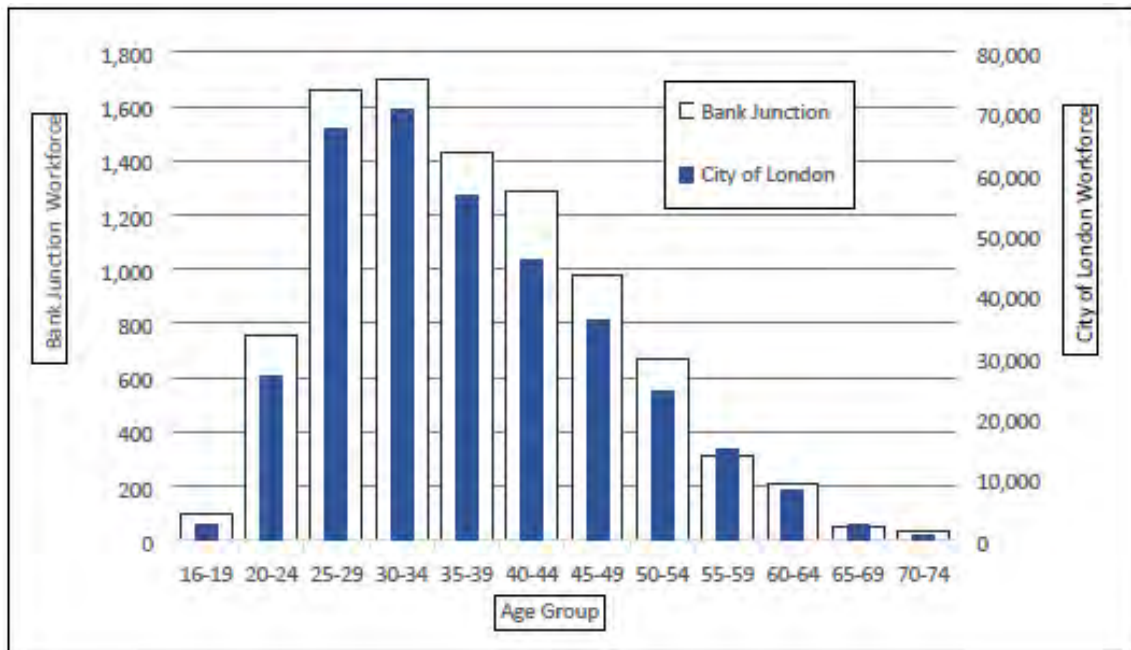
<sup>2</sup> [City of London Factsheets February 2023](#)

**Figure 2.1: Bank Workplace Zone**



Source: Bank on Safety Equality Analysis with data from Office for National Statistics

**Figure 2.2: Age of daytime occupants within the Bank junction Workplace Zone**



Source: Bank on Safety Equality Analysis with data from 2011 Census

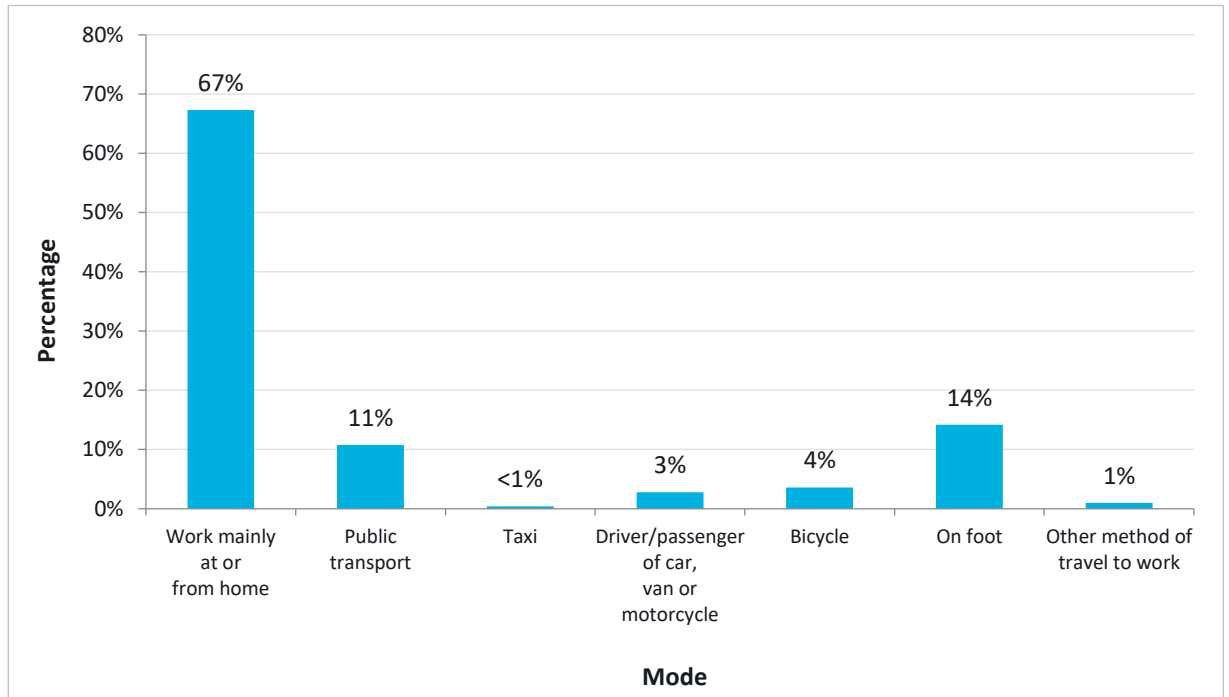
2.4 When compared to Greater London, CoL has a higher proportion of professional occupations, associated professional and technical occupations, skilled trades occupations, and

administrative and secretarial occupations. Professional and associate professional/technical occupations represent over half of occupations within CoL.

2.5 2021 Census data shows most people in employment in CoL work mainly at or from home, as shown in **Figure 2.3**. This is followed by public transport use (11 per cent). Active travel also comprises a relatively high percentage of travel (14 per cent on foot, and 4 per cent cycling).

2.6 Please note that these figures have changed significantly since 2021 due to the change in working arrangements and patterns attributed to the COVID-19 pandemic, however CoL can only act on the latest data available.

**Figure 2.3: Method of travel to work for people in employment in the City of London**

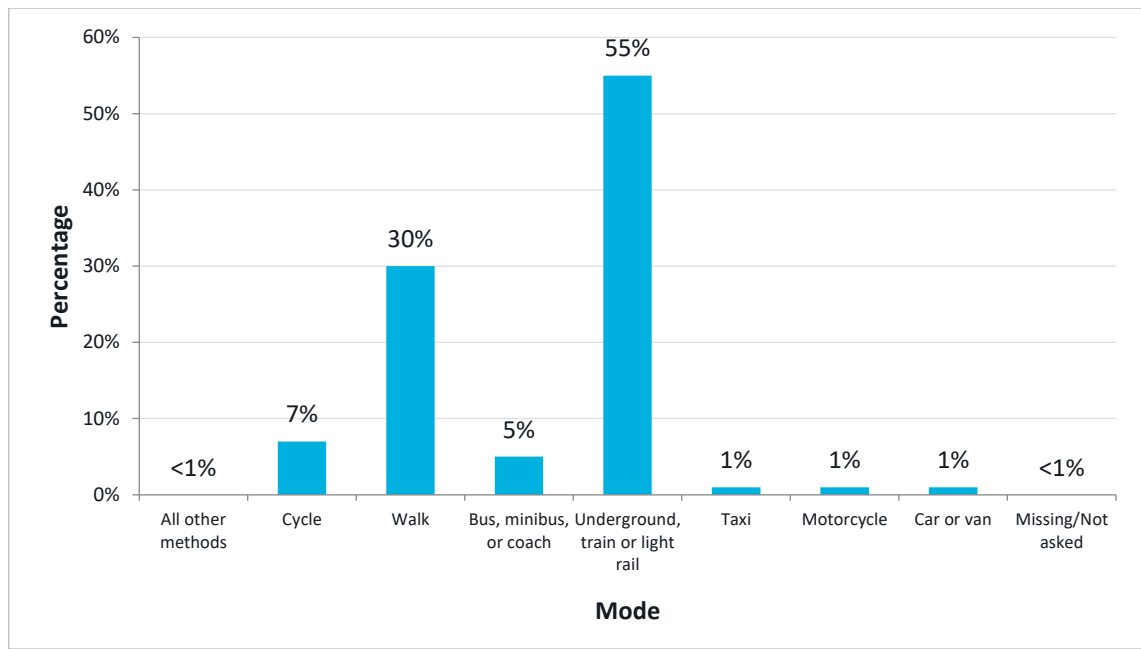


Source: 2021 Census

2.7 Data from TfL’s London Travel Demand Survey (LTDS) 2019/20 has been analysed to inform this EqIA, to understand any differences in the travel patterns exhibited by people with different protected characteristics. LTDS is an annual survey of a sample of households across Greater London including CoL. The survey records detailed information about the household, the people that live there, and the trips they make. Every year, approximately 8,000 households take part in the survey which is then weighted using an interim expansion factor to approximate the data for the entire population of London, thus providing an insight into how Londoners travel on a weekly basis. For the purposes of this EqIA, trips that ended in CoL have been analysed. Due to the London-wide nature of this survey, it has not been possible to limit the analysis to trips ending in the Bank junction area, as the low sample size means that it would not be appropriate.

2.8 When analysing LTDS for all trip purposes, the following mode split for travel into CoL was obtained. As shown in **Figure 2.4**, of all trips ending in CoL, 60 per cent are made using public transport. 55 per cent of trips are made using the Underground or other rail modes and 5 per cent are made by bus. It can also be seen that walking has a much higher proportion for all trips (30 per cent) when compared to the 2011 Census Travel to Work data (5 per cent).

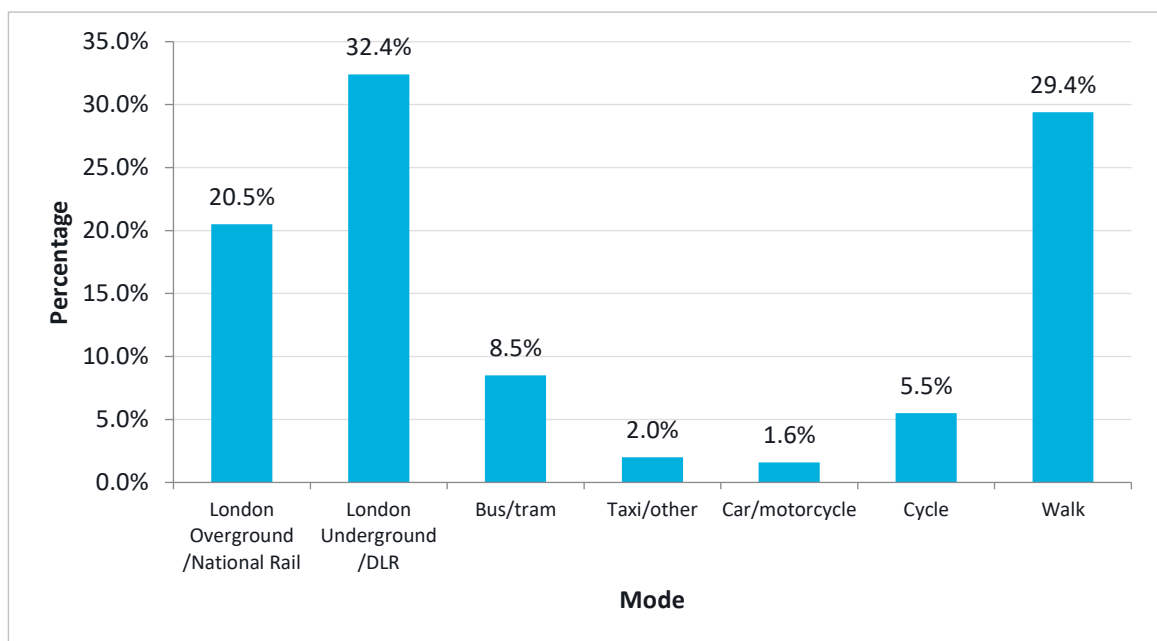
**Figure 2.4: Method of travel to the City of London for all purposes**



Source: LTDS 2019/20

- 2.9 Please note that this mode split involves other trip types in addition to ‘travel to work’ trips. Based on the 2019/20 LTDS data for trip purposes to CoL of London, 71 per cent of trips were for Work (usual workplace and other) and 29 per cent of trips were for other purposes (such as leisure and shopping).
- 2.10 At the time of preparing this document, the full LTDS 2022/23 dataset was unavailable. However, data was obtained by CoL from TfL’s Strategic Analysis which illustrates the proportions for trips per day, by mode. As shown in **Figure 2.5**, active travel trips comprise nearly a third of journeys that originate within the CoL, and over 60 per cent of journeys

**Figure 2.5: Percentage of trips per day, by mode, originating within CoL (2022/23)**



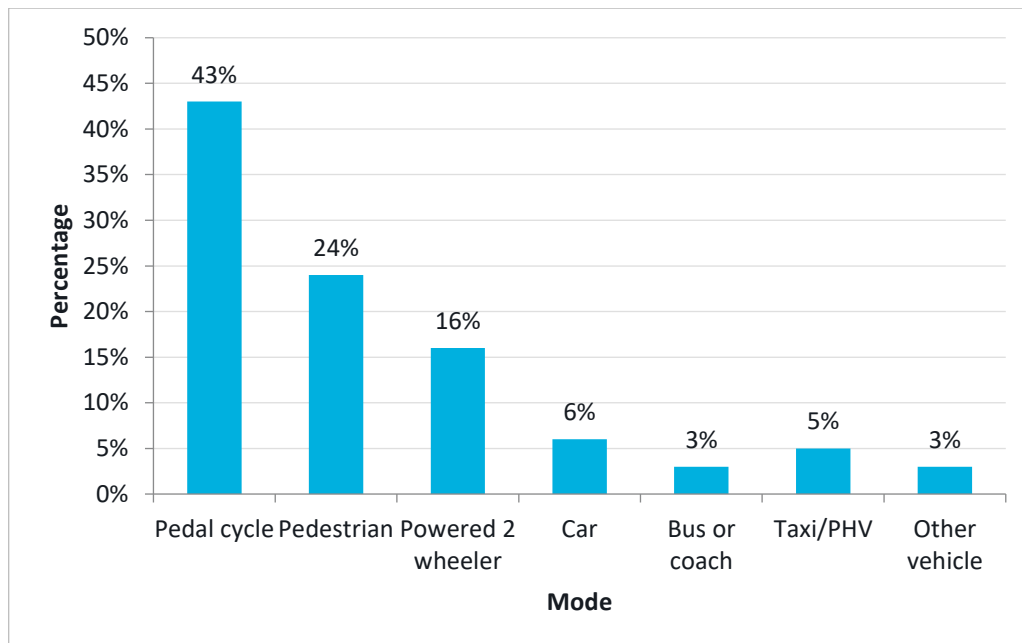
originating in CoL via public transport. In contrast, a small proportion of trips per day are made by private vehicle (3.6 per cent).

- 2.11 The more recent data in **Figure 2.5** indicates that a relatively small proportion of trips that originate within CoL are made by taxi (2 per cent) and car/motorcycle (1.6 per cent). This reflects the proportion of modes in the LTDS 2019/20 data for CoL, in relation to method of travel to CoL for all trip purposes, wherein 60 per cent of trips were made via public transport, and over a third of trips were made by active travel (37 per cent).
- 2.12 Proportions of private vehicles, including car, taxi, and van (1 per cent mode share each, respectively) are also comparable to the 2022/23 data in relation to journeys originating within CoL. This suggests that travel patterns have returned after the COVID-19 pandemic, however, other factors may have also influenced mode share across CoL between 2019/20 and 2022/23.

**Road safety**

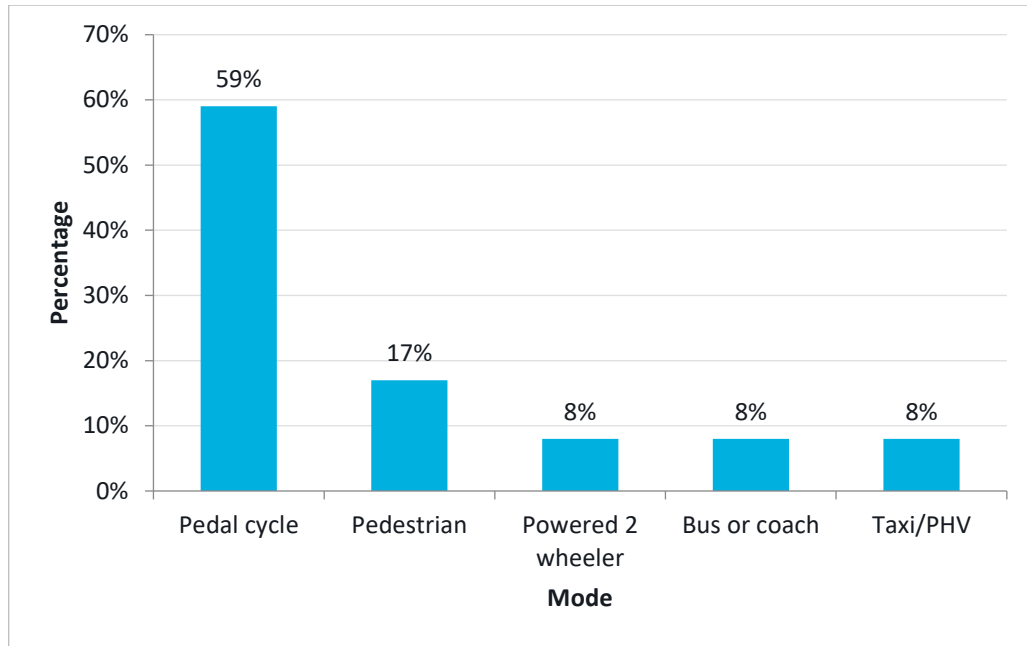
- 2.13 STATS19 (the national database containing a record of reported road traffic accidents) data has been analysed for road safety analysis. **Figure 2.6** and **Figure 2.7** below show the travel mode splits for collisions in CoL and Bank junction. Casualties using active modes accounted for 68 per cent and 96 per cent of all casualties involved in collisions in CoL and Bank junction, respectively. Pedal cyclists and pedestrians saw a higher proportion of casualties at Bank junction compared to CoL. It should be noted that bus or coach collisions are often described as passengers’ falls due to sudden braking, and they rarely involve any vehicle impact.
- 2.14 Analysis of the collisions within Bank junction has been undertaken. Where Bank junction is referred to in the STATS19 2020-2022 dataset, collisions and casualties have been calculated based on a 50-metre radius from the centre of Bank junction.

**Figure 2.6: Mode of travel for casualties involved in collisions for City of London**



Source: STATS19 2020-2022

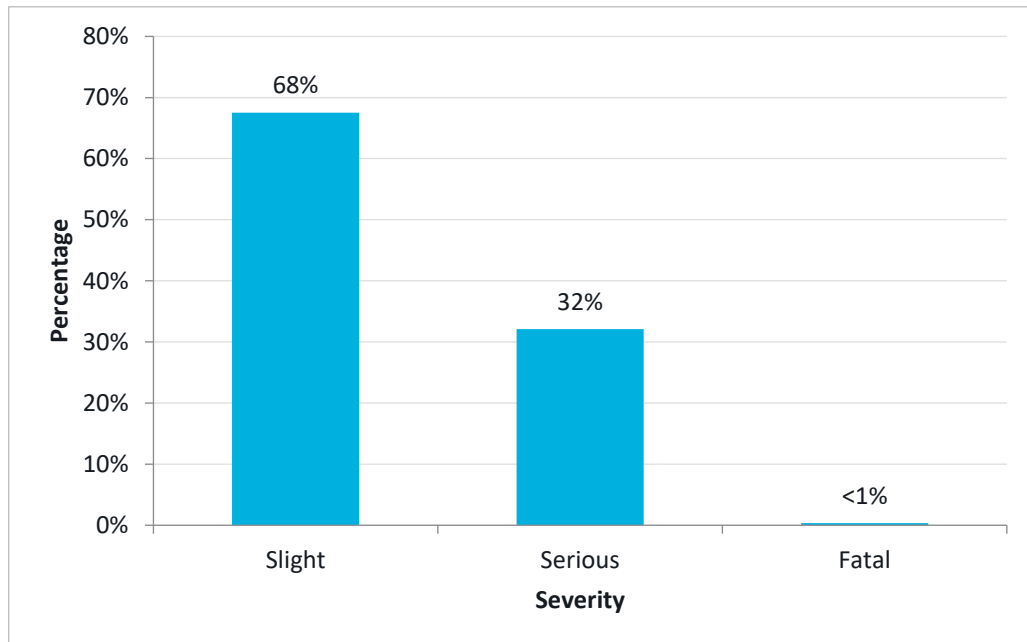
**Figure 2.7: Mode of travel for casualties involved in collisions for Bank junction**



Source: STATS19 2020-2022

2.15 **Figure 2.8** and **Figure 2.9** show the severity of incidents between 07:00 and 19:00 Monday to Friday for City on London and Bank junction. KSIs (Killed or Seriously Injured) account for 32.5 per cent of casualties involved in collisions from 2020-2022 in CoL. KSIs<sup>3</sup> account for a smaller percentage of casualties at Bank junction, with 13 per cent of incidents resulting in KSIs.

**Figure 2.8: Severity of incidents for City of London Monday to Friday 07:00 – 19:00**

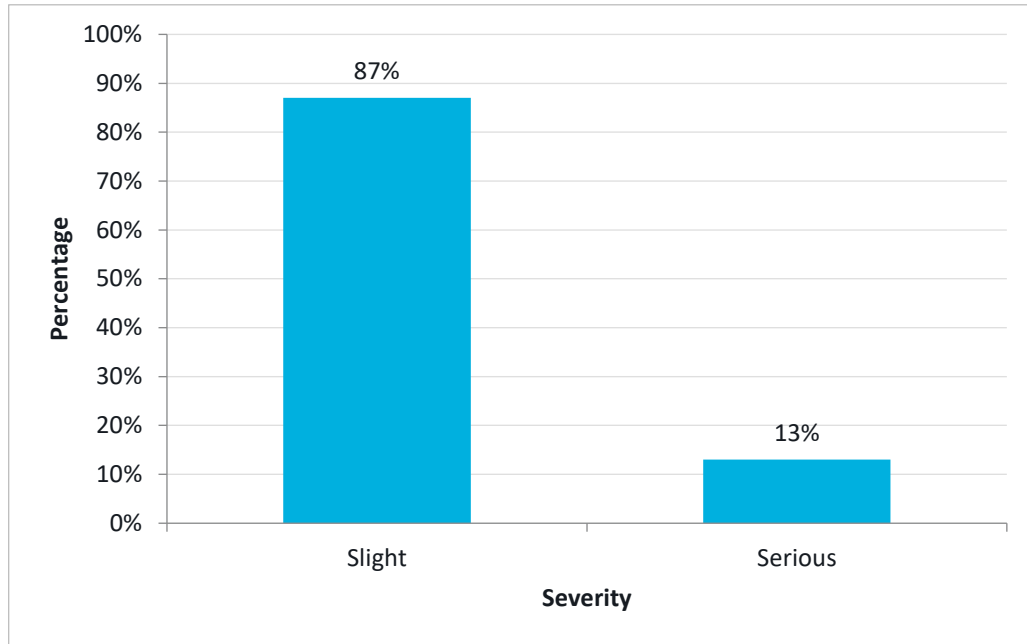


<sup>3</sup> Please note that no fatalities were recorded in STATS19 data for the Bank junction area, 2020 – 2022.



Source: STATS19 2020-2022

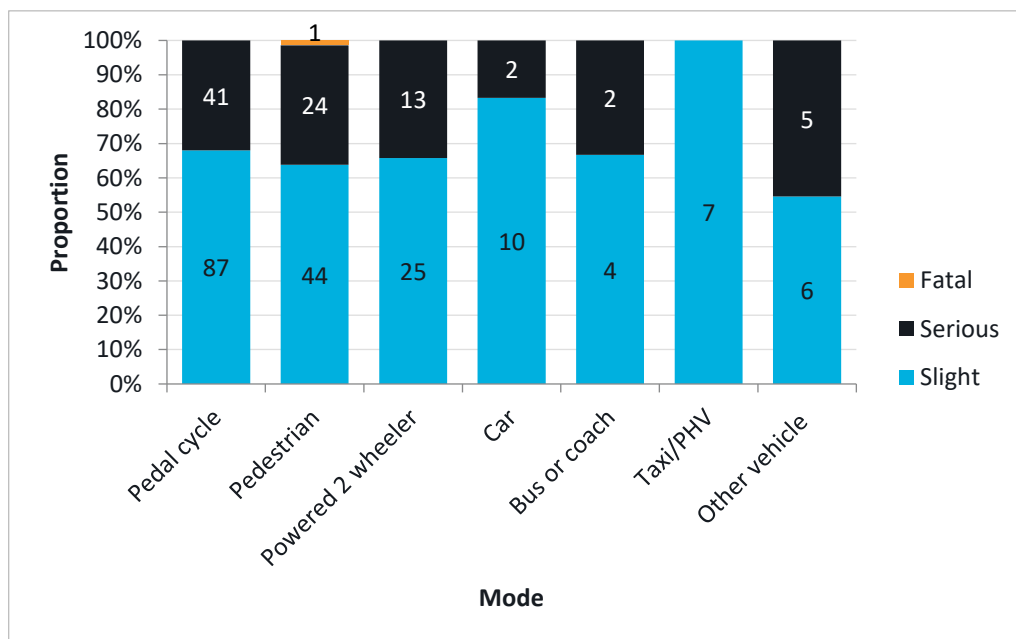
**Figure 2.9: Severity of incidents for Bank junction Monday to Friday 07:00 – 19:00**



Source: STATS19 2020-2022

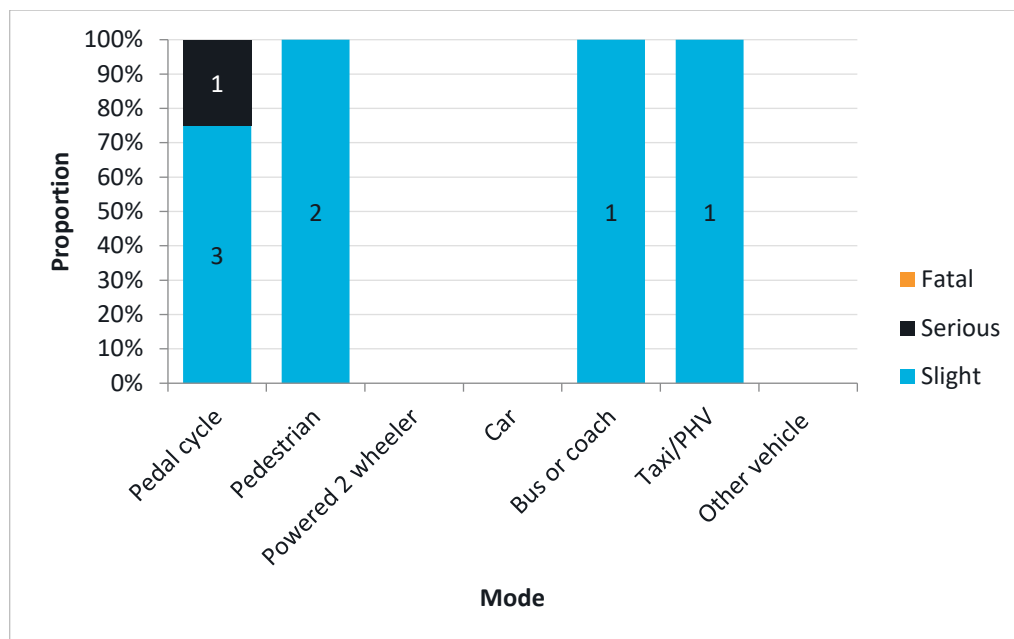
2.16 Based on 2020-2022 STATS19 data, there were 462 casualties across the whole of CoL between 07:00 and 19:00 Monday to Friday associated with vehicle collisions, which are broken down by vehicle type in **Figure 2.10**. At Bank junction, there were 12 casualties between 07:00 and 19:00 Monday to Friday associated with vehicle collisions, these are broken down by vehicle type in **Figure 2.11**.

**Figure 2.10: Proportion of casualties for City of London by vehicle type Monday to Friday 07:00 – 19:00**



Source: STATS19 2020-2022

**Figure 2.11: Proportion of casualties for Bank junction by vehicle type Monday to Friday 07:00 to 19:00**

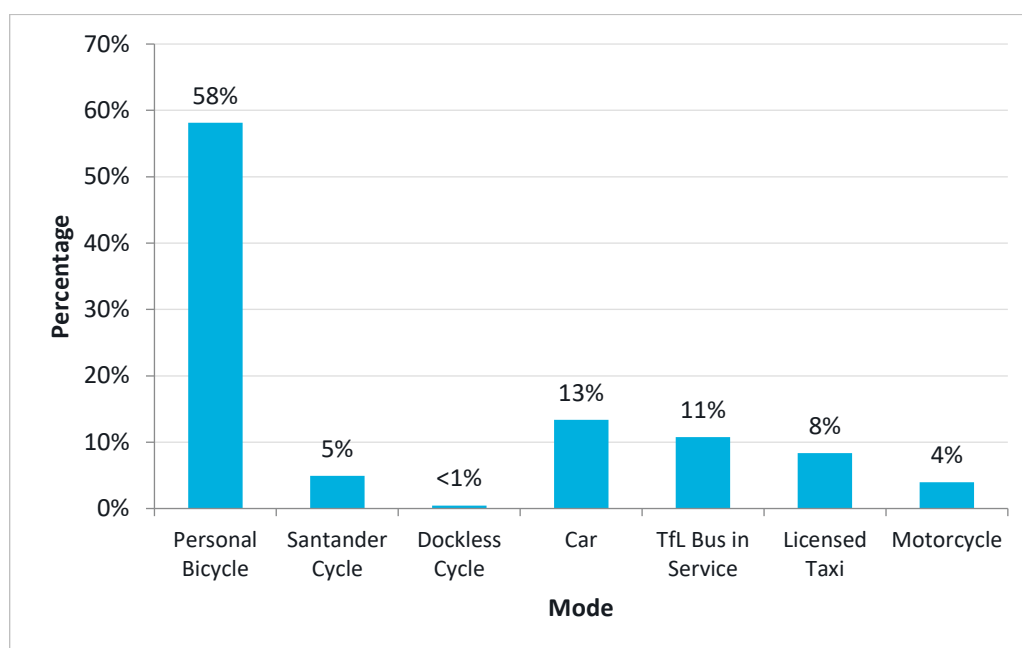


Source: STATS19 2020-2022

### Mode share

- 2.17 A traffic count was undertaken at Bank junction in 2019. This counted all vehicle movements, excluding pedestrian movements. During these timeframes, 14,351 movements were recorded. **Figure 2.12** shows a breakdown of selected modes that may have an impact certain on people who share one or more protected characteristics.
- 2.18 Based on movements only, with the Bank on Safety scheme in place, cyclists account for most movements (8,706), followed by private car (1,832), in service TfL buses (1,478) and licensed taxis (1,146). Please note that these are vehicle movements and not the total number of passengers. These movements are shown by arm in **Table 2.1**.

**Figure 2.12: Bank on Safety traffic counts (5:00-10:00 and 16:00-21:00) – Passenger modes that may affect certain protected characteristics**



Source: Data from Tracsis Junction Turning Count Data, Bank on Safety (November 2019).

Note: This figure excludes non-passenger modes.

**Table 2.1: Bank on Safety traffic counts (5:00-10:00 and 16:00-21:00) by junction arm - Selected modes that may affect certain protected characteristics**

Junction Arm	Cyclists	In Service Tfl Buses	Licensed Taxis	Private Car
Princes Street	1,881	196	165	311
Poultry	841	171	163	90
Queen Victoria Street	1,549	142	312	412
Lombard Street / King William Street (KWS)	2,772	570	184	491
Cornhill	807	142	107	236
Threadneedle Street	853	305	215	290

Source: Tracsis Junction Turning Count Data, All Change at Bank (November 2019).

Note: This figure excludes modes that are not expected to have an impact on protected characteristics (ex. LGV, HGV). Please note these are vehicle movements and not the total number of passengers.

- 2.19 Pedestrian counts from the Bank on Safety project in 2018<sup>4</sup> show approximately 59,000 and 54,000 pedestrian movements in the AM (8:00-9:00) and PM (17:00-18:00) peak periods, respectively. The same study counted 2,200 cyclist movements in the AM Peak (8:00-9:00). **Figure 2.13** shows the locations and counts of pedestrian movements while **Figure 2.14** shows the existing pedestrian comfort levels as of November 2018.
- 2.20 In both the AM and PM peak periods, the highest single flow occurred on Princes Street while the highest two-way flow occurred on the southern footway of Mansion House Street. The

<sup>4</sup> Bank on Safety – Pedestrian and Cyclist Movement Update, City of London (November 2018).

highest level of informal crossing in both the AM and PM peaks occurred at the Queen Victoria arm between the southern footway of Mansion House Street and Walbrook.

Figure 2.13: Pedestrian Counts AM Peak 8AM-9AM (top) and PM Peak 5PM-6PM (bottom)



Source: Bank on Safety – Pedestrian and Cyclist Movement Update, City of London (November 2018)

**Figure 2.14: Pedestrian comfort levels**



- 2.21 The traffic and pedestrian counts demonstrate that Bank junction is used most by pedestrians, and when looking at vehicle movements, this is followed by cyclists, private car, TfL bus services and licensed taxis. Currently, we do not have exact bus passenger numbers. This demonstrates that the pedestrian priority measures that have been implemented at Bank junction will benefit the people who use the junction most (pedestrians and cyclists) by providing a safer journey, better air quality, and improved pedestrian experience.
- 2.22 A more recent traffic count was undertaken in November 2022. This recorded that cyclists were the largest proportion of vehicles through Bank junction between the combined peak hours of 7am to 10am and 4pm to 7pm (6 hours in total), with 6,248 cycles recorded. 52,075 ‘designated crossing’ movements were made by pedestrians, with a further 12,526 informal crossing movements undertaken by pedestrians. This demonstrates that there has been a reduction in the number of people walking and cycling at Bank junction in comparison to 2019, however, this is likely due to the impacts of travel due to the COVID-19 pandemic<sup>5</sup>.

### Age

- 2.23 Based on 2021 Census data, CoL has approximately 8,600 residents, 55 per cent of these being male and 45 per cent being female. Residents most commonly fall into the 25-34 and 35-49 age groups for both genders. When compared to Greater London, CoL has proportionately more people aged between 25 and 69 living in the Square Mile. Conversely there are fewer young people<sup>6</sup>. People aged over 65 represent 14 per cent of the residential population.
- 2.24 2011 Census data focusing on the workforce in CoL shows that the majority of workforce ages again fall within the 25-29 and 30-34 age categories for both genders, making up 39 per cent of the total workforce. Those aged between 16 and 24 only make up 9 per cent of the workforce population. It can also be noted that as age increases, there is a steady decrease in

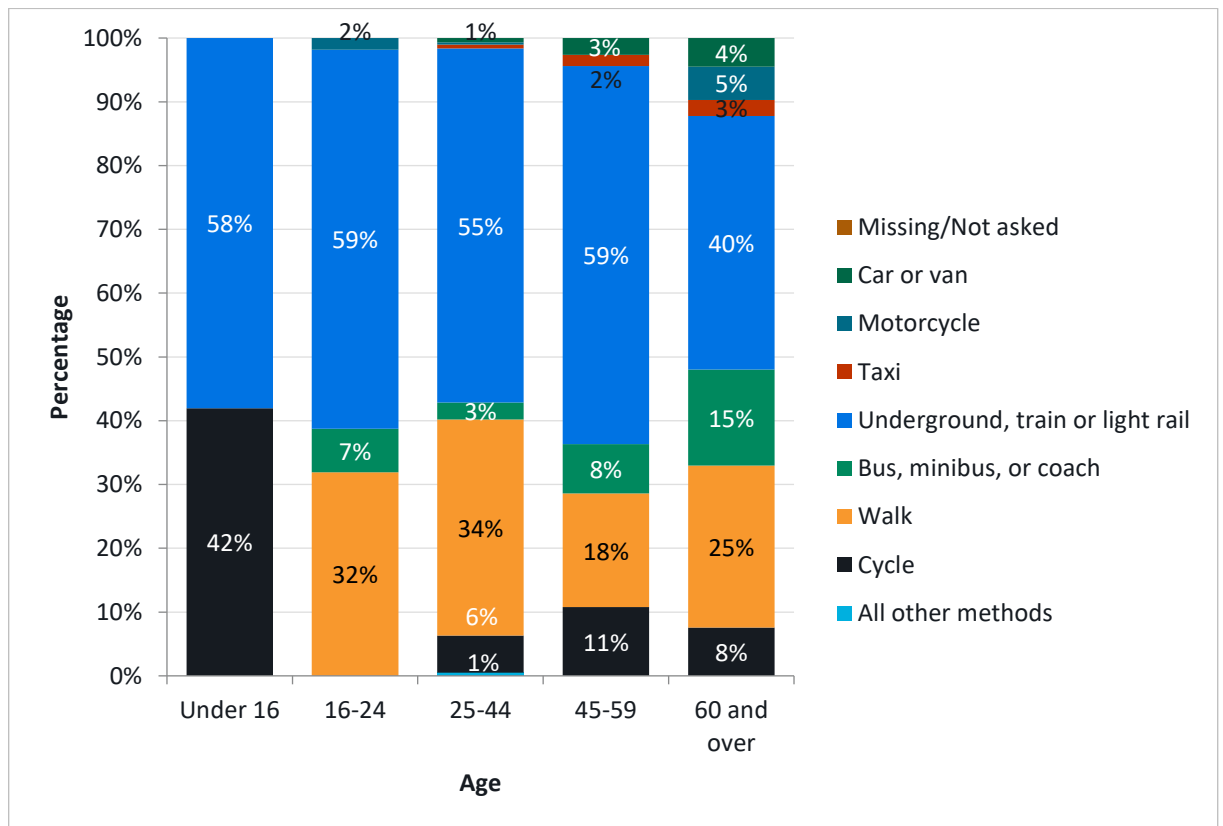
<sup>5</sup> [Committee Report Template \(cityoflondon.gov.uk\)](https://www.cityoflondon.gov.uk)

<sup>6</sup> [City of London Resident Estimates and Projections](#)

the proportion of the workforce within each age category. The age categories of 60-64 and 65+ represent 2 per cent and 1 per cent of the workforce population, respectively.

- 2.25 The 2011 Census data for each age category shows that 78-85 per cent of the workforce relies on public transport to travel to work. The lowest percentage of people driving a car or van falls within the 25-29 age category (2 per cent) and steadily increases as age increases. This proportion also is also slightly higher for the 20-24 (3 per cent) and 16-19 (5 per cent) age groups. A disproportionately high percentage of those aged 65 to 75 rely on driving a car or van (11 per cent) to travel to work. Generally, as age increases, reliance on driving a car or van to travel to work increases.
- 2.26 The highest proportion of cyclists (5 per cent) are within the 25-29 and 30-34 age categories. Cycling as a mode share decreases with age, falling to 1 per cent by the age of 60 onwards. The proportion of people who walk to work falls within the younger age categories from 16 to 34 (ranging between 5 per cent and 8 per cent). The proportion of walkers remains steady at 3 per cent from age 35 to 64 and increases slightly to 4 per cent for those aged 65 to 74.
- 2.27 As age increases, people are more likely to develop impairments relating to sight, hearing, and mobility, therefore those above the age of 65 are more likely to be disproportionately affected by these potential impairments, though the absolute number of both residents and workforce fitting this description is expected to be quite low.
- 2.28 LTDS 2019/20 analysis for trips made for all purposes ending in CoL shows the following mode shares, **Figure 2.15**, per age category.

**Figure 2.15: Mode split by age category for travel to the City of London**

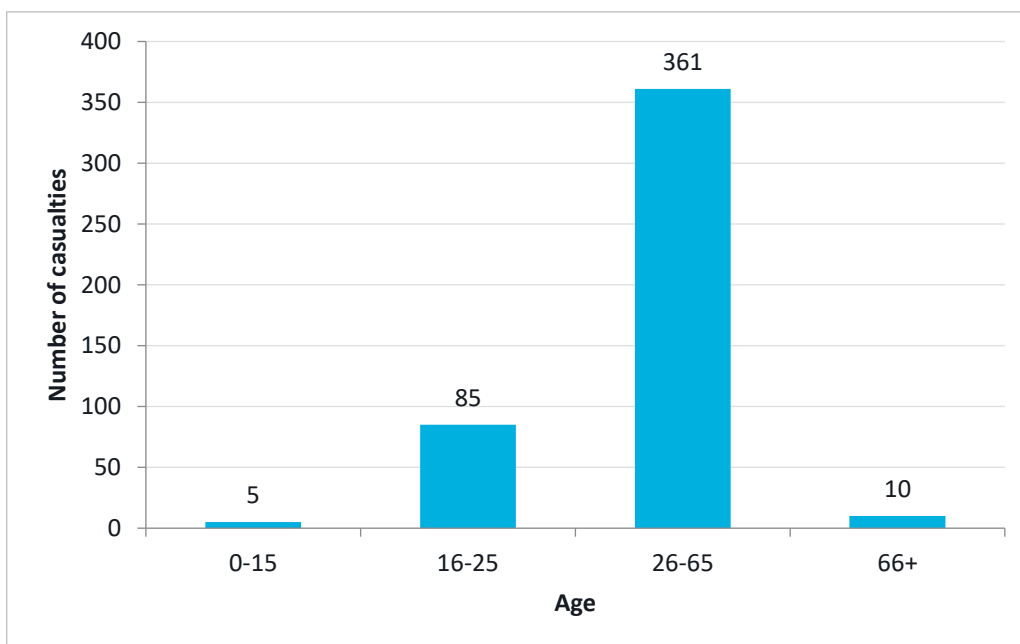


Source: LTDS 2019/20

2.29 Those aged 16-24 and 25-44 have a higher mode split for walking compared to the baseline. Those aged 0 to 15 have higher cycling use. Those aged over 60 show a higher proportion of bus use, and a lower proportion of Underground or other rail mode use. The majority of all other age groups use the Underground or other rail modes.

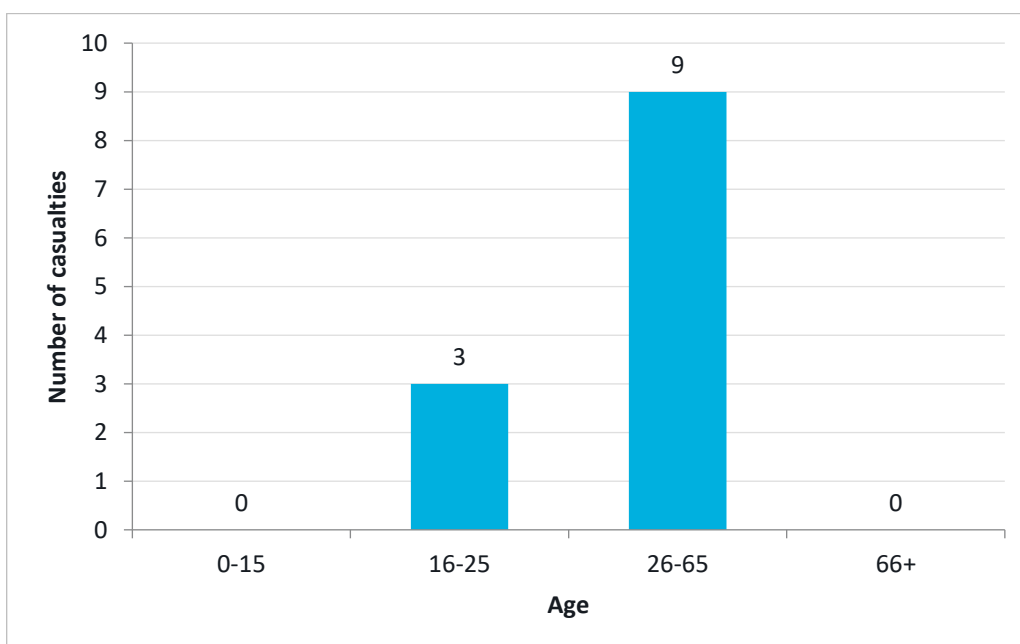
2.30 **Figure 2.16** shows collision casualties by age category. It can be seen that compared to CoL as a whole, those aged 16-24 and those aged 60+ account for a slightly higher proportion of casualties at Bank junction, at 22 per cent and 11 per cent, respectively.

**Figure 2.16: Age of casualties involved in collisions, CoL**



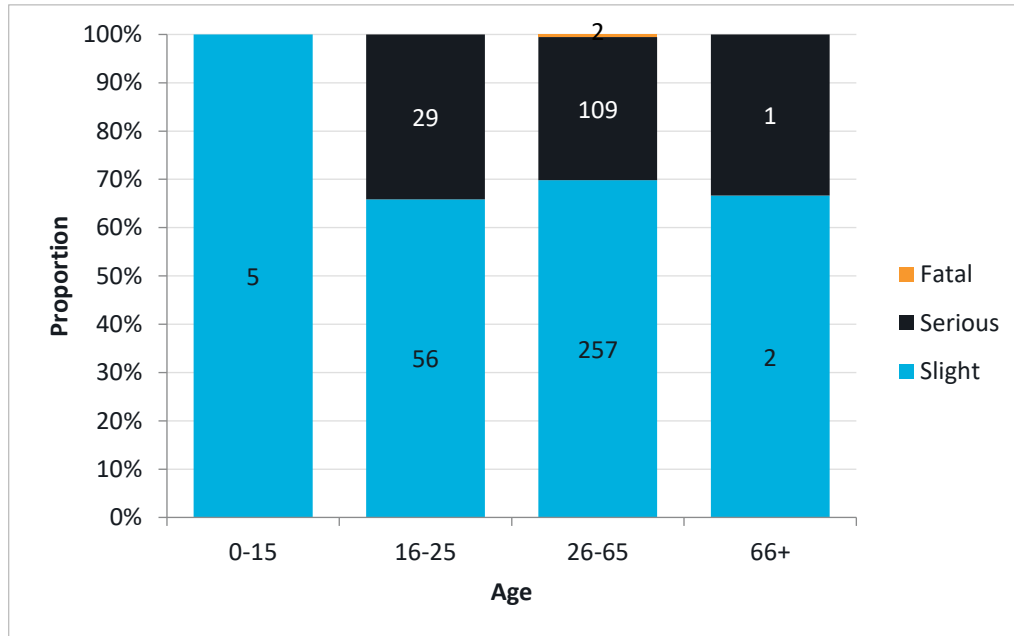
Source: STATS19 2020-2022

**Figure 2.17: Age of casualties involved in collisions, Bank junction**



2.31 The proportion of KSI and Slight casualties per age category in CoL is shown in **Figure 2.18** below. On average across all age groups, KSIs account for 32.5 per cent of all casualties involved in collisions from 2020-2022 in CoL. Based on this, KSIs are higher than average for those age 60+ (33.3 per cent) and those aged 26-59 (34.1 per cent). This indicates that these age groups are more likely to suffer more severe consequences if they are a casualty in a collision.

**Figure 2.18: Proportion of KSI and Slight casualties involved in collisions per age category, in CoL**



Source: STATS19 2020-2022

## Disability

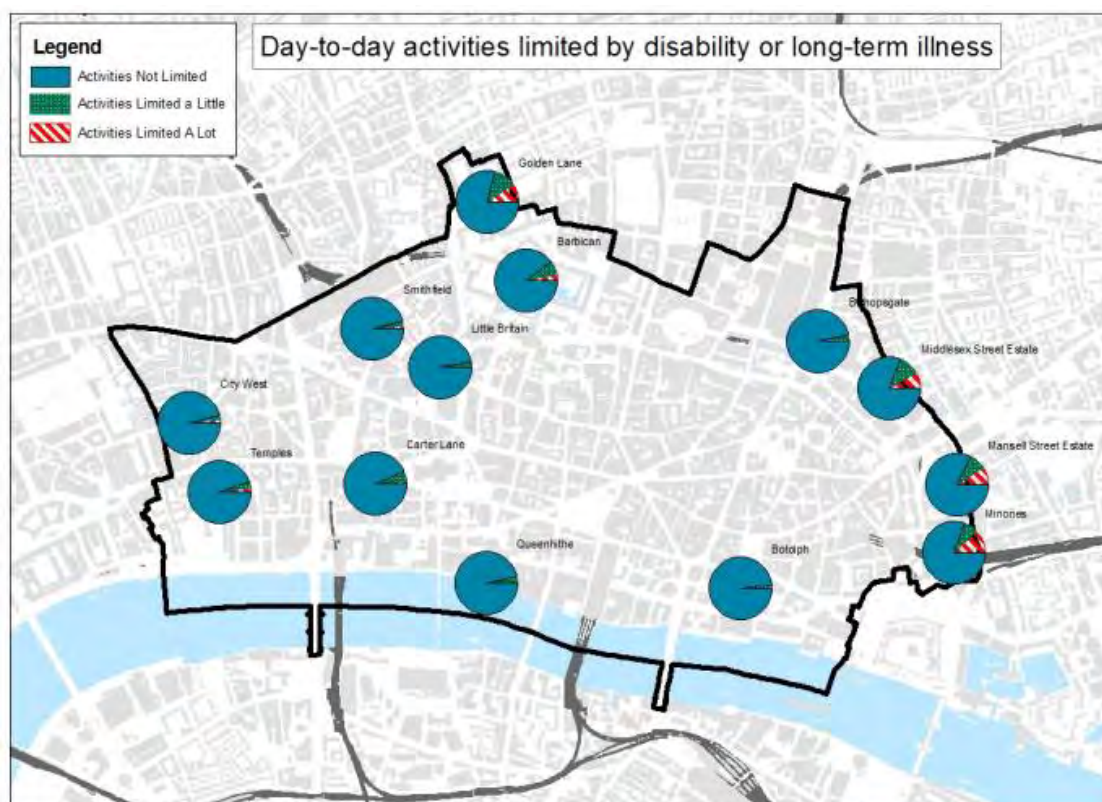
2.32 Day-to-day activities can be limited by disability or long-term illness. According to 2021 Census data, in CoL as a whole 89 per cent of residents feel they have no limitations in their activities – this is higher than both in England and Wales (83 per cent) and Greater London (87 per cent). In the areas outside the main housing estates, around 95 per cent of residents responded that their activities were not limited. 11 per cent of CoL’s residential population stated that they were either in fair, bad or very bad health.

2.33 The spatial distribution of health-based activity limitations can be seen in **Figure 2.19** based on Census data<sup>7</sup>. Generally, areas to the east of CoL and north of CoL are more likely to have activities limited by disability or long-term illness.

<sup>7</sup> <https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics>



Figure 2.19: Day-to-day activities limited by disability or long-term illness



Source: 2011 Census

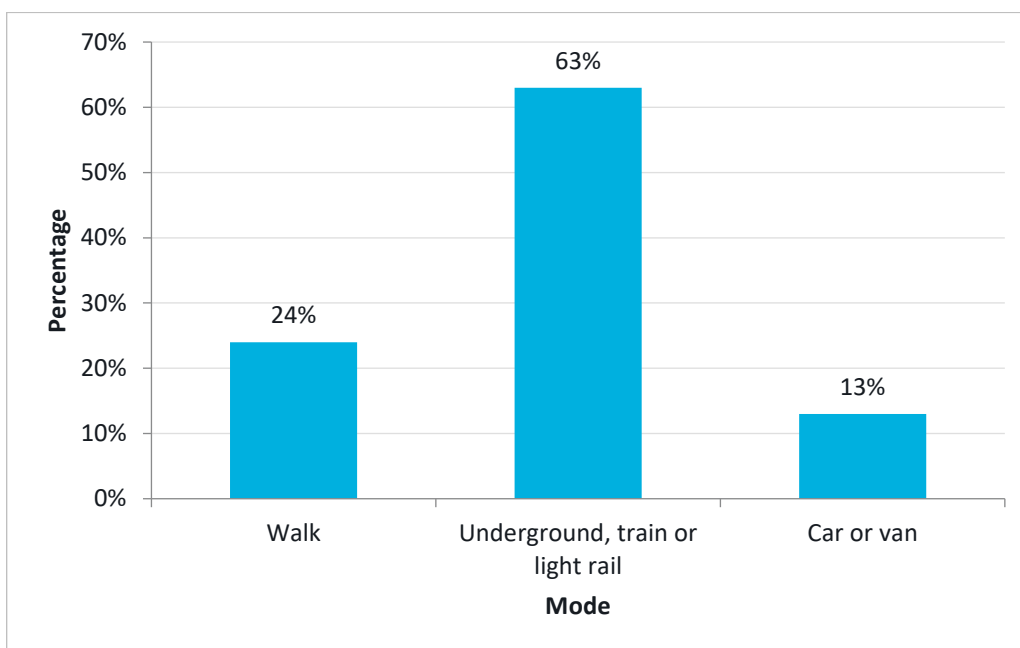
- 2.34 1.7 per cent of the residential population in the CoL are blue badge holders, which makes the CoL one of the five local authorities with the lowest number of Blue Badges across the United Kingdom<sup>8</sup>.
- 2.35 Across the UK focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey<sup>9</sup> shows that 72 per cent of disabled cyclists use their bike as a mobility aid, and 75 per cent found cycling easier than walking. Survey results also show that 24 per cent of disabled cyclists use a bike for their job or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.
- 2.36 LTDS 2019/20 analysis shows that 1.3 per cent of trips made into CoL are made by someone who has a mental or physical disability affecting daily travel (including old age). The mode split for these trips is shown in **Figure 2.20**.

8

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/759944/blue-badge-scheme-statistics-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759944/blue-badge-scheme-statistics-2018.pdf)

<sup>9</sup>Wheels for Wellbeing Annual Survey 2018: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf>

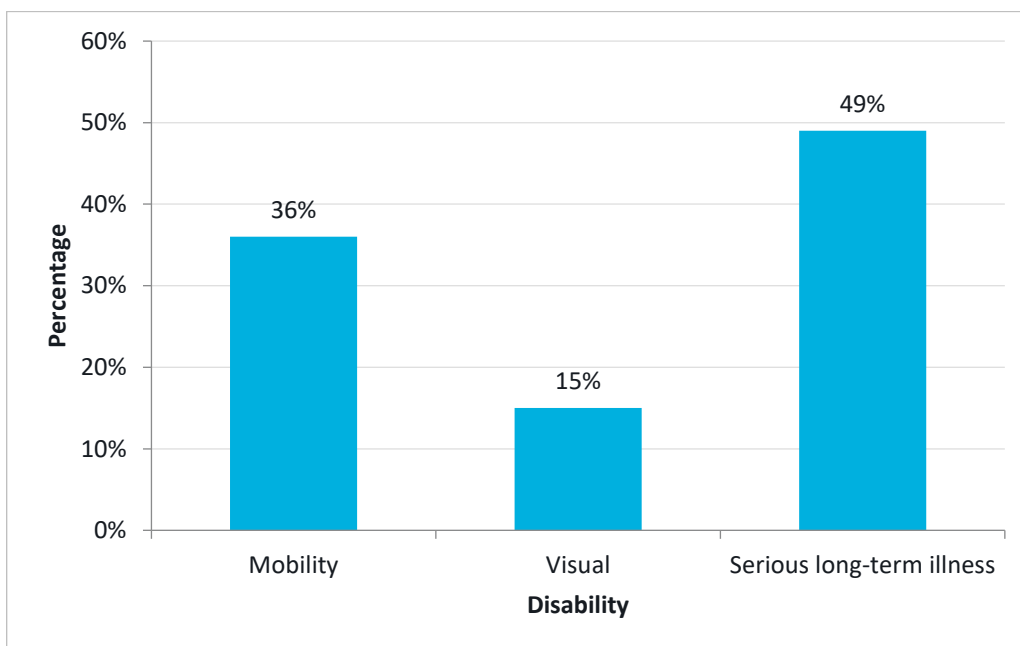
**Figure 2.20: Mode split by people with a physical or mental disability affecting daily travel to the City of London (including old age)**



Source: LTDS 2019/20

2.37 When comparing to the LTDS mode split of trips made by all people, underground or other rail mode use for disabled people is higher (63 per cent compared to 55 per cent), car trips are significantly higher (13 per cent compared to 1 per cent) and walking is lower (24 per cent compared to 30 per cent). Disability types stated by those who have a disability affecting daily travel (including old age) are shown in **Figure 2.21** below.

**Figure 2.21: Disability types stated by those who have a disability affecting daily travel to the City of London**



Source: LTDS 2019/20

- 2.38 It can be seen that impairment due to serious long-term illness represents the highest proportion followed by mobility impairment. It should be noted that this data is based on a very small sample (1.3 per cent of sample size for trips ending in CoL), therefore results should be taken as general. It is important to note that various physical and mental impairments can lead to travel limitations.

### **Pregnancy / maternity**

- 2.39 The birth rate in CoL was 7.0 births per 1000 people in 2021, approximately 50 per cent below the national average that year of 10.5. Therefore, there are statistically less likely to be pregnant or newly postnatal people who reside in CoL. However, this represents only the residents of CoL, not the 615,000 people who work in the Square Mile, and CoL is principally a working population. A proportion of this workforce will be pregnant and/or have infants or small children at any point in time.
- 2.40 Considering that the residential population of CoL is quite small, it is unlikely that there will be a significant number of pregnant women and parents with infants and/or small children residing in CoL at any given time. However, the numbers of pregnant women or parents with infants and/or young children that travel in and out of CoL for work or leisure purposes may be higher.

### **Race**

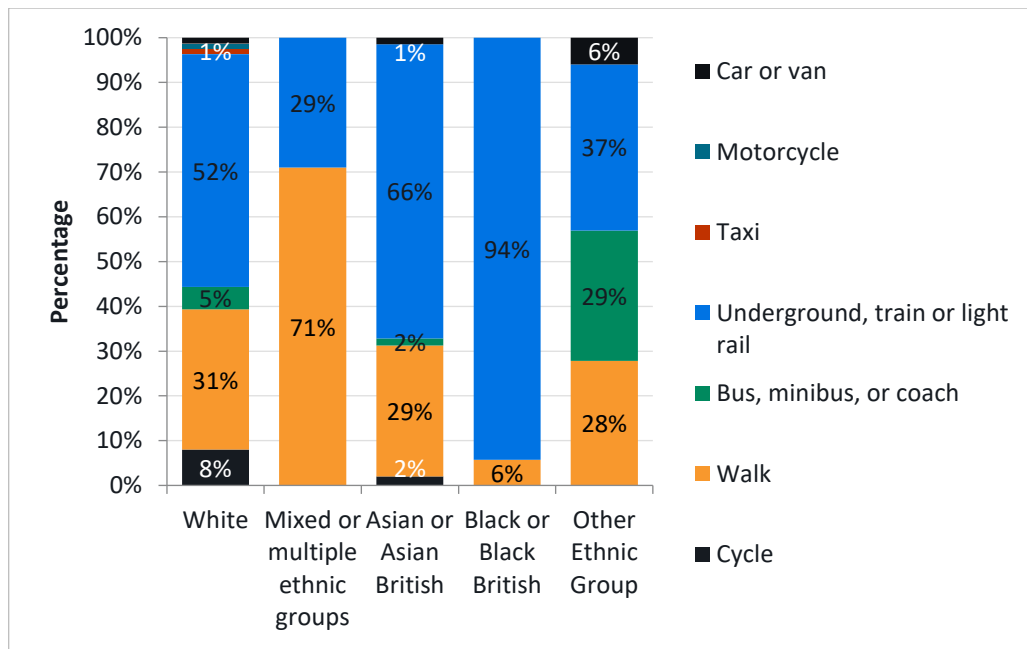
- 2.41 64 per cent of CoL's residential population hold a UK passport and 16 per cent hold non-European passports. When looking at race per area in CoL, 79 per cent of the residential population is 'White'. There is a higher proportion of Asian population (47 per cent) on Mansell Street, to the east of the study area, when compared to other areas in CoL while the Asian population across CoL is 17 per cent<sup>10</sup>.
- 2.42 The Asian population is approximately evenly split between Asian-Indian, Asian-Bangladeshi, Asian-Chinese and Asian-Other. CoL has the highest and second-highest population of Asian-Chinese in Greater London and England/Wales respectively. The 'Black' population is low compared to Greater London and England/Wales at 2.6 per cent. The remaining population identifies as mixed ethnicity (4 per cent) or other.
- 2.43 TfL data, for Greater London, shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65 per cent compared with 56 per cent of white Londoners who use the bus at least once per week. Black Londoners using the bus at least once per week is significantly higher at 73 per cent<sup>11</sup>.
- 2.44 Mode split by ethnicity, based on LTDS 2019/20 analysis is shown in **Figure 2.22**.

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<sup>10</sup> <https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics>

<sup>11</sup> <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

Figure 2.22: Mode split by ethnicity



Source: LTDS 2019/20

2.45 Based on average travel modes to CoL from the 2019/20 LTDS data, Other Ethnic Groups are more likely to use public buses (29 per cent). Other Ethnic Groups are also more likely to drive (6 per cent). White people are more likely to cycle (8 per cent). Mixed Multiple Ethnic groups are much more likely to walk (71 per cent), while Black or Black British people and Asian or Asian British people are much more likely to use the underground or other rail modes (94 per cent and 66 per cent, respectively). Again, it should be noted that these percentages may not be precise due to low sample sizes.

## 3 Impact on Bank junction movements

### Introduction

- 3.1 This section outlines the overall impact on vehicular and pedestrian movements at Bank junction and the impact of the scenarios outlined below:
- Scenario 1: Buses, cycles, and taxis
  - Scenario 2: Buses, cycles and powered two wheelers (P2Ws)
  - Scenario 3: Buses, cycles, taxis and P2Ws
- 3.2 A fourth scenario, including “buses, cycles, and all motor traffic”, was initially considered and analysis of this was included in the February 2023 EqIA. However, following further analysis of this option, Committee decided not to take it any further. Therefore, it has been excluded from this update to the EqIA.
- 3.3 Consideration is given as to how the proposed design would impact movement for the following users:
- Pedestrians
  - Cyclists
  - Buses
  - Taxis (black cabs – Private Hire Vehicles such as Uber are classified as general motor traffic)
  - General motor traffic
- 3.4 In each scenario, it has been assumed that motor vehicles can access the same arms of the junction that buses and cycles can under the current scheme. These are Cornhill, King William Street/Lombard Street, Poultry and Princes Street.
- 3.5 To inform this impact assessment, the scenarios have been initially modelled within VISSIM by consultants Norman Rourke Pryme to test their potential impact on bus and general motor traffic journey times in accordance with the current stage of scheme design. A summary of this modelling is included within this chapter.
- 3.6 It should be noted that this initial modelling conducted by Norman Rourke Pryme relates to initial feasibility. The forecasted impacts are subject to change on refinement and finalisation of the proposals as more detail becomes available, and any mitigation measures introduced.

### Existing Bank junction layout

- 3.7 At present, there are restrictions for motor traffic (except buses) through Bank junction Monday to Friday, during the hours of 7am to 7pm:
- **Lombard Street/King William Street:** bus and cycle access only, Monday to Friday, 7am to 7pm.
  - **Poultry:** bus and cycle access only, Monday to Friday, 7am to 7pm. Taxis may access the new taxi rank outside the Ned hotel, but must U-turn during the restricted hours.

- **Princes Street:** (northbound) bus and cycle access only.
- **Princes Street:** (southbound) compulsory left turn into Cornhill at all times, except bus and cycles.
- **Cornhill:** (westbound) bus and cycle access only, Monday to Friday, 7am to 7pm.
- **Queen Victoria Street:** Only cycles can enter or exit onto Mansion House Street at all times.
- **Threadneedle Street:** cycle access only, at all times, between the junction and Bartholomew Lane

## Scenario 1: Buses, cycles, and taxis

### Pedestrians

- 3.8 Movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of taxis will increase the overall traffic through Bank junction which may make it more difficult for some people to informally cross the road.

### Cyclists

- 3.9 As with pedestrians, cyclists would not have any restrictions imposed on their movements. However, the introduction of taxis will increase the overall traffic through Bank junction which may reduce real or perceived road safety.

### Buses

- 3.10 In Scenario 1, wherein only buses, cycles and licensed taxis would be permitted through Bank junction, several bus routes would experience notable increases in their AM and PM peak journey times.
- 3.11 Southbound routes will experience small increases in the AM peak and more substantial increases in the PM peak. The northbound routes would experience journey time increases in the PM peak only.
- 3.12 The above results show that taxis passing through Bank junction will have a moderately negative impact on bus journey times for specific services travelling along Princes Street and King William Street.

### Taxis

- 3.13 Under the current scenario taxis can collect and drop off passengers on all arms of Bank junction, however, cannot drive through the junction during 7am-7pm Monday to Friday. This could mean some taxis are less likely to travel into the Bank junction area to ply for hire.
- 3.14 In Scenario 1, taxis would be able to more easily pick up and drop off passengers in and around Bank junction and would be able to ply for hire more easily around and within the junction.

### General motor traffic

- 3.15 General motor traffic would not be allowed through Bank junction in this scenario.
- 3.16 Modelling outputs shows that in both the AM and PM peak hours, most general traffic journey times along the alternative key routes are negligible compared to the baseline situation. There is generally a slight improvement in journey times due to some taxis being removed from routes around Bank junction and reassigning to pass through Bank junction.

## Scenario 2: Buses, cycles, and P2Ws

### Pedestrians

- 3.17 Movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of P2Ws will increase the overall traffic through Bank junction which may make it more difficult for some people to informally cross the road and therefore may reduce real or perceived road safety.

### Cyclists

- 3.18 As with pedestrians, cyclists would not have any restrictions imposed on their movements. However, the introduction of P2Ws will increase the overall traffic through Bank junction which may reduce real or perceived road safety.

### Buses

- 3.19 In Scenario 2, all bus routes would experience negligible changes to their AM and PM peak journey times. The impact of powered two wheelers on bus journey times therefore is unlikely to be significant.

### Taxis

- 3.20 In Scenario 2, there would be no change from the current restrictions experienced by taxis. They would continue to be able to collect and drop off passengers on all arms of Bank junction, however they cannot drive through the junction during 7am-7pm Monday to Friday, and therefore, some taxis are less likely to travel into the Bank junction area to ply for hire.

### General motor traffic

- 3.21 The changes to the general traffic journey times for Scenario 2 are mostly negligible. This is because the impact of motorcycles on the highway network tends to not be significant due to their ability to move between vehicles and bypass queues. They also take up less space on the road than a car or larger vehicles.

## Scenario 3: Buses, cycles, taxis, and P2Ws

### Pedestrians

- 3.22 In Scenario 3, the movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of taxis and P2Ws will further increase the overall traffic through Bank junction which is likely to make it more difficult for some people to informally cross the road.
- 3.23 This scenario is likely to decrease real or perceived road safety for pedestrians due to the increased access and likely increase in traffic volume.

### Cyclists

- 3.24 In Scenario 3, cyclists would not have any restrictions imposed on their movements. However, the introduction of taxis and P2Ws will increase the overall traffic through Bank junction which may reduce real or perceived road safety.
- 3.25 This scenario is likely to have a more significant impact on real or perceived road safety for cyclists due to the increased access and likely increase in traffic volume.

### **Buses**

- 3.26 In Scenario 3, a similar pattern of results to Scenario 1 emerges. Southbound bus routes all experience a relatively large journey time increases in the AM peak, with this exacerbated in the PM peak. Journey times are increased slightly further from Scenario 1 due to the addition of powered two wheelers passing through Bank junction.
- 3.27 Some northbound routes would have reduced journey times in the AM peak, which is likely due to some congestion along its route being alleviated by the re-routing of traffic through Bank junction.

### **Taxis**

- 3.28 Under the current scenario taxis can collect and drop off passengers on all arms of Bank junction, however, cannot drive through the junction during 7am-7pm Monday to Friday. In Scenario 3, taxis would be able to more easily pick up and drop off passengers around Bank junction and would be able to ply for hire more easily around the junction.

### **General motor traffic**

- 3.29 The results for Scenario 3 are very similar to Scenario 1. This shows that the impact of powered two wheelers and taxis passing through Bank junction do not have a significant impact on journey times for general traffic.



## 4 Impacts on equality

### Introduction

- 4.1 This chapter considers the equality impacts of the potential change to traffic restrictions through Bank junction, and their potential to have disproportionate impact(s) upon equalities – both positive and negative. Recommended mitigations are also provided for any potential disproportionately negative impacts.
- 4.2 Where taxis are discussed, for the purposes of assessing the demographics of drivers, a distinction is made between taxis (black cabs) and Private Hire Vehicles (PHVs). Taxis would be permitted to drive through Bank junction in Scenarios 1 and 3 between 7am to 7pm.

### Age

#### Context

- 4.3 According to the Kings College London 2016 report “An Age Friendly City – how far has London come?”<sup>12</sup>, there is significant crossover between older Londoners and disabled Londoners. For example, almost half of those aged 65-69 report having a physical disability (46 per cent). Therefore, mobility issues in accessing public transport are likely to be particularly relevant for those aged 60+.
- 4.4 Young people are most likely to either walk or use the bus, in part because these are generally lower cost modes than the London Underground. The Greater London Authority (GLA)’s ‘Equality, diversity and inclusion evidence base for London’ 2019 report<sup>13</sup> shows that 49 per cent of 16-24-year-old Londoners cite cost of tickets as a barrier to using public transport more often, compared to less than 10 per cent of those aged 65+.
- 4.5 This may also be reflected in the demographics of those cycling within London. According to the GLA’s report, younger people are the most likely to cycle. A 2016 TfL survey showed that 82 per cent of Londoners who cycled in the past year were under the age of 45, with just 18 per cent over 45. Reducing the volumes of motor traffic will improve conditions for cycling, benefitting young people.

#### Impact assessment

- 4.6 **Road safety:** Scenario 3 reduces road safety benefits which pedestrians and cyclists have experienced under existing restrictions, as increasing these scenarios would increase the number of motor vehicles moving through the junction. This is likely to disproportionately impact those aged 65+, as a third of trips made by this age group are by walking (higher than

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<sup>12</sup> [https://www.london.gov.uk/sites/default/files/an\\_age\\_friendly\\_city\\_report.pdf](https://www.london.gov.uk/sites/default/files/an_age_friendly_city_report.pdf)

<sup>13</sup> [Equality, Diversity and Inclusion Evidence Base for London - London Datastore](#)

for any other age group) and those aged 60+ also have a higher-than-average likelihood of being killed or seriously injured if involved in a collision within CoL.

- 4.7 **Walking and cycling:** According to LTDS 2019/20 data for CoL, the proportion of trips made by the 65+ age group in CoL by walking (25 per cent) and cycling (8 per cent) outweighs the proportion using private cars (4 per cent). 32 per cent of younger people aged 16-24 travel to CoL by walking. Therefore, Scenario 3 is likely to negatively impact both older and younger people who primarily walk and cycle, as increases in volumes of motor traffic is likely to have an impact on real or perceived road safety.
- 4.8 **Air quality:** People of young and old age are more vulnerable to poor air quality<sup>14</sup>. For young children negative air quality can lead to reduced lung development and for the elderly this can lead to a range of long-term health problems. Therefore Scenario 3, which would increase the volumes of motor traffic through Bank junction is likely to disproportionately negatively impact these age groups through the resulting likely decreased air quality.
- 4.9 **Driving:** 11 per cent of people aged 65 to 75 living in CoL drive a car or van to work, based on 2011 Census data. No scenario listed would allow access to general motor traffic, and therefore this may disproportionately impact those who rely on this mode, prohibiting them to pass through Bank junction where they previously may have taken a direct route.
- 4.10 All three scenarios would increase the number of vehicles through Bank junction and would subsequently disbenefit younger people. This is because increased volumes of motor traffic may have real or perceived road safety for pedestrians and cyclists. This is likely to be most pronounced in Scenario 3, as permitting general motor traffic could result in a higher number of vehicles travelling via Bank junction.
- 4.11 **Public transport:** As outlined in the **Technical Note: Analysis of Additional Datasets**, ‘Freedom Pass Elderly’ Oyster Card types have the second highest proportion of usage throughout the day, for journeys that start at bus stops in the Bank junction area. Use of this ticket type is highest (9.9 per cent) during the interpeak time (10:00 – 16:00). LTDS 2019/20 data highlights that 15 per cent of people aged 60 and over travel by bus in CoL. Therefore, Scenario 3 is likely to negatively impact older people who use public transport, as increased volumes of motor traffic would have a direct impact on bus journey times.
- 4.12 In addition, TfL research from 2019 shows that bus-use is the next most commonly used transport type for younger Londoners (after walking and cycling). Among Londoners aged 11-15, 75 per cent use the bus at least once a week, compared with 59 per cent of all Londoners. Therefore, Scenario 1 and particularly Scenario 3 would be likely to negatively impact younger people who use public transport, as increased volumes of motor traffic would have a direct impact on bus journey times.
- 4.13 **Taxi drivers:** Taxi and PHV demographic statistics from December 2022 show that 17 per cent of PHV drivers in London are over the age of 55 and 50 per cent are under the age of 46. 41 per cent of licensed taxi drivers over the age of 57 and 21 per cent are under the age of 48<sup>15</sup>. Scenarios 1 and 3 would provide access to Bank junction for licensed taxis but not PHVs,

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<sup>14</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_city\\_of\\_london.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf)

<sup>15</sup> Age bands are not the same between the two groups.

therefore that the benefits of accessing Bank junction would not be extended to the disproportionately younger drivers of PHVs.

- 4.14 **Taxi usage:** All licensed taxis are required to be fully wheelchair accessible and obliged to carry any person who may require mobility assistance (without additional charge)<sup>16</sup>. Scenarios 1 and 3 would allow taxis to pass through Bank junction during 7am to 7pm which is likely to benefit older people who rely on taxis as an essential method of transport. This can be especially beneficial for time-sensitive trips, such as attending medical appointments, which are more common for disabled people, older people, and pregnant women.

## Disability

### Context

- 4.15 As part of the design and public consultation and accessibility engagement period for the original All Change at Bank scheme, CoL worked alongside Transport for All (TfA). TfA are a pan-impairment disabled-led group that strives to increase access to transport across the UK.
- 4.16 TfA facilitated several meetings with disability groups and individuals with various levels of accessibility to discuss the proposals and provide comments for us to consider. Meetings took place with Royal National Institute of Blind People, Guide Dogs, Alzheimer’s Society and Wheels for Wellbeing. Individuals with varied accessibility needs took part in four workshops, including members of City of London Access Group and the Bank of England Disability Staff Network.
- 4.17 The concerns raised within the consultation survey regarding the need for taxi access for disabled people did not dominate the workshops discussion or responses, although there were questions relating to additional wheeling / walking distances that would result for the restrictions. The proposals were assessed through the CoL’s Street Accessibility Tool to help inform the detail design.
- 4.18 Focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey<sup>17</sup> shows that 65 per cent of disabled cyclists use their bike as a mobility aid, and 64 per cent found cycling easier than walking. Survey results also show that 31 per cent of disabled cyclists’ cycle for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.
- 4.19 Transport for All’s (TfA) ‘Pave the Way’ Report shows that walking is the primary mode of travel for blind and partially sighted people, who have reduced transport alternatives available to them. TfA’s research shows that nearly 90 per cent of blind and partially sighted respondents interviewed said that being able to make walking journeys independently, without a sighted guide was important or very important to them.

### Impact assessment

- 4.20 **Walking:** Walking is the second highest mode share (24 per cent) for people with a physical or mental disability who travel into the CoL. Scenarios that increase the volumes of motor traffic

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<sup>16</sup> In relation to Sections 165 and 164a of the [Equality Act 2010](#)

<sup>17</sup> Wheels for Wellbeing Annual Survey 2019: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf>

through Bank junction is likely to negatively impact disabled people that walk. This is because increased vehicle movements may impact real or perceived road safety.

- 4.21 **Taxi usage:** All licensed taxis are required to be fully wheelchair accessible and obliged to carry any disabled person who may require mobility assistance (without additional charge)<sup>18</sup>. Scenarios 1 and 3 would allow taxis to pass through Bank junction during 7am to 7pm which is likely to benefit disabled people who rely on taxis as an essential method of transport. This can be especially beneficial for time-sensitive trips, such as attending medical appointments, which are more common for disabled people, older people, and pregnant women.
- 4.22 In the February 2023 EqIA, it was suggested that this may result in more direct journeys and shorter journey times for some trips and could decrease the cost associated with those trips for the user as a result. As outlined in the **Technical Note: Analysis of Additional Datasets**, cost and journey time benefits are varied, and depend on the passenger origin and destination. This is because only some routes that travel via Bank junction have cost and/or time savings in comparison to the second most direct route. Depending on passenger origin and destination, routes that avoid Bank may instead provide cost or journey time savings. In addition, it should also be noted that, in Scenarios 1 and 3, the likely increased volumes of traffic using the Bank junction area may limit any positive impact.
- 4.23 In the February 2023 EqIA it was considered that in Scenarios 1 and 3, where taxi access is permitted through Bank junction, there was likely to be an increased circulation of taxis in the area, and therefore increased likelihood of accessing taxis (reduced wait times) for those who rely on taxis as a mobility aid. The greater circulation and visibility of taxis is likely to also limit walking distances for those hailing taxis in the area. However, as outlined in the **Technical Note: Analysis of Additional Datasets**, taxi availability in the Bank area under the motor restrictions currently in place is proportionate and comparable to the wider trends in taxi availability across CoL, and across London. As such, it can be considered that this potential impact may not be experienced in a disproportionate way.
- 4.24 **Personal assistants:** Disabled people may rely upon family members, friends or professional assistants for daily care. The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5 per cent of the population<sup>19</sup>. It is likely that some personal assistants travel to, or via Bank junction. No data is available on the mode share of personal assistants; however, it is unlikely that this varies significantly from the method of travel to the CoL for all purposes, which is currently 1 per cent driving in a car or van. Scenarios which permit access to general motor vehicle in the area would facilitate access for personal assistants who visit the area in a private car. However, Scenarios 1 and 3 may negatively impact personal assistants who travel via public transport, due to increased bus journey times. Personal assistants who walk or cycle through Bank junction as part of their trip would also likely experience negative impacts on real or perceived road safety, as motor traffic volumes would be higher.

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<sup>18</sup> In relation to Sections 165 and 164a of the [Equality Act 2010](#)

<sup>19</sup> <https://statics.teams.cdn.office.net/evergreen-assets/safelinks/1/atp-safelinks.html>

- 4.25 **Cycling:** The Wheels for Wellbeing annual survey (2019/20)<sup>20</sup> showed that 65 per cent of disabled cyclists use their cycle as a mobility aid, and 64 per cent found cycling easier than walking. Survey results also show that 31 per cent of disabled cyclists' cycle for work or to commute to work and many found that cycling improves their mental and physical health. All scenarios increase access for vehicle traffic to some extent, but Scenario 3 in particular would see large increases in vehicle access and potentially impact on real or perceived road safety for those that rely on cycling as a mobility aid.

## Pregnancy and maternity

### Context

- 4.26 In 2021, the General Fertility Rate (GFR) in City of London and Hackney<sup>21</sup> was 54.1 births per 1,000 women aged 15-44, while the GFR for London was 56 per 1,000 women. This suggests that slightly fewer women of this age group were likely to be pregnant or have given birth in 2021 in CoL and Hackney, compared to the Greater London average.
- 4.27 Data shows that overall, the number of live births has been gradually falling in City of London and Hackney, and in London as a whole. During this time, the GFR for City of London and Hackney remained consistently below the Greater London average. In 2018, there was a slight increase in the fertility rate in CoL, before continuing to fall, yet it remained below the Greater London rate<sup>22</sup>.
- 4.28 Pregnant and maternal women are more likely to face mobility issues when using public and active modes of transport, whether because of the need to use a buggy and move it around or because of the need to safely manage a young child.

### Impact assessment

- 4.29 **Road safety:** Each scenario increases the volume of through-traffic compared to the existing situation, and this may increase the likelihood of conflict between different road users on the whole. This is relevant to Scenario 3, which allow the highest volumes of motor traffic through the junction. This may create a less safe environment, particularly for pregnant women who may have slower movement associated with their physical condition, particularly in the later stages of pregnancy.
- 4.30 **Air quality:** There is growing evidence showing that prenatal exposure to air pollution is associated with a number of adverse outcomes in pregnancy<sup>23</sup>. Therefore, in a scenario that would increase volumes of motor traffic (Scenario 3 in particular), an increase in emissions locally may disproportionately negatively impact pregnant women.

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<sup>20</sup> <https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf>

<sup>21</sup> City of London has been grouped with Hackney after 2004 in the dataset: [Births and Fertility Rates, Borough - London Datastore](#)

<sup>22</sup> City of London has been grouped with Hackney after 2004 in the dataset: [Births and Fertility Rates, Borough - London Datastore](#)

<sup>23</sup> [https://www.london.gov.uk/sites/default/files/air\\_quality\\_for\\_public\\_health\\_professionals\\_-\\_city\\_of\\_london.pdf](https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf)

- 4.31 **Taxis:** Licensed taxis provide a fully accessible service, which is likely to be particularly beneficial to pregnant women, especially at later stages of pregnancy. Scenarios 1 and 3 would increase access to taxis to Bank junction which is likely to benefit those pregnant women who rely on taxis as an essential method of transport.
- 4.32 Similarly, pregnant women who rely on taxis as an essential mobility aid in Scenarios 1 and 3 will be able to pass through Bank junction on their journeys within or through CoL. In the February 2023 EqIA, it was suggested that this may result in more direct journeys and shorter journey times for some trips and could decrease the cost associated with those trips for the user as a result.
- 4.33 As outlined in the **Technical Note: Analysis of Additional Datasets**, this benefit is only experienced depending on the passenger origin and destination. This is because only some routes that travel via Bank junction have cost and/or time savings in comparison to the second most direct route. Depending on passenger origin and destination, routes that avoid Bank may instead cost or journey time savings. In addition, it should also be noted that, in Scenarios 1 and 3, the likely increased traffic flows through the Bank junction area and the impact on general traffic journey times may limit this positive impact.
- 4.34 In the February 2023 EqIA it was also suggested that where taxi access is permitted through Bank junction, there is likely to be an increased circulation of taxis in the area and therefore increased likelihood of accessing (reduced wait times) for those who rely on taxis as a mobility aid. The greater circulation may also limit potential walking distances when using taxis in the area. As outlined in the **Technical Note: Analysis of Additional Datasets**, taxi availability in the Bank area under the motor restrictions currently in place is proportionate and comparable to the wider trends in taxi availability across CoL, and across London. As such, it can be considered that this potential impact may not be experienced in a disproportionate way by these road users.
- 4.35 **Walking and cycling:** There is limited research related to the extent to which pregnant women continue to walk or cycle as their pregnancy progresses, and the extent to which pregnant women use active travel in CoL is unknown. However, studies from wider contexts indicate that some women who used active travel pre-pregnancy continue to use active travel during pregnancy<sup>24,25</sup>. Therefore, Scenario 3 would reduce road safety benefits which pregnant pedestrians and cyclists have experienced under existing restrictions, as increasing these scenarios would increase the volumes of motor traffic moving through the junction.
- 4.36 **Public transport:** It is likely that some pregnant women either working, residing, or travelling through CoL will also continue to use public transport, however the extent to which this occurs within CoL is also unknown. Scenario 3, which would lead to the largest increase in volumes of motor traffic could disproportionately negatively affect pregnant women by any associated increases in bus journey times, as longer journey times may exacerbate the negative physical and mental symptoms of pregnancy<sup>26</sup>.

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<sup>24</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4730776/>

<sup>25</sup> <https://www.sciencedirect.com/science/article/abs/pii/S2214140516303814>

<sup>26</sup> <https://www.sciencedirect.com/science/article/abs/pii/S2214140521003388>

## Race

### Context

- 4.37 TfL data for Greater London shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65 per cent compared with 56 per cent of white Londoners who use the bus at least once per week. Black Londoners using the bus at least once per week is significantly higher at 73 per cent<sup>27</sup>.
- 4.38 The cost of transport is a particular barrier to increased public transport use amongst BAME Londoners with 60 per cent of BAME Londoners saying costs is a barrier compared to 38 per cent of white Londoners<sup>28</sup>. Therefore, changes which help to make transport more affordable or offer improvements to low-cost modes of transport such as walking and cycling may benefit users who identify as being of BAME groups.

### Impact assessment

- 4.39 **Cycling:** All scenarios would increase motor vehicle traffic through the Bank junction area, and this is likely to impact upon real or perceived safety for those groups who have the highest cycling mode share, namely Mixed or Multiple Ethnic Groups. This is most applicable to Scenario 3, which would see the largest increases in volumes of motor traffic. This may also discourage cycling in ethnic groups that are currently less likely to cycle due to the real or perceived safety of cycling alongside motor traffic.
- 4.40 **Public transport:** BAME groups who have a higher mode share for bus usage, are likely to be disproportionately negatively affected by any increases in bus journey times, particularly in Scenario 3, which would see the largest increase in volumes of motor traffic.
- 4.41 **Taxi drivers:** Taxi and PHV demographic statistics from December 2022 show that 38 per cent of PHV drivers in London are Asian or Asian British and 15 per cent are Black or Black British (and 32 per cent declined to answer). 64 per cent of licensed taxi drivers are White British (and 17 per cent declined to answer). Scenarios 1 and 2, that permit access through Bank junction for licensed taxis and not PHVs would mean that BAME groups disproportionately miss out on the associated benefits extended to taxi drivers.

### Summary

- 4.42 A summary of the disproportionate positive and negative impacts identified on protected groups is set out by scenario below:

#### Scenario 1: Buses, cycles, and taxis

- 4.43 Scenario 1 is likely to have the least negative impact on equalities compared to the other scenarios. The biggest positive impact is due to the access provided to taxis to pass through the junction. This would benefit those who may rely on taxi access, such as older people, those with mobility impairments and pregnant women.
- 4.44 By only extending access to taxis, this would also limit the impact on public transport and cyclists. However, the inclusion of taxi access will still have direct impacts on public transport,

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<sup>27</sup> <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>28</sup> GLA Intelligence – Equality, Diversity and Inclusion Evidence Base for London

active transport, and road safety, though to a lesser extent than some other scenarios with greater increases in vehicle access.

**Scenario 2: Buses, cycles and P2Ws**

- 4.45 Scenario 2 is likely to have limited impact on equalities, the inclusion of P2Ws is unlikely to have a major impact upon traffic or congestion. The continued restriction to most motor traffic from the junction is likely to retain the benefits for road safety and air quality, disproportionately benefitting younger and older people, disabled people, and pregnant women.

**Scenario 3: Buses, cycles, taxis and P2Ws**

- 4.46 Scenario 3 provides greater access to motor vehicles and therefore increases the impacts on equalities. Like Scenario 1, the biggest impact is due to taxi access. This will benefit those who may rely on taxi access, such as older people, those with mobility impairments and pregnant women.
- 4.47 Conversely, the greater access for vehicles will see greater negative impact upon road safety and air quality, impacting younger and older people, disabled people, and pregnant women.



## 5 Summary and conclusion from analysis of additional data

### Summary

- 5.1 The February 2023 EqIA recommended that additional research was undertaken in order to establish the implications that the All Change at Bank scheme has had on taxi availability within the Bank junction area, and therefore the associated impact(s) experienced by people who share one or more protected characteristics.
- 5.2 This data has since been collected, alongside data to determine taxi journey times and associated costs as a result of avoiding routeing via Bank junction. This data has been analysed in relation to equality impacts and is explored in **Technical Note: Analysis of Additional Datasets**. A summary of these findings is outlined below:
- **Taxi availability:** There has been a decrease in taxi availability in the Bank junction area in comparison to previous years, which can make it more difficult to hail a taxi on the streets leading to Bank junction. However, the scale of the reduction is not unique to the Bank junction area, as the wider CoL and comparative locations have experienced a similar scale of change. Therefore, while people who rely on taxis as an essential mobility aid may find it harder to hail a taxi around Bank junction, is proportionate and comparable to the wider trends in taxi availability across the CoL and London.
  - **Taxi and private hire wait times for ride hailing apps:** Wait times for taxis and PHVs that are requested via ride hailing apps are slightly higher in Bank junction. The average wait time for a taxi at Bank was 4 minutes and 11 seconds, in comparison to an average of 4 minutes and 1 second for CoL. This is not considered to be significant.
  - **Taxi journey times:** The results showed that the Bank restrictions do not appear to have a significant impact on journey time. Out of eight journey time routes analysed, routes via Bank junction produced the quickest journey on two occasions. This means that not all taxi journeys are being (directly) negatively impacted by the restrictions, and some are benefiting from them.
  - **Taxi journey costs:** When all journeys were compared, taxi trips via Bank junction were £0.68 more expensive on average than those which avoided Bank junction. Some routes/journeys however were up to £4.03 more expensive, others were up to £2.23 cheaper.
- 5.3 In response to concerns that a lack of passive surveillance from passing motor vehicles has negatively impacted crime trends within the Bank junction area, crime data has also been assessed in **Technical Note: Analysis of Additional Datasets**. This analysis indicates that fluctuations in crime rates observed in and around Bank junction are proportional to trends across the CoL, suggesting that there has been no significant increase in crime compared to surrounding areas since the All Change at Bank scheme was implemented.

## Conclusion

- 5.4 **The additional research undertaken on taxi availability, journey times, and journey costs suggests that, as a whole, the restriction of taxi access through Bank junction between the hours of 7am to 7pm has not led to any extensive negative impacts on equality, and the impacts of the restrictions outside of these hours is deemed to be negligible. However, it is important to acknowledge that there have been some negative impacts for certain individuals, particularly those that are most reliant on taxis as an essential mobility aid, such as some disabled people, older people with age-related mobility impairments, and pregnant women.**
- 5.5 The primary negative impact with the current traffic restrictions are the increases in journey time for some taxi users. Though taxis can serve every address at and around Bank junction at all hours of the day, for some taxi passengers, taxi journeys during restricted hours could now be longer and cost more, depending on trip origin, destination, and alternative route used. The severity of this negative impact is nuanced and varies between relatively minor and relatively substantial. The additional study of taxi journeys showed that not all journeys via taxi or private hire vehicle are being negatively impacted, and some routes which avoid Bank junction are now quicker than if they passed directly through it.
- 5.6 Ultimately, these negative impacts must be taken in context. Taxi journeys comprise approximately 1 per cent of all journeys to the CoL (for all purposes), and less than 1 per cent for people who travel to work in the CoL. Further consideration should also be given to the benefits that the current motor traffic restrictions deliver for all users, including disabled people, older people, and pregnant women. This includes the improvements to perceived and actual road safety, as well a less polluted space. Amending these restrictions to allow additional motor traffic through Bank junction would risk compromising these benefits to some extent, affecting everyone.
- 5.7 Scenario modelling also demonstrates that permitting taxis through Bank junction would also have a negative impact on bus journey times. Bus mode share is five times higher for journeys travelling into the CoL than taxis, meaning that significantly more people use the bus to access Bank junction. Permitting taxis through Bank junction could risk negatively impacting journeys for a greater number of people, including public transport users who are disabled, older, or pregnant.
- 5.8 If any change is made to the existing traffic restrictions at Bank junction, it is recommended this change is implemented on an experimental basis, and that the CoL continues to monitor the scheme's impact through their existing monitoring and evaluation framework. This will provide scope to review the impact of the restrictions on equality, and potentially make amendments to the scheme if the impacts are deemed to be extensive and disproportionate. Furthermore, where possible, engagement with affected taxi users (who rely on taxis as an essential mobility option) through existing channels of communication would allow CoL to gain a deeper understanding of the specific challenges taxi users face and tailor any potential amendments to better address their needs.

# A Technical Note: Analysis of Additional Datasets

# All Change at Bank EqIA

## Technical Note: Analysis of Additional Datasets

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# All Change at Bank EqIA Technical Note: Analysis of Additional Datasets

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# 1 Introduction

## Background

- 1.1 This Technical Note presents analysis which supports the update to the All Change at Bank Equality Impact Assessment (EqIA), produced in February 2023. The February 2023 update to the All Change at Bank EqIA concluded that additional research should be carried out to further understand the potential impacts of restricting taxi access for people who rely upon taxis as essential mobility. Specifically, the February 2023 EqIA recommended a taxi availability survey to better understand the availability of taxis within the area around Bank junction and the associated impact this may have on people who rely upon them as an essential mobility aid. Following this recommendation, additional equality datasets have been created in relation to taxi circulation.
- 1.2 This Technical Note presents the analysis that has been undertaken on these datasets and also presents further research and literature review in relation to additional equality topics that have been raised in relation to taxi restrictions since February 2023.
- 1.3 The analysis included in this Technical Note includes:
  - **Section 2: A review of comments received by local lobby group “Cabs Across Bank”:** to establish equalities-related concerns that have been raised by taxi passengers and drivers.
  - **Section 3: Literature review:** to identify the potential implications of taxi restrictions for protected characteristic groups and people within lower socio-economic status.
  - **Section 4: Review of changes in taxi availability and taxi journey time data:** to assess the equality implications related to changes in taxi journey times and routes pre-and-post scheme restrictions.
  - **Section 5: Crime data analysis:** to examine changes in crime trends since the introduction of restrictions at Bank junction, and whether changes are disproportionate.
  - **Section 6: Review of Oyster Card data:** for bus stops around the Bank junction area to determine bus user profile, and subsequent equality considerations.
- 1.4 Analysis of these additional datasets has supported the update of the main EqIA.

## 2 Comments received by Cabs Across Bank

### Background

- 2.1 Cabs Across Bank is a group which is campaigning for Licensed Hackney Carriages to retain access across Bank Junction and other streets in CoL which feature restrictions for motor vehicles. As part of their campaign, Cabs Across Bank have received comments from taxi drivers and passengers regarding their experience of taxi access and operations in CoL.
- 2.2 Comments received by Cabs Across Bank have been reviewed in relation to equality impact themes, which has informed the analysis of additional datasets.

### Methodology

- 2.3 Approximately 200 responses from taxi drivers and passengers have been reviewed, though this does not comprise the total responses that have been received by Cabs Across Bank. Cabs Across Bank disclosed that, by 25 February 2024, they had received 589 comments from taxi passengers and taxi drivers.
- 2.4 Cabs Across Bank sifted these responses prior to sharing them and excluded similar responses from the dataset. As such, this analysis comprises a review of equality related themes raised within the responses only and does not indicate frequency of concerns raised by respondents.
- 2.5 Comments analysed were recorded as being sent to Cabs Across Bank from 27 September 2023 – 25 February 2024.

### Analysis

- 2.6 **Table 2.1** presents the analysis of comments received from Cabs Across Bank. Responses have been categorised into taxi-related themes and their associated comment type. Where responses have indicated a potential impact on a specific characteristic group, these protected characteristics have been listed.

**Table 2.1: Themes raised by Cabs Across Bank respondents, and related equality implications**

Theme	Comment	Comment references specific Protected Characteristic Group
Taxi Use	Comment that people rely on taxis for essential mobility	<ul style="list-style-type: none"> <li>Age (older people)</li> <li>Disability</li> <li>Pregnancy and Maternity</li> <li>Sex</li> </ul>
Taxi Availability	Concern that there are fewer taxis available	<ul style="list-style-type: none"> <li>Disability</li> <li>Age (older people)</li> <li>Sex</li> </ul>

Theme	Comment	Comment references specific Protected Characteristic Group
Taxi Availability	Concern expressed about increased difficulty of 'getting around' due to restrictions, including to named locations/destinations	Sex Disability Age (older people)
Taxi Availability	Concern that there is a longer wait time to find a taxi	Sex
Taxi Routes	Concern that taxis are not being permitted to take the shortest routes	Disability Age (older people)
Taxi routes	Concern that people are being dropped further from their desired destination	Disability Age (older people) Sex
Taxi fares	Concern that restrictions are resulting in higher taxi fares	Disability
Safety	Concern that there is reduced safety due to taxis being restricted, e.g. walking in dark, decreased passive surveillance	Sex Age (older people) Disability

- 2.7 Relevant comments made by respondents indicate equality-related concerns in relation to four protected characteristic groups: Sex, Age (specifically older people), Disability, and Pregnancy and Maternity.
- 2.8 The themes of concerns raised include decreased taxi availability, increases in time for taxi journeys and longer routes, plus corresponding increases to taxi fares, and decreased safety as a result of less passive surveillance from vehicles. A more general concern that taxi use is relied upon for essential mobility across protected characteristic groups was also raised by respondents. The comments and themes listed above were raised in passenger responses and also by taxi drivers who frequently shared concerns on behalf of passengers. These themes will be considered within the following analysis and have also been considered within the update of the EqIA.

## 3 Literature Review

### Introduction

- 3.1 To inform the impact assessment, a review of relevant literature was undertaken to establish the various ways in which taxi availability and access can affect people with protected characteristics. This research involved reviewing academic papers, research studies, and demographic data to draw out the ways in which taxi availability could have disproportionate impacts of different groups of people.

### Methodology

- 3.2 Research was primarily undertaken in relation to the protected characteristic groups of age, disability and sex. Socio-economic status and occupation are not a protected characteristic within the Equality Act, however, research also considered these characteristics, as they have also been discussed in relation to taxi access restrictions within the All Change at Bank scheme.
- 3.3 Research focused on London-related materials, though where information was not available at this scale, information at a regional or national scale was reviewed. This allowed us to gain a broader perspective on the topic and identify wider trends, providing a more nuanced understanding of the topic.
- 3.4 Overall, this review has enabled us to identify the potential transferability of the findings to the All Change at Bank scheme context.

### Key findings

#### Disability

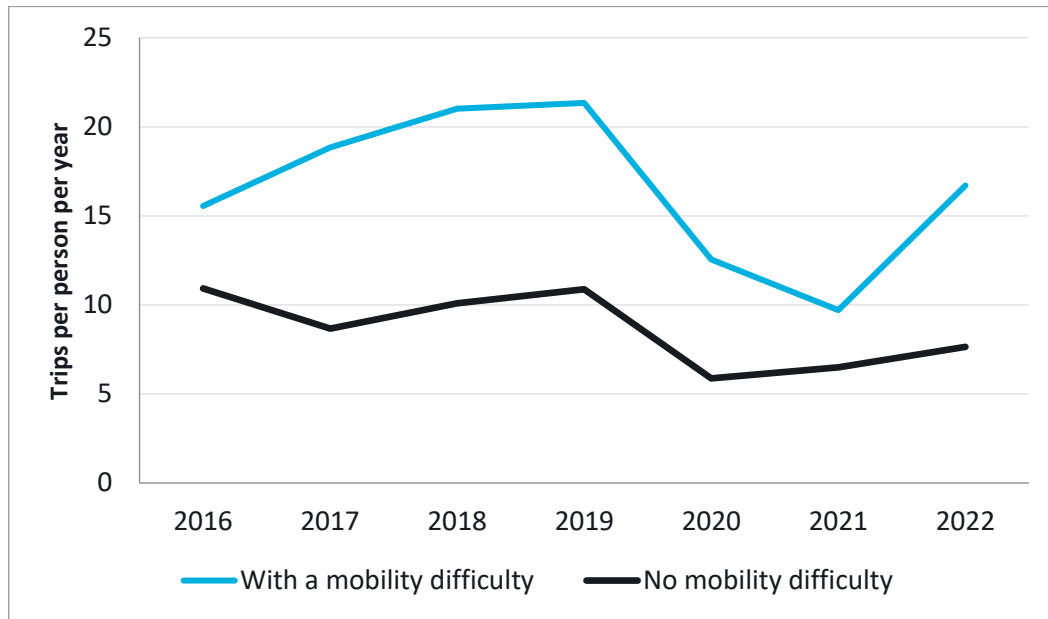
- 3.5 Transport for London's (TfL) EqIA evidence base for the Taxi (Black Cab) Fares and Tariffs Review 2022<sup>1</sup> outlined frequency of taxi use amongst disabled Londoners, Londoners who are wheelchair users, and non-disabled Londoners. Wheelchair users were found to be more likely to use a taxi at least once a week (6 per cent), than other disabled Londoners and non-disabled Londoners (both 3 per cent).
- 3.6 Distribution of taxi journeys by time band showed that two thirds of journeys (68.8 per cent) started during the daytime on weekdays. Within the 22:00-05:59 time frame, 7.2 per cent of journeys are taken Monday-Thursday, 2.1 per cent on Fridays, 1.5 per cent on Saturdays and 0.6 per cent on Sundays. As taxi journeys are more likely to be taken during the daytime, and because wheelchair users more regularly use taxis, daytime restrictions could subsequently impact a greater number of disabled users.

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<sup>1</sup> [Appendix 4 EQIA evidence base.pdf \(tfl.gov.uk\)](#)

3.7 In addition, National Travel Survey data from 2022 shows that disabled people generally make more than double the number of taxi trips each year than non-disabled people<sup>2</sup>.

Figure 3-1: Average number of taxi trips made per year, England, 2016 - 2023



Source: National Travel Survey 2022

3.8 This data indicates that disabled people are significantly more reliant on taxis as a method of transport. Subsequently, changes to the routes and availability of taxis may have a greater impact on disabled people, who are reliant on door-to-door taxi services.

**Socioeconomic status and occupation**

3.9 It should be noted that socio-economic status and occupation are characteristics which are not considered protected within the Equality Act and have not previously been considered within the EqIA. However, concerns about socio-economic status and occupation have been raised in relation to taxi access restrictions of the All Change at Bank scheme, in particular that those in the service and hospitality industry would be negatively impacted by a reduction in vehicles circulating. Literature review has not found evidence that service and hospitality workers rely on taxis for commuting journeys.

3.10 Data collected in 2023 by the Office of National Statistics analysed the method used to travel to work by occupation<sup>3</sup>. The data notes that zero observations were found within CoL that employed people working within ‘Caring, leisure and other service occupations’ used a taxi as their method of transport to work.

3.11 The most recent publication of Taxi and Private Hire Vehicle Statistics<sup>4</sup> (2023) utilised data from the 2021 National Travel Survey to determine personal travel patterns by residents of England. When analysing household income patterns, there were no clear trends in the

<sup>2</sup> [Average number of trips and miles by mobility status and mode, aged 16 and over: England, 2007 onwards, Office for National Statistics](#)

<sup>3</sup> [Method used to travel to work by occupation - Office for National Statistics](#)

<sup>4</sup> [Taxi and private hire vehicle statistics, England: 2023 - GOV.UK](#)

number of taxi or PHV trips taken and income levels, or with the distance travelled and income quintiles. This differs from the 2022 publication, which evidenced that people in lower income quintiles travel lesser distances via taxi than those in higher income quintiles: people in the bottom quintile travel 20 miles per person per year, compared to those in the highest income quintile travelling 32 miles.

- 3.12 However, Centre for London identified a relationship between income and type of transport used; people with lower incomes use buses more than those on higher incomes<sup>5</sup>. Centre for London determined that this is primarily because bus use is more accessible in terms of relative price to other modes, rather than being a deliberate choice. It is possible that bus journey times, reliability and passenger experience improves as a result of Bank traffic restrictions enabling a decrease in motor traffic and congestion. As such, this could produce a disproportionate positive impact for people on lower incomes, who are more likely to use buses.

#### **Age and sex**

- 3.13 As outlined in **Table 2.1**, concerns have been raised in relation to use of taxis by women and older people. Data from the 2021 National Travel Survey shows that in England, men took an average of 7 trips by taxi or PHV per year and women took an average of 6 trips by taxi or PHV per year<sup>6</sup>.
- 3.14 Despite the slight difference in number of taxi or PHV trips made by men and women, there was evidence of variation with age. National Travel Survey data from 2021 indicated that in England, women aged 17-30 took an average of 13 taxi/PHV trips per year, in comparison to men in the same age group, who took an average of 6 taxi/PHV trips per year. Women in England aged 21 – 29 also recorded a higher average of taxi/PHV trips per year than men in the same age group. The trend of a higher average of taxis/PHV trips per year by young women is a trend that has been reflected in the National Travel Survey data in recent years (see **Figure 3-2**).
- 3.15 However, in 2022, this historic trend reversed, with younger men in England taking more taxi/PHV trips on average per year than younger women, in comparison to previous years. Nevertheless, this data indicates that historically, younger women have taken more trips by taxi or PHV per year in comparison to young men. Taxi-related restrictions could subsequently impact younger women more than younger men. However, it should be considered that the overall average number of trips per year for both men and women are relatively small in comparison to the average number of overall trips a person may make per year. The subsequent effects of taxi-related restrictions could therefore be considered to be a minor impact.

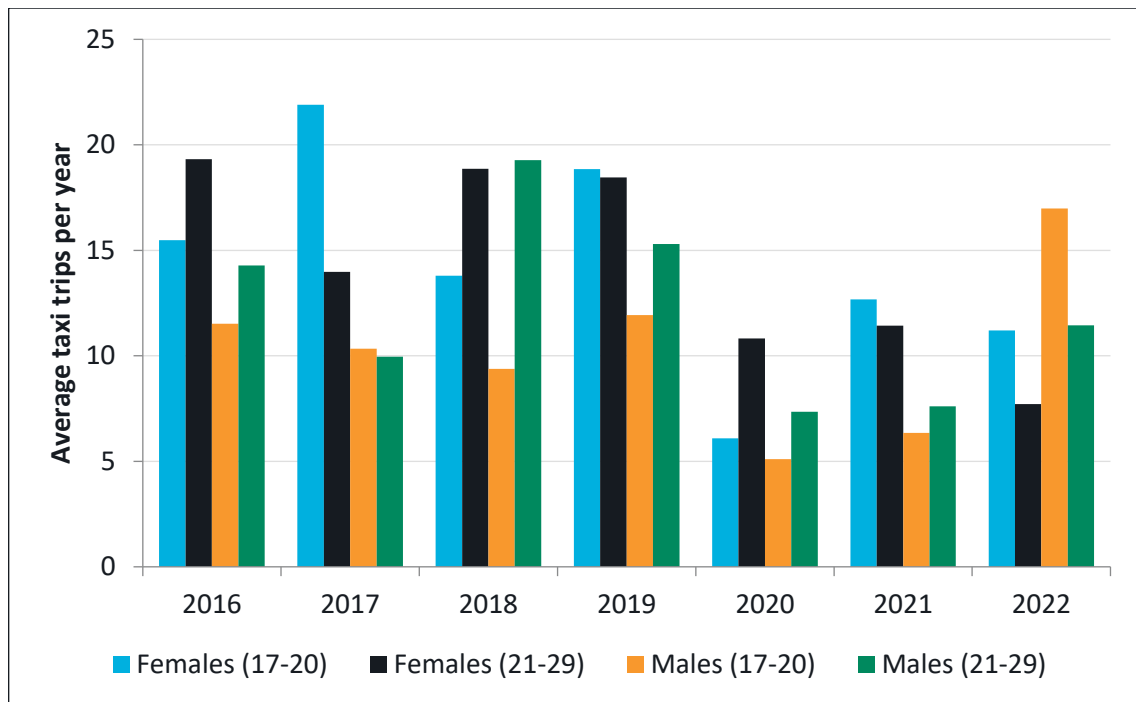
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<sup>5</sup> [Centre for London | What influences people's choice of mode of travel?](#)

<sup>6</sup> [Average number of trips, stages and distance travelled by sex, age and mode: England, 2002 onwards](#)



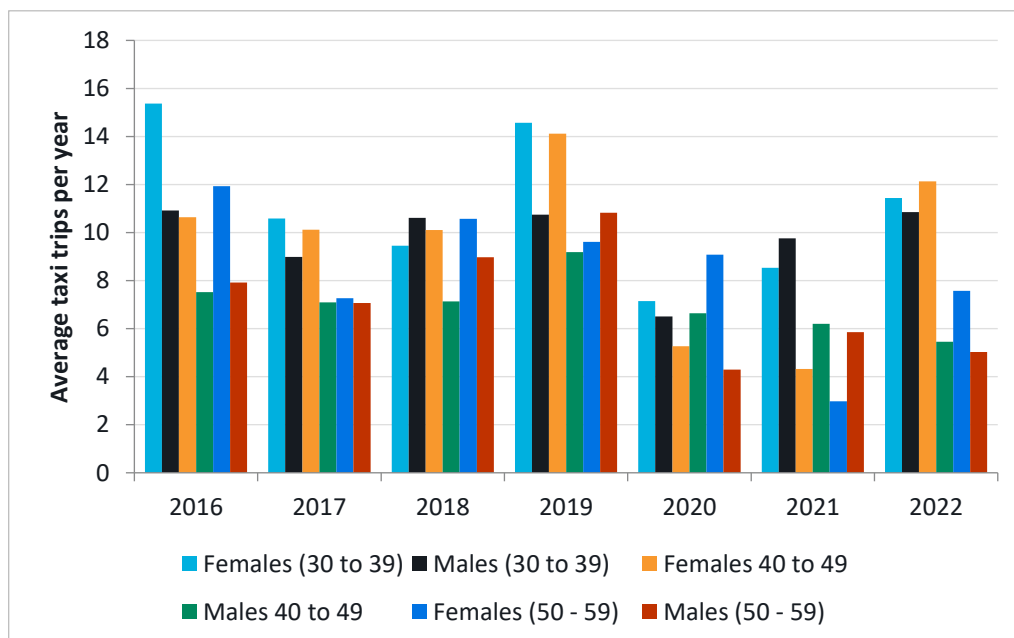
Figure 3-2: Average taxi trips made by younger people, by age group and by sex (2016 – 2022)



Source: National Travel Survey 2022

3.16 National Travel Survey data also shows a broad trend that between 2016 -2022, women in England aged 30 –39, 40 – 49 and 50 - 59 have generally made more trips per year on average by taxi in comparison to men in the same age categories (see **Figure 3-3**).

Figure 3-3: Average taxi trips made by younger people, by age group and by sex (2016 – 2022)

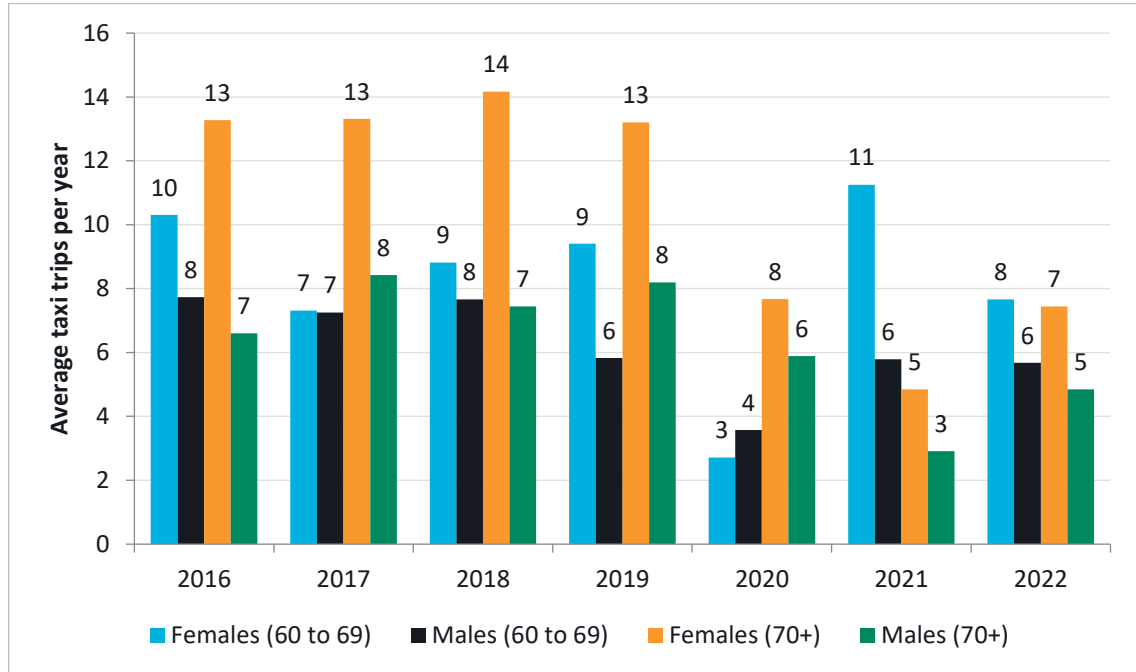


Source: National Travel Survey 2022

3.17 Similarly, for people aged 60 – 69, and 70+, women in England have historically made more trips by taxi per year than men in the same age categories. As shown in **Figure 3-4**, the average

number of taxi trips made per year by women aged 70+ has decreased since 2019. However, it should be considered that the overall average number of trips per year for both men and women are relatively small in comparison to the average number of overall trips a person may make per year. The subsequent effects of taxi-related restrictions could therefore be considered to be a minor impact.

Figure 3-4: Average taxi trips made by younger people, by older people, by age group and by sex (2016 – 2022)



# 4 Review of Bank Junction Availability Analysis Report

## Introduction

- 4.1 WSP was commissioned by CoL of London (CoL) to undertake analysis regarding:
- Taxi availability in the Bank junction area, including taxi counts and taxi rank usage
  - Wait and dwell times for taxis/PHVs.
  - Variation in taxi journey times for passengers, when comparing routes via Bank Junction; Bishopsgate, and the fastest route on a travel planning app.
- 4.2 This chapter analyses the data and highlights the key findings that are relevant for equality impacts.

## Taxi availability

- 4.3 30 ranks across CoL were surveyed to determine taxi availability. Seven ranks were within the Bank junction area, including Wood Street, Gresham Street, Cheapside, Princess Street, Cornhill, and Queen Victoria Street. The rest of CoL was divided into three sections (north, east, and west). Liverpool Street was assessed separately due to more concentrated taxi activity around the station.
- 4.4 A total of 2,002 taxis were recorded across the survey period. This included 135 taxi visits to the Bank junction area. The report indicated that the Bank junction area had fewer taxis. None of the Bank rank locations recorded more than 101 taxis: four recorded between 2-20 taxis, two recorded between 21-100 taxis and one recorded a single taxi visit. In comparison, all other sections recorded at least one site with 101+ taxis, suggesting that taxi rank usage is not concentrated at one rank within the Bank junction area.
- 4.5 The report also compared changes in taxi counts over time at comparative locations. These locations comprised Oxford Street and Regent Street (City of Westminster), alongside the “rest of the City”. This comparison illustrated that all locations had at least a 25 per cent decrease in taxi volumes from 2017 to 2022/23. Regent Street experienced the highest percentage change, with a 46 per cent reduction in taxi counts from 2017 to 2022/23. In contrast, the Bank area had a 41 per cent reduction in taxis. Furthermore, there has been a 30 per cent decrease in licensed taxis in London between 2016 and 2023; the average number of Licensed Taxis detected (April – June) was 11,396 in 2016 compared to 6,344 in 2023<sup>7</sup>.

## Implications for EqIA

- 4.6 Findings indicate that there has been a decrease in taxi availability in the Bank junction area, in comparison to previous years. However, the scale of the reduction is not unique to the Bank

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<sup>7</sup> [CCLEZ Online Fact Sheet \(tfl.gov.uk\)](https://www.tfl.gov.uk/roadworks/fact-sheets/cclez-online-fact-sheet)

junction area, as the wider City and comparative locations have experienced a similar scale of change.

- 4.7 The preceding literature review identified that it is more likely that disabled people – which may include older people with age-related mobility impairments - and young women are likely to make more trips via taxi or PHV. Subsequently, a decline in the number of taxis available could disproportionately impact these people who rely on taxis for essential mobility. This is because fewer taxis available could make accessing taxis more difficult for these passengers, due to fewer numbers of these vehicles being available.
- 4.8 However, the results of the taxi counts indicate that the number of taxis available in the Bank junction area is proportionate and comparable to the wider trends in taxi availability across CoL, and across London.

### **Wait Times**

- 4.9 WSP reported that average wait times for PHVs in the Bank area (including Free Now, Uber and Bolt) was 3 minutes and 33 seconds. This was 13 seconds above the average wait time recorded across the whole of CoL (3 minutes and 20 seconds). This indicates that there is not significant variation in wait times for PHV passengers.
- 4.10 The survey results similarly recorded that there was also little variation in taxi wait times (Free Now, Addison Lee and Bolt) in the Bank area in comparison to rest of CoL. However, across all locations surveyed, wait times for a taxi were longer in comparison to the wait time for a PHV. The average wait time for a taxi at Bank was 4 minutes and 11 seconds, in comparison to an average of 4 minutes and 1 second for CoL. The north study location recorded the highest wait time for a taxi, at 4 minutes at 28 seconds.
- 4.11 Though there was little variation in taxi and PHV wait times across CoL, Poultry and Cornhill were within the top three locations with the highest average taxi wait times across all sites surveyed. These sites are within the Bank junction area. As these locations are situated within the Bank area, longer than average wait times may exacerbate passenger perception of longer wait times within the whole Bank junction area.

### **Implications for EqIA**

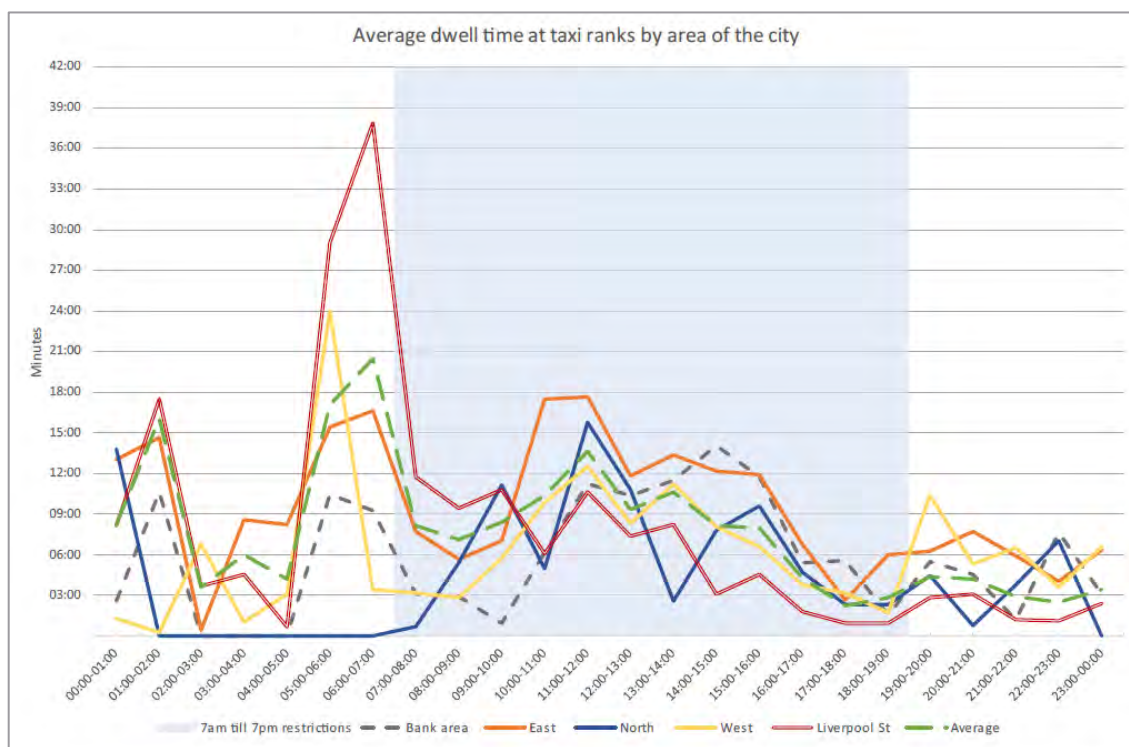
- 4.12 Longer wait times for taxis might be associated with greater physical discomfort for disabled people, older people with mobility impairments due to ageing, or pregnant women with acute mobility impairments. Longer wait times may also be associated with perception of safety during late night or early morning hours, which may impact some people more than others; particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment.
- 4.13 The analysis shows that the average wait time for taxis and PHVs in the Bank junction area is not significantly higher when compared to the rest of CoL (approximately +13 seconds for PHV users, and +10 seconds for taxi users). Overall, this difference in average wait time is not considered to disproportionately impact people with protected characteristics as identified above.

### **Dwell times**

- 4.14 Dwell times for taxis is the time between taxis dropping off passengers and picking up passengers/moving on. The taxi ranks in the Bank area recorded an average dwell time of 7

minutes and 53 seconds. When compared with the other areas of CoL, the Bank area had, on average, less dwelling time (average of 1 minute and 7 seconds less) than these other areas.

**Figure 4-1: Average dwell times at taxi ranks in CoL (2023)**



Source: Bank Junction Taxi Availability Analysis, WSP, 2023

4.15 Across both the Bank area and CoL, dwell times were highest between:

- 01:00 to 2:00
- 05:00 to 07:00, and
- 11:00 to 12:00

4.16 Across both the Bank area and CoL, dwell times were lowest between:

- 02:00 and 05:00 and
- 19:00 and 22:00.

4.17 To note, the top three taxi ranks with shortest average dwell times across all locations surveyed were located in the Bank junction area. These ranks were located at Princes St, Gresham St, and Cornhill. Dwell times at these locations were under one minute, which is a notable decrease in comparison to the dwell time average across Bank, and across the wider CoL.

**Implications for EqIA**

4.18 Decreased dwell time might indicate that taxis are moving on at greater pace from taxi ranks. Waiting for a taxi late at night can be a safety concern, particularly for women. Decreased dwell time during late night and early morning hours (02:00 – 05:00) could make it more difficult for prospective passengers to hail a ride on-site. This may affect the perception of

safety, which may impact some people more than others; particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment.

- 4.19 The rates and times at which dwell time decreases in the Bank area aligns with the patterns shown across the wider City, suggesting that, on average, Bank junction is not disproportionately impacted by lower dwell times. In addition, overall, Bank taxi ranks did not record a significantly lower average dwell time, in comparison to the rest of CoL. This suggests that there is not a disproportionate difference in dwell time between Bank and other areas within CoL.
- 4.20 However, additional surveying to monitor taxi and kerbside activity could be undertaken to understand why three ranks in the Bank junction area experienced the shortest average dwell times of all locations surveyed. This could provide greater understanding of whether there is a corresponding impact on the length of time people at these ranks need to wait before being able to hail an available taxi.

### **Journey time and cost comparison**

- 4.21 In order to assess the impact of the closure on journey times and related costs, four location pairs and the time it took to drive between them were assessed between 16:00 and 19:00, when motor vehicle restrictions are in place at Bank junction. The origin destination pairs were:
- Southwark Street to Silk Street (via London Bridge)
  - Whitechapel High Street to Blackfriars Station
  - Fenchurch Street Station to Giltspur Street
  - Liverpool Street to Queen Street
- 4.22 All origin destination pairs were allocated at least two routes for journey time surveying, with two pairs given a third route via Bishopsgate for additional data collection. Route options were:
1. Take the vehicle through Bank Junction (with temporary dispensation)
  2. Take the vehicle along Bishopsgate
  3. Take the vehicle along the fastest route that observes all relevant traffic restrictions in place between 7am and 7pm using the Waze app.

#### *Journey Times*

- 4.23 The results showed that the Bank restrictions do not appear to have a significant impact on journey time. Out of eight journey time routes analysed, routes via Bank produced the quickest journey on two occasions. These were:
- Southwark Street to Silk Street (northbound), 6 minutes faster than the slowest route, and a minute and half faster than the second-fastest route.
  - Whitechapel High Street to Blackfriars Station (eastbound), 6 minutes and 36 seconds quicker than the slowest route, and 2 minutes and 36 seconds quicker compared to the second-fastest route.
- 4.24 Travel via Bank was the second fastest route option for three other routes analysed. These were:
- Fenchurch Street Station to Giltspur Street (eastbound), one minute slower than route via Waze

- Fenchurch Street Station to Giltspur Street (westbound), four minutes slower than route via Waze
- Whitechapel High Street to Blackfriars Station (eastbound), approximately 10 seconds slower than the route via Waze.

4.25 Travel via Bank was the slowest route option for the remaining routes analysed. These were:

- Southwark Street to Silk Street (southbound), 2 minutes and 53 seconds slower than the fastest route via Waze
- Liverpool Street to Queen Street (westbound), 2 minutes and 45 seconds slower than the fastest route via Bishopsgate
- Liverpool Street to Queen Street (eastbound), slower than the fastest route by approximately 5.5 minutes.

### **Implications for EqIA**

4.26 For some disabled people, older people with age-related mobility impairments, or pregnant women, increases to journey time could cause greater discomfort during travel. In instances that routes via Bank were the quickest, the second-fastest routes were comparable to journey times via Bank as they were not significantly slower. This indicates that these routes present alternative options that are not likely to present severe corresponding impacts for passengers as a result of increased journey time.

4.27 This analysis further shows that most frequently, the quickest routes were via Waze, which instructed vehicles to find the quickest routes that observe the Bank junction restrictions. For these origins and destinations, this data indicates a minor positive impact for people in the protected characteristic groups outlined above, as minor improvements to journey times could make journeys more comfortable for these passengers.

4.28 It is recommended that there is ongoing analysis and monitoring in relation to how wider transport schemes and plans interact with motor vehicle restrictions at Bank. This is because changes along alternative routes which observe the Bank junction restrictions could result in longer journey times for taxis, and subsequently a more disproportionate negative impact, in comparison to the relatively small journey time differences currently observed.

### *Journey Costs*

4.29 WSP reported the corresponding journey costs associated with the routes taken for these journeys for the origin destination pairs listed above. The report presented evidence of increased costs on certain routes avoiding Bank junction.

4.30 Routes via Bank were cheapest for the following routes, when compared to the most expensive route option:

- Fenchurch Street Station to Giltspur Street (eastbound): £2.23 cheaper via Bank
- Whitechapel High Street to Blackfriars Station (eastbound): £0.48 cheaper via Bank
- Southwark Street to Silk Street (northbound): £1.73 cheaper via Bank

4.31 However, routes via Bank were also the most expensive for the following routes, when compared to the cheapest route option for:

- Southwark Street to Silk Street (southbound): £4.03 more expensive via Bank

- Fenchurch Street Station and Giltspur Street (westbound) £2.34 more expensive via Bank
- Liverpool Street to Queen Street (eastbound): £1.65 more expensive via Bank
- Liverpool Street to Queen Street (westbound): £3.21 more expensive via Bank

4.32 When all journeys were compared, and using the approximate journey costs presented in the WSP report, routes via Bank were £0.68 more expensive on average than those not via Bank.

#### **Implications for EqIA**

4.33 As identified in the literature review, disabled people are more likely to make journeys via taxi. In addition, Increased costs are particularly significant to disabled people who face extra financial barriers and a higher cost of living; the average disabled household faces £975 a month in extra costs<sup>8</sup>. Older people may also be affected by cost changes, as older people are more likely to be reliant on fixed incomes (such as pensions).

4.34 Cost savings were identified for some routes that avoid Bank. These savings are relatively low for a single journey, though the potential cumulative cost impact for people who regularly make this journey could be considered a positive impact for disabled people and older people on fixed incomes (such as pensions) that are more likely to make taxi journeys.

4.35 However, cost increases were also identified for some routes that avoid Bank. These savings are relatively low when considering a single journey, however the potential cumulative cost impact for people who regularly make this journey could be considered as a negative impact for disabled people and older people on fixed incomes (such as pensions) that are more likely to make taxi journeys.

4.36 Subsequently, we have further analysed the cost impact of routes that are more expensive when avoiding Bank, in relation to the Taxicard scheme. The Taxicard scheme provides subsidised taxi journeys for people with serious mobility impairments who experience difficulty using public transport. The scheme is funded by Transport for London and all the London boroughs and is administered by London Councils. It allows those with a Taxicard to make journeys in licensed London taxis and private hire vehicles at a reduced rate<sup>9</sup>. Using the findings of the WSP report, the cost implications for Taxicard users have been identified and summarised below.

#### *Taxicard Review*

4.37 Taxicard journeys have a maximum fare guarantee based on price per mile. For any journeys made where the metered fare is lower than this maximum fare, the individual's contribution is based on the metered fare with a fixed subsidy for journeys over 3 miles. These charges change dependent on the borough the Taxicard user lives in. For most boroughs (including CoL), the single subsidy is £10.00, and the minimum member fare is £3.80<sup>10</sup>

4.38 Using the journey time data from the WSP Report, the changing cost of taxis for Taxicard users (whose costs are calculated by mile) has been calculated in Table 4.1.

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<sup>8</sup> <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag-2023/>

<sup>9</sup> [Taxicard - Transport for London \(tfl.gov.uk\)](https://www.tfl.gov.uk/road-users/taxicard/)

<sup>10</sup> [Payment | London Councils](https://www.london.gov.uk/transport/taxicard/payment)



- 4.39 Using the Northbound case study, travelling from Southwark Street to Silk Street via Bank is 1.57 miles which would cost £3.80 with a Taxicard (£12.15 without one). With the same origin and destination, but avoiding the Bank restrictions, this 2.4 mile journey would cost £4.30 with a Taxicard (£13.88 without one).

**Table 4.1: Taxicard Cost Analysis**

Route	Via	Distance (miles)	Price (standard)	Price with Taxicard
Southwark to Silk Street - Northbound	Bank	1.57	£12.15	£3.80
Southwark to Silk Street - Northbound	Alternative route	2.4	£13.88	£4.30
Whitechapel High Street to Blackfriars Station - Eastbound	Bank	2.5	£13.42	£4.30
Whitechapel High Street to Blackfriars Station - Eastbound	Alternative route	1.8	£13.90	£3.80
Fenchurch Street Station to Giltspur Street - Westbound	Bank	1.5	£11.00	£3.80
Fenchurch Street Station to Giltspur Street - Westbound	Alternative route	1.7	£8.67	£3.80
Liverpool Street to Queen Street - Eastbound	Bank	1.6	£11.85	£3.80
Liverpool Street to Queen Street - Eastbound	Alternative route	1.0	£11.00	£3.80

- 4.40 This suggests that Taxicard users may experience both minor positive or negative cost impacts, depending on the passenger origin and destination.
- 4.41 For the Southwark to Silk Street route, there is a 13 per cent cost increase for Taxicard users, when using a route that avoids Bank. Meanwhile, travelling eastbound from Whitechapel High Street to Blackfriars Station via Bank presents a 13 per cent cost increase for Taxicard users in comparison to alternative routes. For both routes, this raw cost is a difference of £0.50, which may be considered to be a relatively small cost difference for a single journey. Subsequently, cost analysis indicates that Bank restrictions do not have a significant disproportionate negative or positive impact for disabled people who use Taxicard.
- 4.42 It is recommended that The City of London Corporation monitor fares of alternative taxi routes regularly and ensure that future plans and strategies which could further impact taxi fare costs are discussed in collaboration with taxi-users experiencing multiple and complex disadvantage.

# 5 Crime Data Analysis

## Introduction

5.1 In response to concerns raised in relation to public safety as a result of the motor restrictions in place at Bank junction, data for the Bank junction area has been analysed. Data from 2016 to 2023, covering the period between September 1<sup>st</sup> and November 29<sup>th</sup> has been downloaded from data.police.uk, which provides open data about crime and policing in England, Wales, and Northern Ireland. This police data records 14 different categories of criminal activity at street-level. Given the concerns expressed by some stakeholders about the potential implications of the motor traffic restrictions on public safety, analysis was undertaken for following categories of crime:

- Anti-social behaviour
- Public order
- Theft from the person
- Violence and sexual offences
- Robbery

5.2 It should be noted that whilst this data can be used to analyse and illustrate trends in criminal activity, it is not possible to attribute a direct effect caused by the All Change at Bank scheme, or the Bank on Safety scheme.

5.3 In addition, the Office of National Statistics recommends that police recorded crimes should be interpreted with caution as trends may reflect improvements made by police forces in identifying and recording offences, as well as an increase in victims reporting incidents<sup>11</sup>.

## Methodology

5.4 The three months of September, October and November were selected for analysis to provide a ‘snapshot’ of activity to facilitate comparison between years. At the time of analysis, data from November 2023 was the most recent crime data available. Analysing the three most recent months available allowed for the analysis to align with the full extent of the All Change at Bank restrictions. A timeline of changes to highway layout, public realm, and motor restriction at Bank junction is presented in **Table 5.1** overleaf. A map indicating the location of the Bank junction area is presented in **Figure 5-1**.

5.5 Throughout analysis, this September – November period will be referenced as the year from which the data has been collected. 2016 was selected as the starting point for analysis, as this was the final year of the original layout of Bank junction, pre-dating the Bank on Safety<sup>12</sup>

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<sup>11</sup> [Crime in England and Wales: year ending June 2023](#)

<sup>12</sup> The Bank on Safety scheme at Bank Junction in CoL focuses on restricting the number of vehicles that cross Bank Junction during the working day, primarily in order to significantly reduce the number of collisions occurring at this

scheme (the predecessor to the All Change at Bank scheme). 2020 has been excluded from this analysis due to the implications for policing and criminal activity associated with the impacts of the COVID-19 pandemic<sup>13</sup>.

**Table 5.1: Timeline of highway layout changes and motor traffic restrictions at Bank junction**

Year	Highway layout and motor traffic restrictions at Bank junction
2016	Original layout, no interventions.
2017	'Bank on Safety' experimental scheme introduced in May 2017
2018	Bank on Safety scheme made permanent September 2018.
2020	Temporary improvements installed between January and September 2020, including wider pavements, wider and shorter pedestrian crossings, to relieve pedestrian crowding.
2021	Public consultation on 'All Change at Bank' scheme
2023	Traffic orders gradually introduced from February 2023 – November 2023 including the following restrictions to motor vehicle access: <ul style="list-style-type: none"> <li>• Queen Victoria Street, at its junction with Mansion House Street, closed to all motor vehicles (February)</li> <li>• Threadneedle Street, between Bank Junction and Bartholomew Lane, closed to all motor vehicles (July).</li> <li>• No motor vehicles to enter from the north end of Princes Street heading southbound, except buses and for access (to Princes Street and Cornhill) (November)</li> </ul>

**Figure 5-1: Bank Junction Area**



Basemap source: Bing Maps, 2024

location. Under the scheme only buses and pedal cyclists are allowed to cross Bank Junction or access Cornhill in a westbound direction from Monday – Friday 7am-7pm.

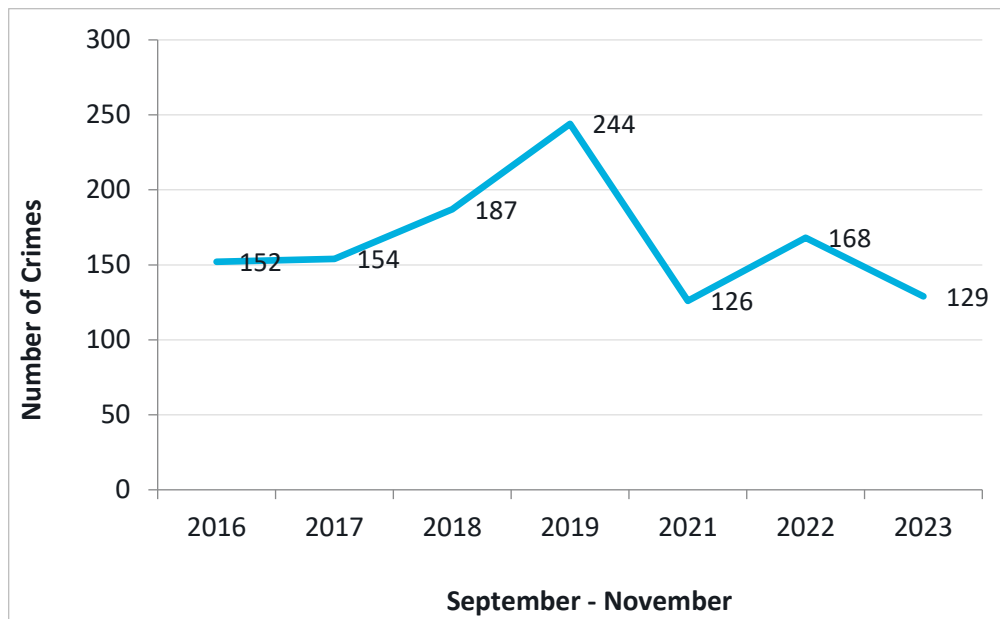
<sup>13</sup> Across the United Kingdom, most crime types experienced sharp, short-term declines during the COVID=19 lockdown restrictions, followed by a gradual resurgence as restrictions were relaxed (see **Kirchmaier and Villalera, 2020**).

## Analysis

### Crime Rates

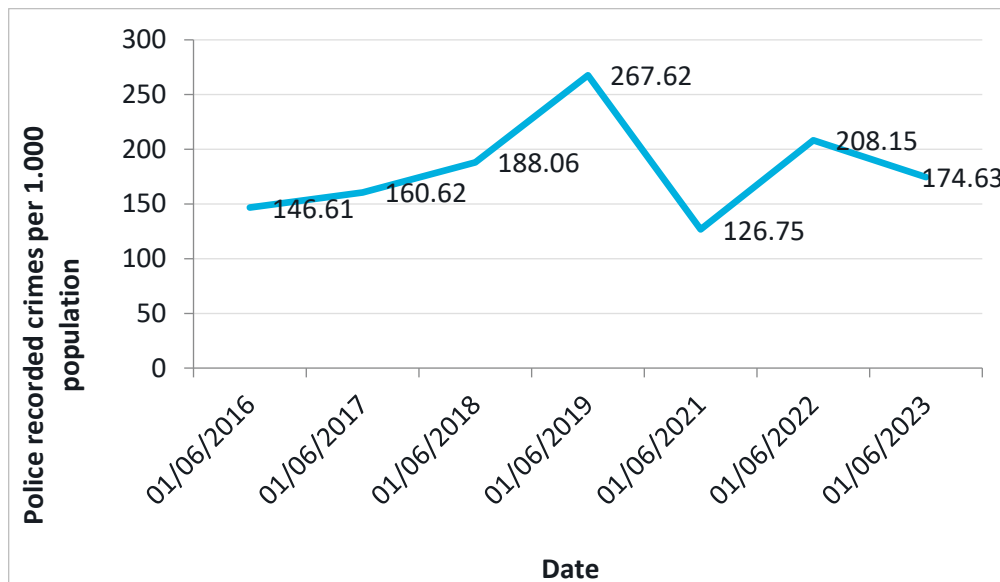
- 5.6 Between 2016 and 2023, the overall trend illustrates a decrease in the total number of crimes in the Bank Junction area, however, there are periodic changes within this overall trend.

Figure 5-2: Number of Crimes – Bank Junction (Sept-Nov) 2016 – 2023



Source: data.police.uk

Figure 5-3: Crime Rates – City of London, (Sept-Nov) 2016 – 2023



Source: www.police.uk

- 5.7 Between 2016 and 2019, the total number of crimes recorded in the Bank junction area rose by approximately 60 per cent. Between 2019 and 2021, the total number of crimes decreased by approximately 48 per cent. The total number of crimes rose again in 2022 and decreased again in 2023 (**Figure 5-2**). These patterns and overall trend of crime rates<sup>14</sup> align with the crime rates across CoL (**Figure 5-3**).
- 5.8 This broad trend also aligns with research findings<sup>15</sup> which indicate continuation of a long-term downward trend in crime since the beginning of the COVID-19 pandemic. The Crime Survey for England and Wales (CSEW) for the year ending June 2023 showed that total crime decreased by 10 per cent compared with the year ending June 2022, and 18 per cent lower than the year ending March 2020. This suggests that the rate at which crime is happening within the Bank junction area is aligned with wider patterns across CoL, and nationally, and does not present a positive or negative correlation with the introduction of restrictions at Bank junction.

#### **Implications for EqIA**

- 5.9 Overall, the fluctuations in number of crimes recorded in the Bank junction area have been proportional to crime rate trends across CoL. This indicates that overall crime level changes within the Bank junction area have not been disproportionate to the immediate surrounding area.

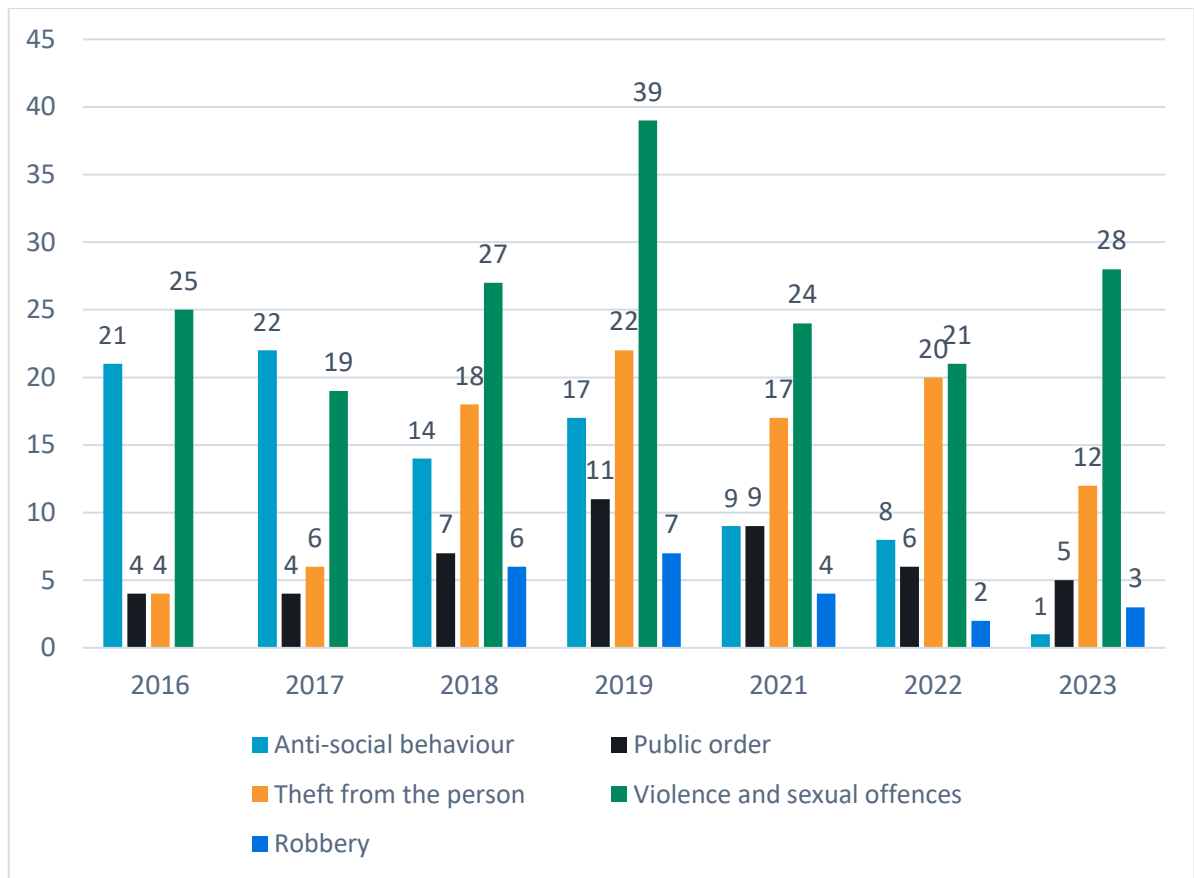
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<sup>14</sup> <https://www.police.uk/pu/your-area/city-of-london-police/performance/compare-your-area/?tc=cp>

<sup>15</sup> Crime Survey for England and Wales (CSEW), 2023

## Types of Crime

Figure 5-4: Relevant crimes, Bank junction area, 2016 – 2023

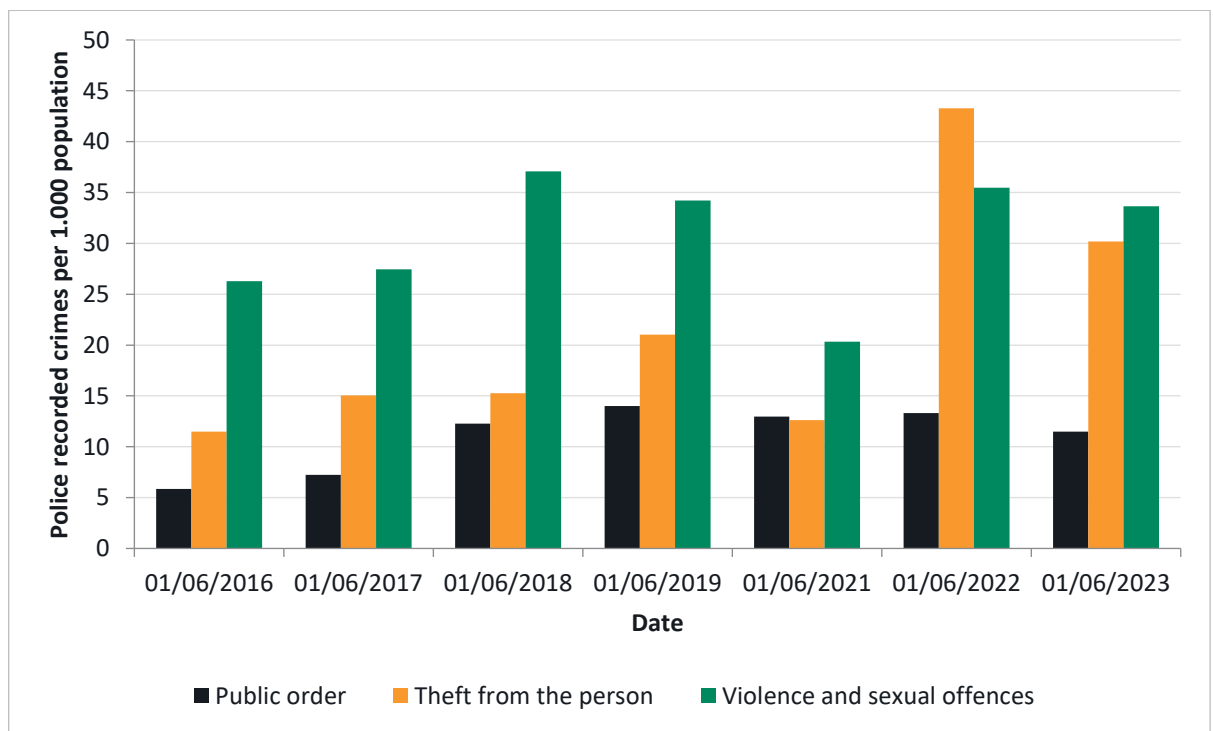


Source: data.police.uk

- 5.10 **Figure 5-4** shows that within the Bank junction scheme area, most violent crime types generally reached a peak in 2019, and have subsequently decreased, which aligns with the broader crime rate trends over this time (see **Figure 5-2**).
- 5.11 Exceptions to the trend include crimes recorded as anti-social behaviour. These crimes have decreased since 2017; one crime was recorded as anti-social behaviour between September – November 2023. Public order offences were also relatively low and indicated a relatively small decrease between 2022 and 2023.
- 5.12 In addition, violence and sexual offences peaked in 2019, decreased until 2022, and increased again in the September – November 2023 period. This presents a moderate percentage increase of 33.3 per cent in comparison to September – November 2022. This finding contrasts with the broader crime rate trend for violence and sexual offences across CoL (**Although there** has been a small increase of violent and sexual offences in the Bank area between 2022 and 2023, it should be noted that this represents a small increase in terms of raw numbers (+7 additional violent and sexual offences). As such, this is too small of a change to be attributed directly with the All Change at Bank scheme. In addition, it is recommended that ongoing monitoring of this type of violent crime is undertaken to determine whether any future trends are disproportionate in comparison to historic trends, and trends displayed around CoL.
- 5.13 **Figure 5-5**), which increased in 2022, and decreased slightly in 2023.

- 5.14 In addition, between 2016 and 2023, rates of violence and sexual offences have been consistently recorded in relatively high proportions in comparison to other crime types. During this time, in both the Bank junction and wider City, violence and sexual offences comprised the highest or second highest rate or violent crimes. Subsequently, this does not indicate that there is a correlation between the introduction of restrictions at Bank junction with an increase in violence and sexual offences. This is because more violent and sexual offences have been recorded than other violent crime types between 2016 – 2023 (with the exception of 2017). Subsequently, the data from 2023 in relation to violent crimes suggests a continued trend of a higher proportion of violent and sexual offences in the Bank junction area, in comparison to other violent crimes.
- 5.15 Although there has been a small increase of violent and sexual offences in the Bank area between 2022 and 2023, it should be noted that this represents a small increase in terms of raw numbers (+7 additional violent and sexual offences). As such, this is too small of a change to be attributed directly with the All Change at Bank scheme. In addition, it is recommended that ongoing monitoring of this type of violent crime is undertaken to determine whether any future trends are disproportionate in comparison to historic trends, and trends displayed around Col.

Figure 5-5: Crime rates of relevant crimes, City of London (Sept-Nov) 2016 - 2023



NB: Anti-social behaviour rates were not included in the crime-rate dataset

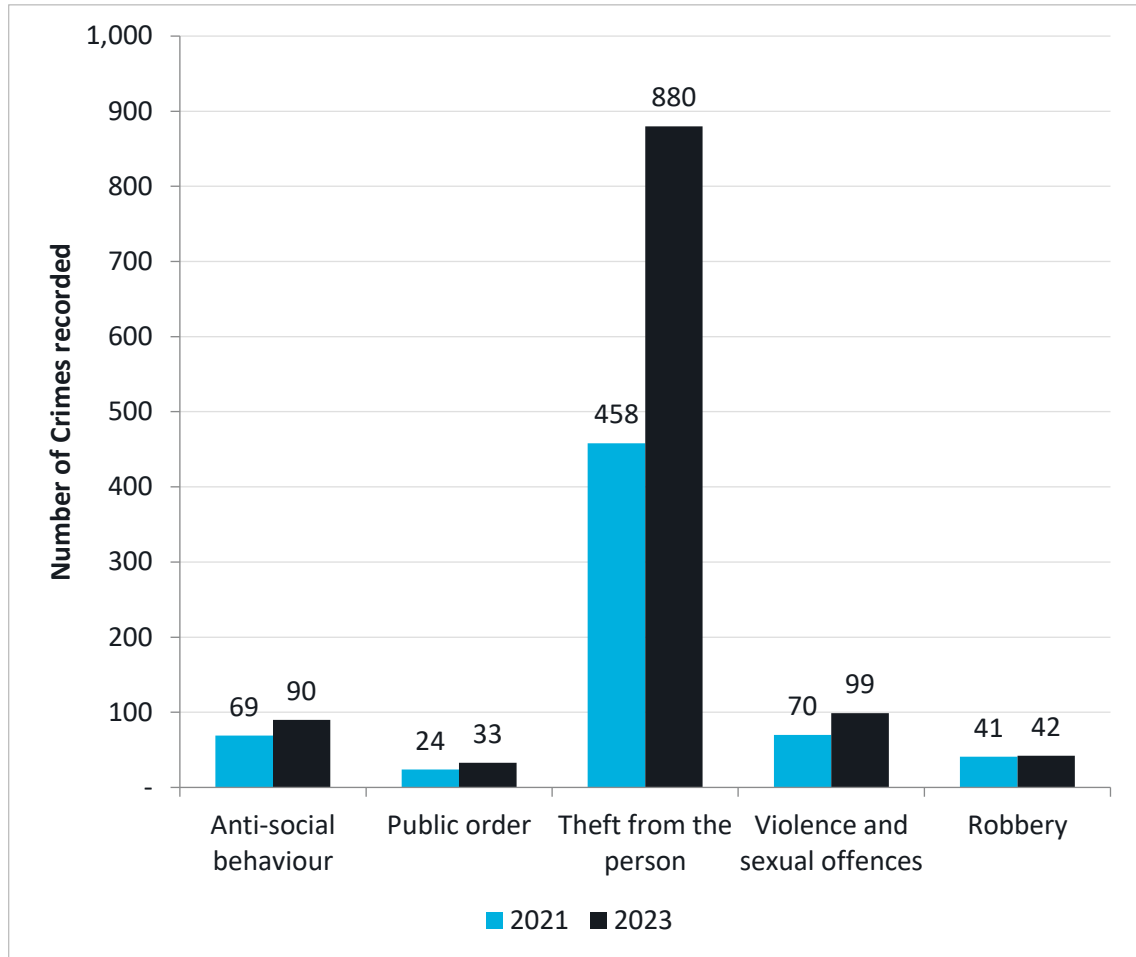
Source: [www.police.uk](http://www.police.uk)

Comparison with a proxy area

- 5.16 Oxford Street has been chosen as a proxy area to compare trends in crime with the Bank junction scheme area. Both areas feature relatively high levels of street-level activity as they are prominent locations in central London. In general, Oxford Street recorded a higher quantum of criminal activities. In addition, crime analysis of Oxford Street indicates that between 2021 and 2023, there was a rise in violence and sexual offences (+41.43 per cent),

suggesting that the trend outlined in the Bank junction area (see **Figure 5-4**) is not disproportionate in comparison to wider London. In addition, this analysis indicates that Bank junction has experienced a smaller increase than that experienced at Oxford Street.

**Figure 5-6: Oxford Street, changes in violent crime, 2021 - 2023**



Source: *data.police.uk*

### Implications for EqIA

5.17 Between 2022 and 2023, the number of violent and sexual offences rose within the Bank scheme area (7 additional crimes). Between 2022 and 2023, the crime rate for this offence fell within the wider City of London. Personal safety, (or perception of personal safety) may impact some people more than others<sup>16</sup>, particularly women<sup>17</sup>, LGBTQ+ individuals<sup>18</sup>, and ethnic minorities who may experience higher rates of harassment.

<sup>16</sup> [Office of National Statistics, 2022, Public Safety](#)

<sup>17</sup> <https://www.london.gov.uk/media/99003/download?attachment%20>

<sup>18</sup> <https://www.sustrans.org.uk/media/10527/sustrans-2021-walking-and-cycling-index-aggregated-report.pdf>



### Spatial Analysis

- 5.18 Coordinates linked to relevant crimes in the Bank junction area have been mapped to present changes in crime location over time. It should be noted that the preciseness of this spatial analysis is limited, as coordinates represent the approximate location of a crime, and not the exact place that it occurred. In addition, estimates of geocoding accuracy in different police forces range from 60 per cent to 97 per cent<sup>19</sup>.
- 5.19 Nevertheless, the data presents an indication of crime location, which has been mapped from 2016 – 2023. This is presented in **Figure 5-7 to Figure 5-13**.
- 5.20 Results of this analysis indicate that over time, crime hotspots have become increasingly associated with the periphery of the Bank area. In addition, the types of violent crime that have been recorded across the Bank area are not consistently linked to any particular location. As such, this coordinate data indicates that there is no spatial correlation between location of violent crime, and the type of violent crime that was recorded.

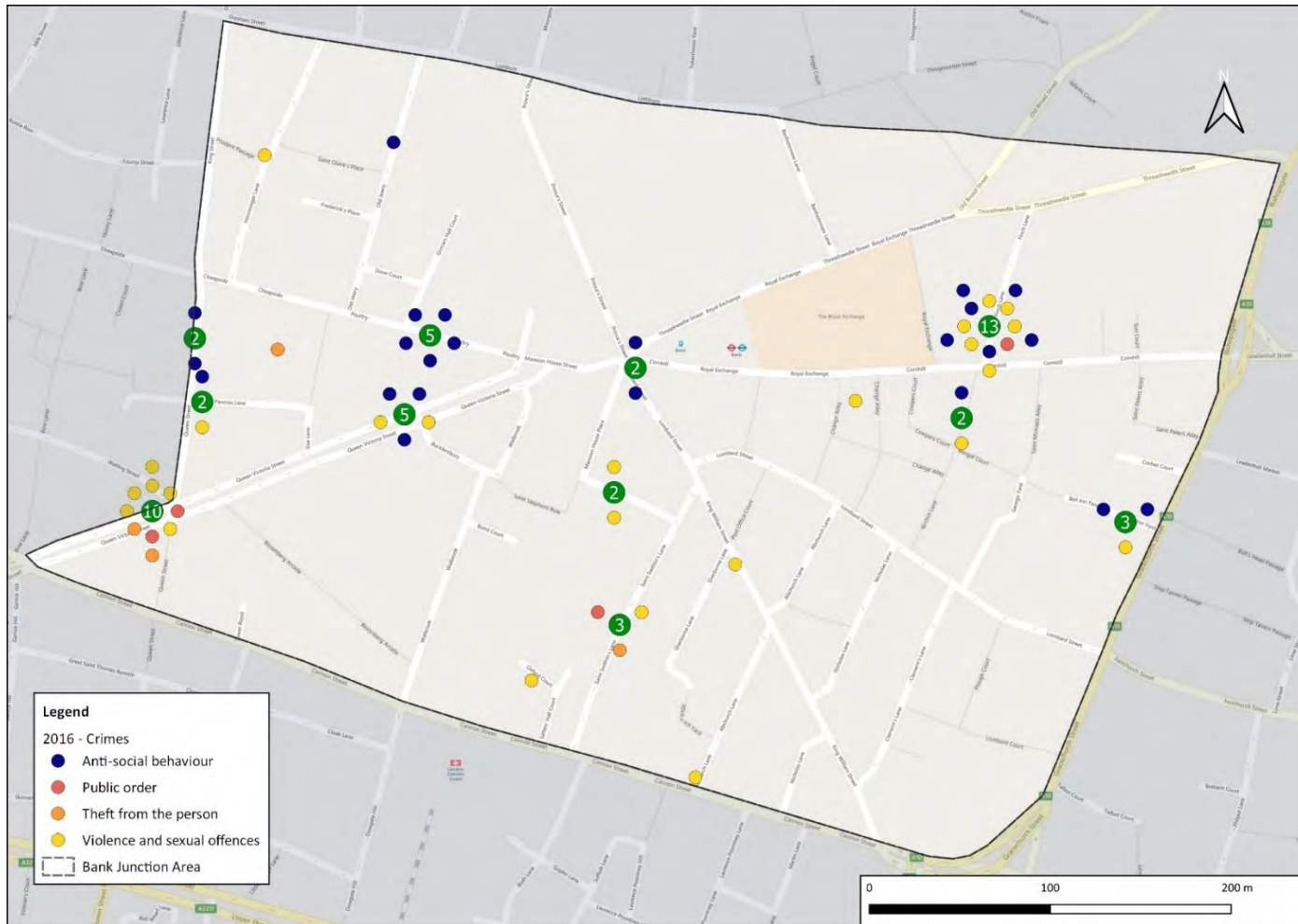
### Implications for EqIA

- 5.21 Personal safety, (or perception of personal safety) may impact some people more than others, particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment. Spatial analysis indicates that crime has shifted towards the periphery of the Bank junction area. Decreased crime recorded at the centre of the Bank junction area could present positive impacts for people with the protected characteristics identified. Whilst this indicates a potential spatial correlation with the introduction of the All Change at Bank motor restrictions and wider public realm improvements, greater location data accuracy for crimes recorded would be required to support this potential correlation.
- 5.22 In addition, this spatial analysis could suggest that there are more concentrated ‘hotspots’ of crime occurring at locations, which could decrease the perception of public safety for people with the protected characteristics identified above. Some locations have recently recorded higher concentrations of crime, such as Finch Lane and Lombard Street. It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police to establish whether this spatial trend continues. In addition, public realm within these emerging hotspots could be reviewed to identify appropriate interventions that could support greater security and an increased sense of public safety.
- 5.23 It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police to be able to respond appropriately to sudden or disproportionate changes to crime trends in the Bank junction area, in comparison to historic trends, or when compared to the wider CoL.

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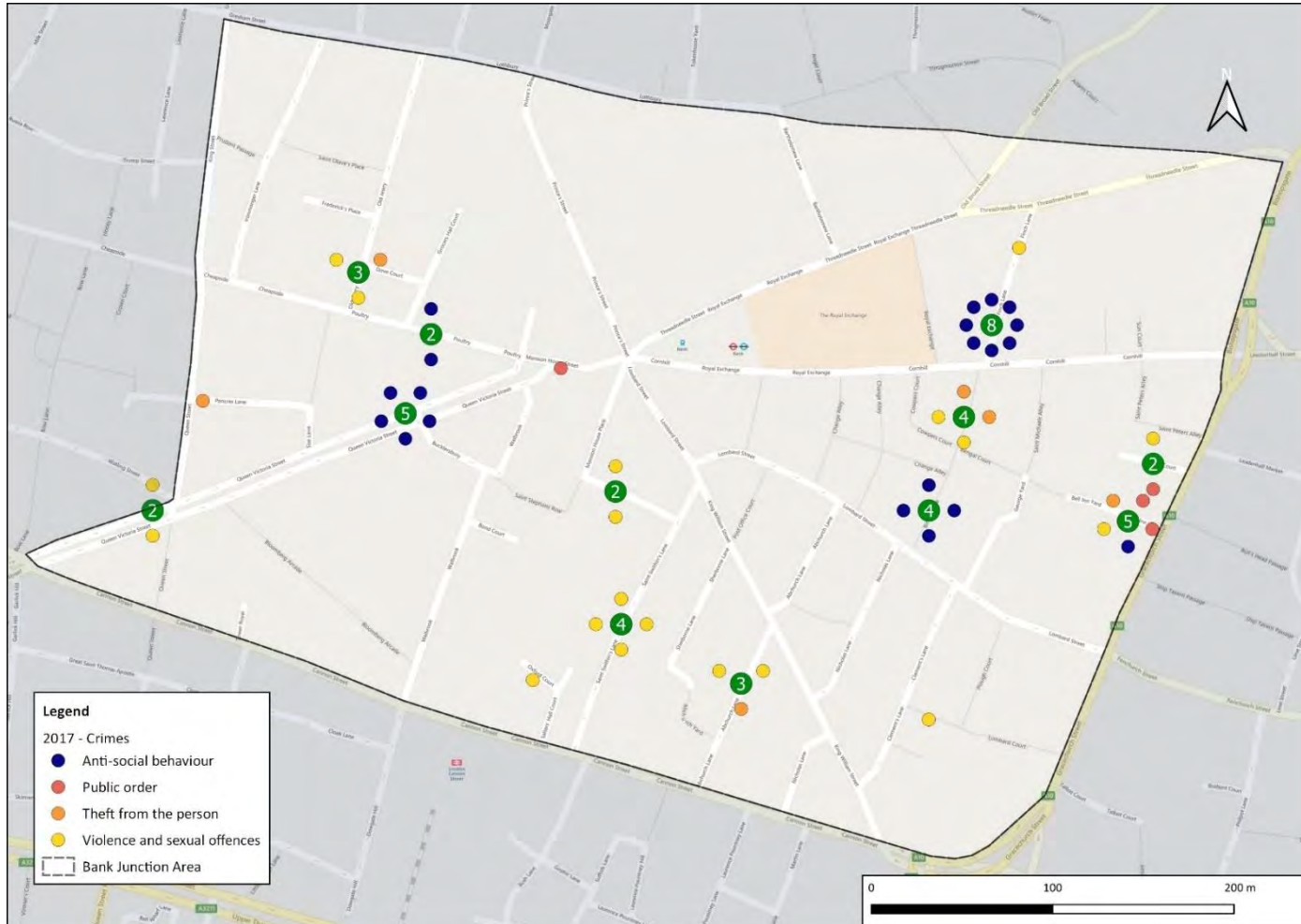
<sup>19</sup> <https://data.police.uk/about/#location-anonymisation>

Figure 5-7: Spatial distribution of relevant crimes, Bank junction, 2016



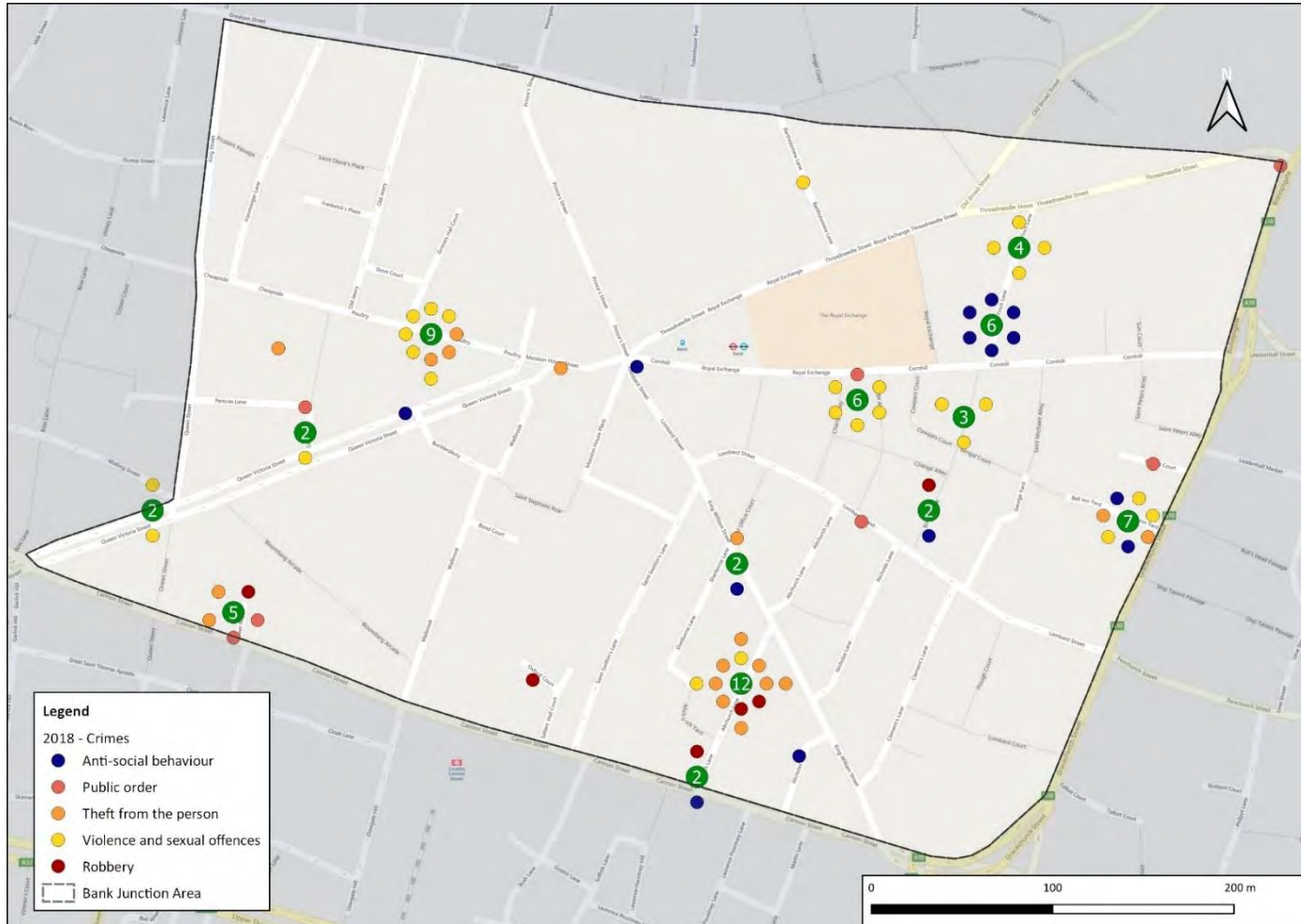
Basemap source: Bing Maps, 2024

Figure 5-8 Spatial distribution of relevant crimes, Bank junction, 2017



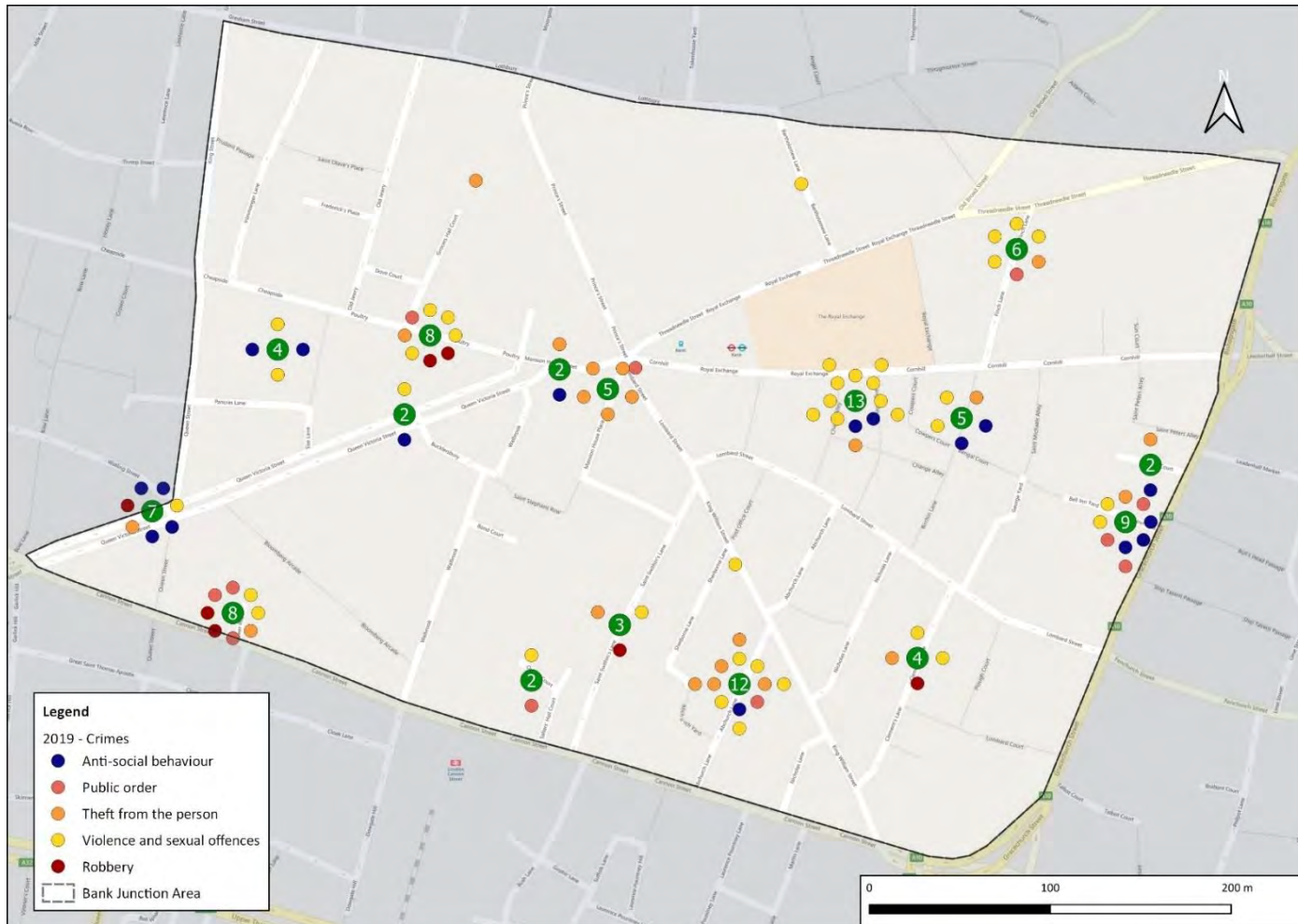
Bsaemap source: Bing Maps, 2024

Figure 5-9 Spatial distribution of relevant crimes, Bank junction, 2018



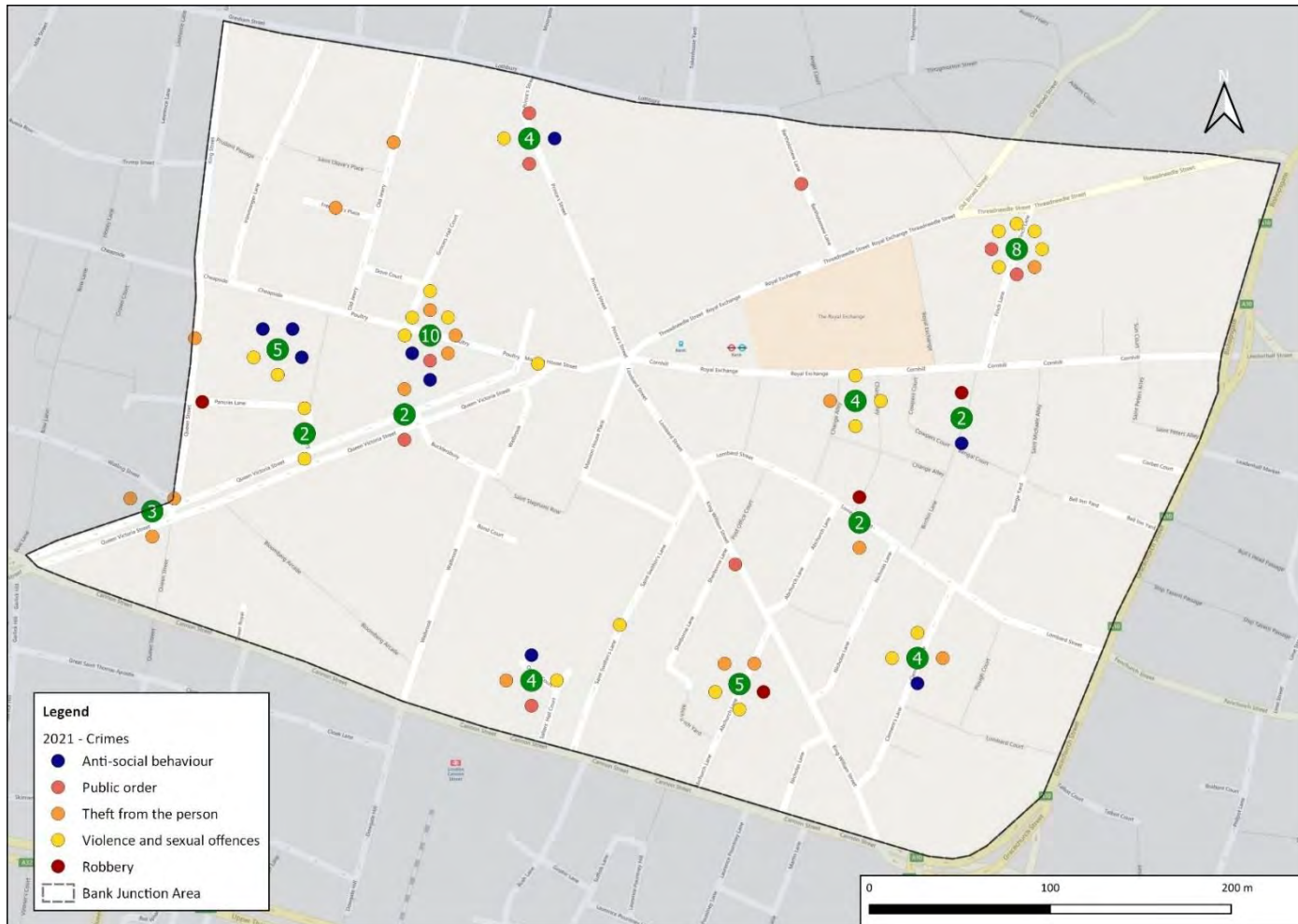
Bsaemap source: Bing Maps, 2024

Figure 5-10 Spatial distribution of relevant crimes, Bank junction, 2019



Bsaemap source: Bing Maps, 2024

Figure 5-11 Spatial distribution of relevant crimes, Bank junction, 2021



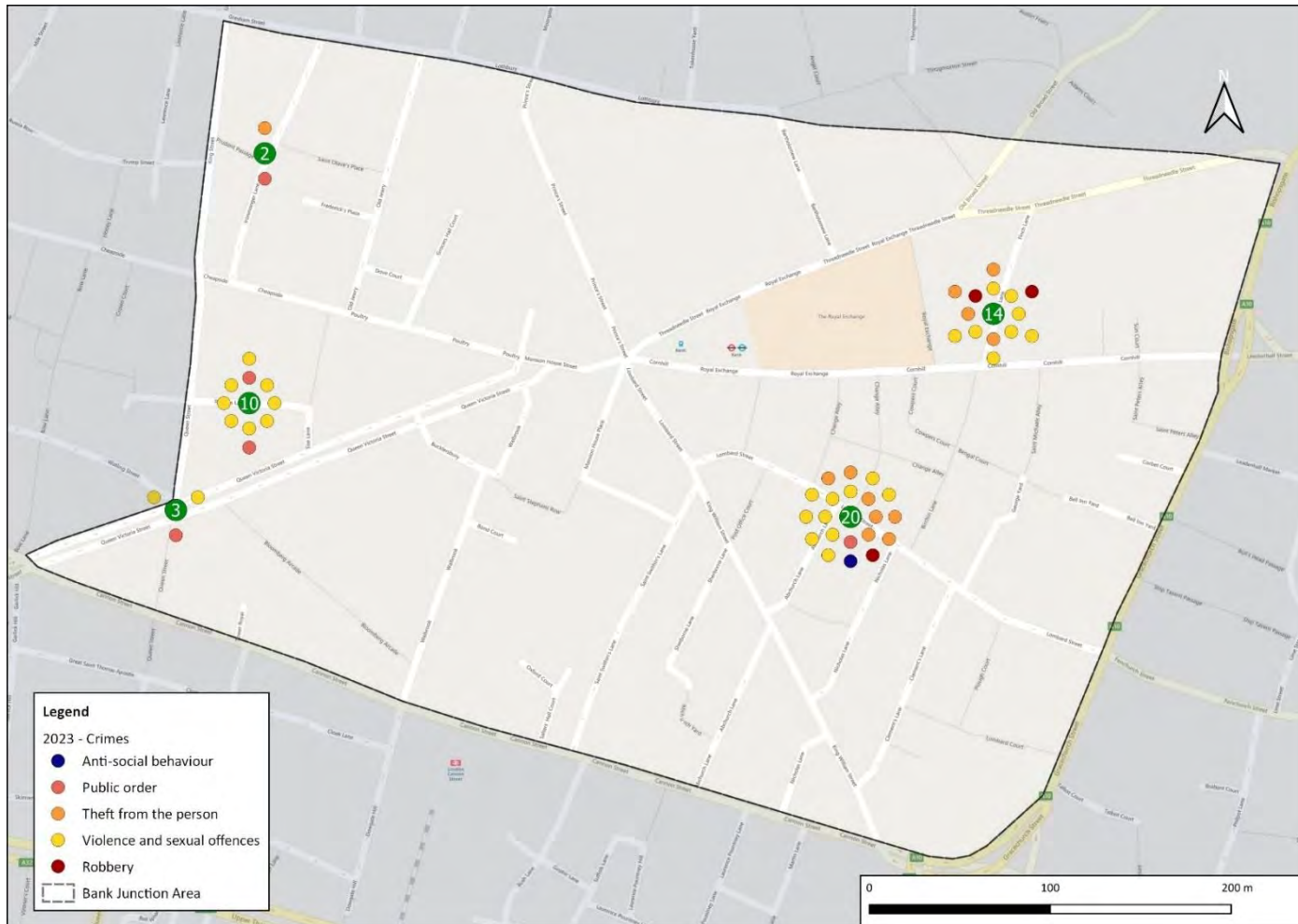
Bsaemap source: Bing Maps, 2024

Figure 5-12: Spatial distribution of relevant crimes, Bank junction, 2022



Bsaemap source: Bing Maps, 2024

Figure 5-13: Spatial distribution of relevant crimes, Bank junction, 2023



Bsaemap source: Bing Maps, 2024



## 6 Oyster Card Data

### Introduction

- 6.1 The All Change at Bank scheme area includes the following bus stops, which serve the routes outlined in the table below. These bus routes connect Bank junction with north, east, central south-west and south London.

**Table 6.1: Bus stops and routes serving the Bank junction area**

Street Name	Stop Name	Route								
Princes Street	Bank Station/Princes Street (Stop A)	21	43	141						
Princes Street	Bank Station / Princes Street (Stop B)	21	43	141						
Cornhill	Bank Station / Cornhill (Stop E)	8	25	26	N8	N25	N26	N242	N550	N551
Cornhill	Bank Station / Cornhill (Stop D)	8	25	26	N8	N25	N26	N242	N550	N551
Cornhill	Bishopsgate City of London (Stop R)	8	25	26	N8	N25	N26	N242	N550	N551
King William Street	Bank Station / King William Street (Stop F)	21	43	133	141	N21				
King William Street	King William Street / Monument Stn (Stop G)	21	43	133	141	N21				
Poultry	Bank Station / Poultry (Stop K)	8	25	26	133	N8	N25	N26	N242	N550
Poultry	Bank Station (Stop L)	8	25	26	133	N8	N25	N26	N242	N550

### Methodology

- 6.2 Oyster Card data, for passengers boarding the bus stops in **Table 6.1** above has been analysed, and the equality implications of these findings have been assessed.
- 6.3 This data is an average of passenger data, for the 20 weekdays from 18<sup>th</sup> September 2023 to 13<sup>th</sup> October 2023. Subsequently, this data reflects a recent profile of Oyster Card users within the Bank scheme areas, and of passengers using the routes outlined in **Table 6.1**, and does not include comparison before and after the introduction of the scheme.
- 6.4 To note, there is no ticket type disaggregation for departure load data, due to the way the occupancy data is scaled to account for non-inferred journeys. We do not have comparative

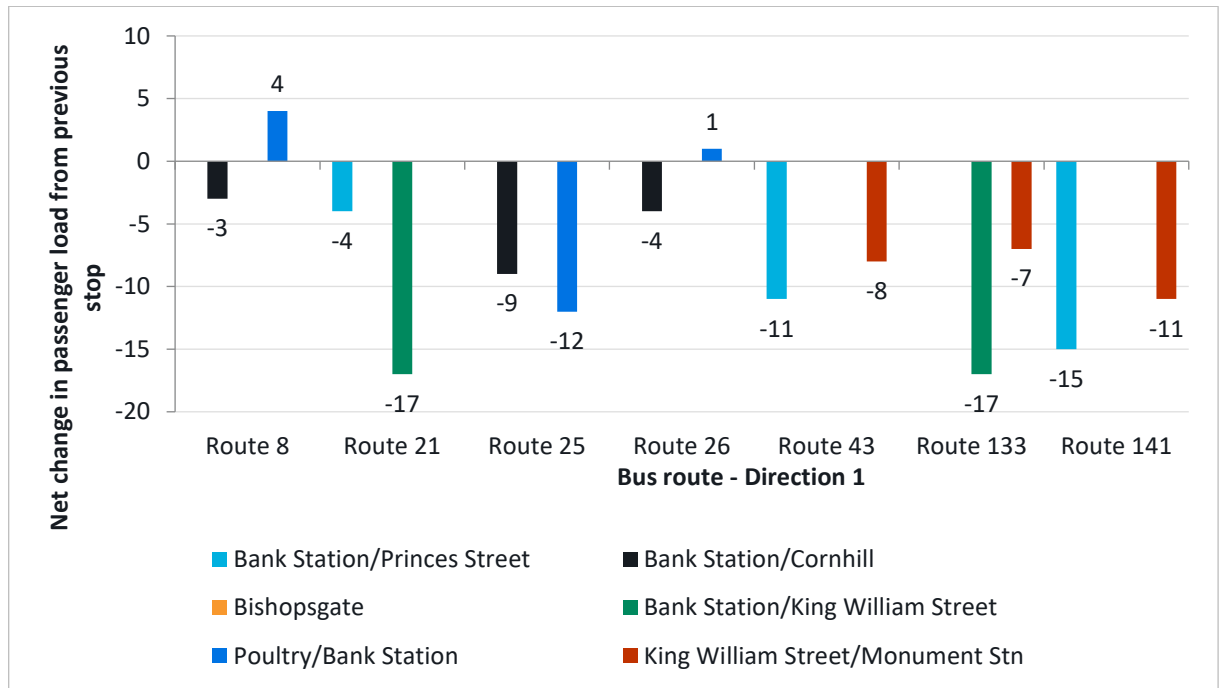
data for before / after the scheme so cannot compare the impact of the scheme compared to that prior implementation.

## Analysis

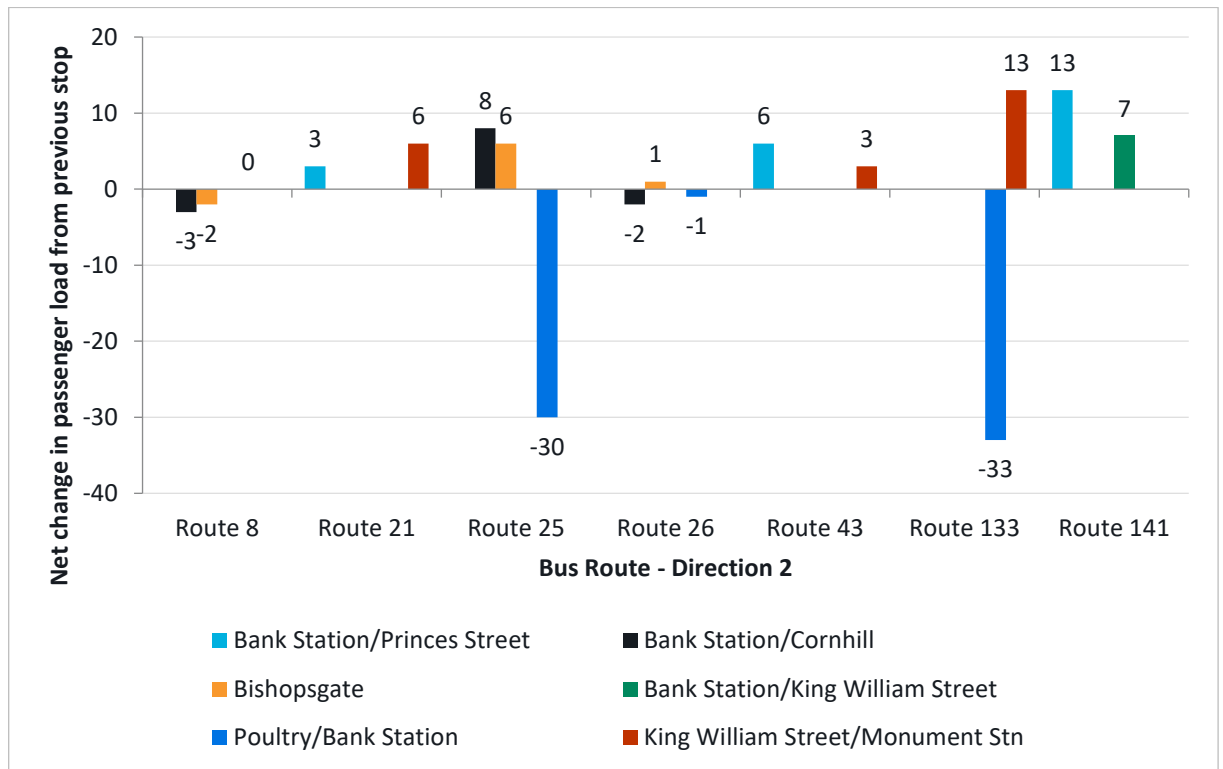
### Departure Loads

- 6.5 Analysis was undertaken to establish the average departure load of passengers for bus stops within the scheme area. On average, across the whole day, there is primarily a ‘net loss’ of passengers to bus stops within the Bank junction scheme area in comparison to the previous stop (see Figure 6-1 and Figure 6-2).
- 6.6 This indicates that more people alight buses than board buses within the Bank junction area. However, there are limitations to conclusions drawn from this analysis; whilst net departure load changes could appear low, this does not, for instance, necessarily relate to ‘busyness’ around a bus stop location. This is because a net gain/loss does not account for the potential exchange of passengers alighting and boarding the buses in equal proportion.

**Figure 6-1 Average net change in passenger departure load from previous stop, for bus stops within the scheme area – Direction 1 (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**



**Figure 6-2: Average net change in passenger departure load from previous stop, for bus stops within the scheme area – Direction 2, (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**



### Implications for EqIA

- 6.7 There are no specific implications that can be concluded by departure load analysis, as equalities data is not contained within the dataset. However, departure load analysis indicates that some bus routes have a greater ‘net loss’ and ‘net gain’ of passengers to the Bank area.
- 6.8 Greater pedestrian footfall in limited space can be less comfortable for disabled people, older people, pregnant women, or people travelling with young children, who may find navigating busier areas more physically challenging or stressful.
- 6.9 It is recommended that the public realm around these bus stop areas is reviewed to ensure that these spaces offer appropriate and comfortable space and amenities to facilitate boarding and alighting for all bus users.

### Proportion of Oyster Card types used

- 6.10 Table 6.2 illustrates the proportions of the type of Oyster Card used to ‘tap onto’ buses within the scheme area. Oyster Card Types analysed include:
  - Under 18 – Zip cards, Child Bus and Tram Passes and Young Visitor discounts on Oyster
  - Freedom Pass Disabled
  - Freedom Pass Elderly
  - All Other Tickets – includes all other paper tickets, travelcards, ‘Pay-as-you go’ (PAYG) Oyster, Staff Passes and contactless payment cards (CPCs)
- 6.11 Where two bus stops have the same name, as they are on the same street, Oyster Card type use has been combined for these stops.

**Table 6.2: Oyster Card type used at bus stops in Bank Junction area, (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**

Bus Stop	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
Bank Station / Princes Street	0.7%	6.9%	1.4%	91.0%
Bank Station / Cornhill	0.4%	3.4%	1.9%	94.3%
Bishopsgate	0.4%	2.6%	3.2%	93.7%
Bank Station / King William Street	0.3%	5.5%	2.3%	92.0%
Poultry / Bank Station	0.4%	7.2%	0.8%	91.6%
<b>Proportion for all Bank junction bus stops</b>	<b>0.4%</b>	<b>5.4%</b>	<b>1.8%</b>	<b>92.4%</b>

6.12 **Table 6.3** presents the proportions of Oyster Card type that is used to ‘tap onto’ all bus stops that are included on the routes which serve the Bank junction scheme area (see **Table 6.1**). This includes 664 bus stops which are located across north, east, central, and south London, which can provide a sample that can be used to compare Oyster Card usage across Bank.

**Table 6.3: Proportion of Oyster Card types used at all bus stops on the routes serving the Bank junction scheme area (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**

Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
2.7%	10.0%	7.3%	80.0%

- 6.13 ‘All Other Tickets’ is associated with the highest Oyster Card usage within the Bank scheme area, comprising 91 per cent – 94.3 per cent of usage at each stop. This is over 10 per cent higher than the proportion indicated in **Table 6.3**. Subsequently, proportions of other types of Oyster Cards are generally significantly smaller than those outlined in **Table 6.3**.
- 6.14 In addition, except for the Bishopsgate bus stop, Oyster Card type usage for bus stops within the Bank area follow the same ranking as outlined in **Table 6.3**. ‘Freedom Pass Elderly’ is the second highest proportion of usage, followed by ‘Under 18’, and then ‘Freedom Pass Disabled’ Oyster Card types. For Bishopsgate, Under 18 usage is slightly higher than Freedom Pass Elderly usage.
- 6.15 Some bus stops indicate a higher use of certain card types in comparison to other bus stops within the Bank scheme area. For instance, Freedom Pass Elderly Oyster Card usage is higher at Bank Station/King William Street, Bank Station/Princes Street and Poultry/Bank Station. Under 18 Oyster Card usage is higher at Bank Station/Cornhill, Bishopsgate, and Bank Station/King William Street.
- 6.16 Across all bus stops in the Bank scheme area, use of ‘Freedom Pass Disabled’ Oyster Card types is relatively low, comprising less than 1 per cent of use. The highest proportion of use by this type of Oyster Card was at Bank Station/Princes Street.

*Proportion of Oyster Cards used, by time of day*

- 6.17 The following analysis assesses the usage of different Oyster Card types across bus stops in the Bank scheme area by the following time periods:
- **AM Peak:** 07:00 to 10:00
  - **Interpeak:** from 10:00 to 16:00

- **PM Peak:** from 16:00 to 19:00
- **Off Peak:** all other times

**Table 6.4: Proportion of Oyster Card types used at all bus stops in the Bank junction scheme area, by time of day (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**

Time	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
AM Peak	0.3%	1.8%	1.1%	96.7%
Interpeak	0.7%	9.9%	2.2%	87.3%
Off Peak	0.4%	3.4%	1.6%	94.7%
PM Peak	0.4%	5.6%	1.9%	92.1%

6.18 The following illustrates the proportions of Oyster Card type that is used to ‘tap onto’ all bus stops that are included on the routes which serve the Bank junction scheme area, by time of day. This again provides a sample that can be used as benchmark for comparing Oyster Card usage in Bank, by time of day.

**Table 6.5: Proportion of Oyster Card types used at all bus stops on the routes serving the Bank junction scheme area, by time of day (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**

Time	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
AM Peak	1.9%	4.0%	11.8%	82.3%
Interpeak	4.4%	17.5%	7.9%	70.2%
Off-Peak	1.7%	5.0%	2.6%	90.7%
PM Peak	2.4%	10.0%	8.2%	79.5%

6.19 Comparison between **Table 6.4** and **Table 6.5** indicates that ‘all other tickets’ usage comprises the highest proportion of Oyster Card usage, throughout the day. Use of Freedom Pass Elderly and Freedom Pass Disabled Oyster Card types is highest at the interpeak period, but this is still lower than the proportions outlined by all bus stops on the routes serving the Bank junction scheme area.

6.20 The following Bank junction bus stops indicate notable increases (>+3% from **Table 6.4**) in the proportion of Oyster Card type usage during the following time periods, in comparison to the Bank junction average. For this analysis, bus stop direction has been considered as notable changes were evidenced by route direction.

**Table 6.6: for Bus stops within the Bank junction area, that have a higher than average proportion of concessionary travel, by time of day, and bus route direction (18<sup>th</sup> September 2023 – 13<sup>th</sup> October 2023)**

Stop Name	Direction	Time	Card Type	Percentage
Bank Station / Princes Street	1	Interpeak	Freedom Pass Elderly	18.8%
Bank Station / Princes Street	1	Off-Peak	Freedom Pass Elderly	6.5%
Bank Station / Princes Street	2	Interpeak	Freedom Pass Elderly	12.8%
Bishopsgate	2	Interpeak	Under 18	7.2%

6.21 To note, Bank Station/Princes Street, Direction 1 in the AM Peak recorded the highest proportion of Freedom Pass Disabled bus users in the Bank junction area. 2.3 per cent of users were recorded using this Oyster Card type, which is higher than the average recorded across Bank junction bus stops.

### Implications for EqIA

- 6.22 Overall, in comparison to the comparative sample of Oyster Card usage across London, there is a lower use of concessionary Oyster Card types by people boarding bus services within the Bank junction area. This is likely due to factors that are not linked to the All Change at Bank scheme. For instance, as outlined in the Baseline evidence of the February 2023 EqIA report, there is a significant working population across the CoL, which is estimated to be approximately 68 times the usual CoL resident population. The most common age group of the Bank junction Workplace Zone is 30 -34. As such, it could be expected that there is a smaller proportion of concessionary travel to and from the area during weekdays by people with Under 18 and Freedom Pass Elderly Oyster Cards in comparison to people using 'All Other Tickets'.
- 6.23 However, at locations where higher proportions of concessionary travel has been identified, the public realm around these bus stop areas could be reviewed to ensure that these spaces offer appropriate and comfortable space and amenities to facilitate boarding and alighting for all bus users.
- 6.24 In addition, analysis indicates that use of Freedom Pass Elderly (9.9 per cent), Freedom Pass Disabled (0.7 per cent) and Under 18 (2.2 per cent) Oyster Card types is the highest during the interpeak period. This indicates that these users may experience positive impacts as a result of 7am – 7pm motor restrictions. Reduced road congestion can improve bus journey time and reliability, and passenger experience<sup>20</sup>. At a national scale, higher bus use is reported amongst older people; in particular, by older women<sup>21</sup>. As such, measures which support bus priority within the Bank junction area could presents a positive impact for these user groups, which may benefit as a result of the restrictions.
- 6.25 It is recommended that bus journey times within the Bank junction area are regularly monitored to evaluate whether the restrictions enable more reliable journey times as a result of reduced road congestion.

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<sup>20</sup> <https://www.cpt-uk.org/media/fe0ebaaj/bus-priority.pdf>

<sup>21</sup> <https://www.gov.uk/government/statistics/annual-bus-statistics-year-ending-march-2023/annual-bus-statistics-year-ending-march-2023>

# 7 Recommended Further Actions

7.1 Based upon the analysis undertaken in this Technical Note, the following actions are recommended:

- **Monitoring:** If any change is made to the existing traffic restrictions at Bank junction, it is recommended this change is implemented on an experimental basis, and that the CoL continues to monitor the scheme's impact through their existing monitoring and evaluation framework. This will provide scope to review the impact of the restrictions on equality, and potentially make amendments to the scheme if the impacts are deemed to be extensive and disproportionate.
- **Engagement with affected taxi users:** Where possible, engagement with affected taxi users (who rely on taxis as an essential mobility option) through existing channels of communication would allow CoL to gain a deeper understanding of the specific challenges taxi users face and tailor any potential amendments to better address their needs.
- **Ongoing dialogue with City of London Police:** It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police so that the Police can respond appropriately to sudden or disproportionate changes to crime trends in the Bank junction area, when compared to historic trends, or when compared to the wider CoL.

## Control Information

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### Distribution

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Client: CoL

### Version control/issue number

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1.0 Final

### Date

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16 April 2024





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## Appendix 4

Next steps and indicative programme.

Date	Action/task
June 2024	Court of Common Council Decides to retain the current traffic restrictions at Bank. Review ends and no further action taken

OR

The following outlines the indicative timetable for an experimental traffic order to be implemented.

Date	Action/task
June 2024	<p>Court of Common Council decides that a change to the traffic restrictions at Bank is required.</p> <p>This will start the detailed design process for a change to the traffic orders.</p>
June/July 2024	Officers undertake the relevant commissions to continue the traffic modelling process to the next stage and agree programme with TfL.
June to November 2024	<p>City and TfL continue working together on the Base and Future Base traffic modelling submissions and audits.</p> <p>Consultants run scenario tests for consideration setting out likely implications for traffic signal timing, journey time impacts and benefits of different routing options.</p> <p>Engagement with local stakeholders on the progress of the scenarios and likely recommendations to committee with any feedback incorporated into the committee report</p>
November 2024	Progress report to Streets and Walkways Sub committee for consideration of the scenarios tested

	<p>and a decision on the preferred routing for the restrictions to be 'relaxed'. This routing will then be progressed through the last stages of traffic modelling approvals.</p>
November 2024 to January 2025	<p>Submission of the proposed traffic model for TfL audit and sign off.</p> <p>Discussion of agreeable success criteria and likely monitoring strategy for the traffic experiment between the City and TfL.</p> <p>Continued engagement with local stakeholders</p>
January 2025	<p>Streets and Walkways consider final 'design' (what changes to the traffic signal timings would need to be undertaken, likely impact on journey times, updated Equalities analysis and the success criteria and monitoring strategy etc.) and authority to progress to the implementation of the experiment (subject to the successful sign off from TfL)</p>
February 2025	<p>TfL prepare internal Scheme impact assessment Report for final sign off of the Traffic Modelling process.</p>
March 2025	<p>If required, scheme presented at TfL Roads Space Performance Group (RSPG) ahead of City formally submitting its Traffic management (TMAN) application.</p>
April to May 2025	<p>Lead up to the experiment going live, new signage ordered, Traffic Order notice processed, stakeholder engagement and communications campaign launched.</p>
May 2025	<p>Experimental scheme goes live.</p> <p>Monitoring and statutory and public consultation begins.</p> <p>The experiment will run for up to 18 months before a final decision is taken based on meeting the success criteria and consideration of the monitoring information.</p>

## Appendix 5

### Proportion of Londoners using modes of transport at least once a week (2016/17) [11]

%	All	Men	Women	White	BAME	Aged 24 and under	65+	Earn less than £20,000	Disabled	Non-disabled
<b>Base</b>	<b>(17,560)</b>	<b>(8,450)</b>	<b>(9,110)</b>	<b>(11,173)</b>	<b>(6,099)</b>	<b>(4,437)</b>	<b>(2,691)</b>	<b>(4,966)</b>	<b>(1,729)</b>	<b>(15,831)</b>
Walking	95	95	95	95	96	97	87	93	81	96
Bus	59	56	63	56	65	66	65	69	58	60
Car as a passenger	44	37	51	43	46	62	41	38	42	45
Car as a driver	38	42	33	41	32	7	43	23	24	39
Tube	41	43	38	43	37	32	28	32	21	43
National Rail	17	18	15	19	13	12	12	11	9	17
Overground	12	13	11	12	12	10	6	11	7	12
Other taxi/minicab (PHV)	10	10	10	11	8	9	6	9	10	10
London taxi/black cab	3	3	2	3	1	1	2	2	3	2
DLR	5	6	4	5	7	5	2	5	3	5
Tram	2	2	2	2	2	3	2	2	2	2
Motorcycle	1	2	0	1	0	0	-	1	0	1
Bicycle	8	11	5	10	4	12	2	5	3	9

LTDS data in this report excludes children under five

Source page 19 of TfL report: [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/research-and-data/understanding-our-diverse-communities-2019)

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## **Appendix 6**

### **Comparison of taxi volumes to other Local Access Streets**

#### Introduction

The WSP Bank Junction Taxi availability analysis report (March 2024) suggested:

“In general, the Bank area exhibits lower taxi availability, which is to be expected as many of these streets are no longer through routes by car or taxi during the day. Additional data is required to assess how this compares to other local access streets that are not through routes to destinations.”

In response to this suggestion Officers looked at undertaking the same ‘Lights on light off’ survey as used for the WSP analysis on a further five local access streets but the cost was prohibitive.

Instead, data from traffic counts undertaken in 2022 has been used to compare the volume of taxis. The 2022 counts are from July and November, and an average of the two counts has been used in the analysis below.

#### Comparative streets

The choice of streets in the 2022 data is limited but three comparable local access streets were identified: Mark Lane, Old Broad Street and Old Bailey.

Mark Lane has a restriction preventing movement north towards Fenchurch Street. It provides a route to other side streets and premises. Mark Lane is one way and has some office and retail frontages. This is comparable to Queen Victoria Street (between Queen Street and Bank) where there is no through route possible for motor vehicles. Access to Bucklersbury and Walbrook (providing access to The Mansion House, the Magistrates Court, and the main Bloomberg office entrance) in addition to offices and leisure services in One Poultry are available, but frontage is relative inactive. Poultry is also similar but to a lesser degree as there are no other streets to access between Queen Street and Bank. There is an access to a service area on Grocers Hall Court and there is also access to one of the entrances to the Ned Hotel.

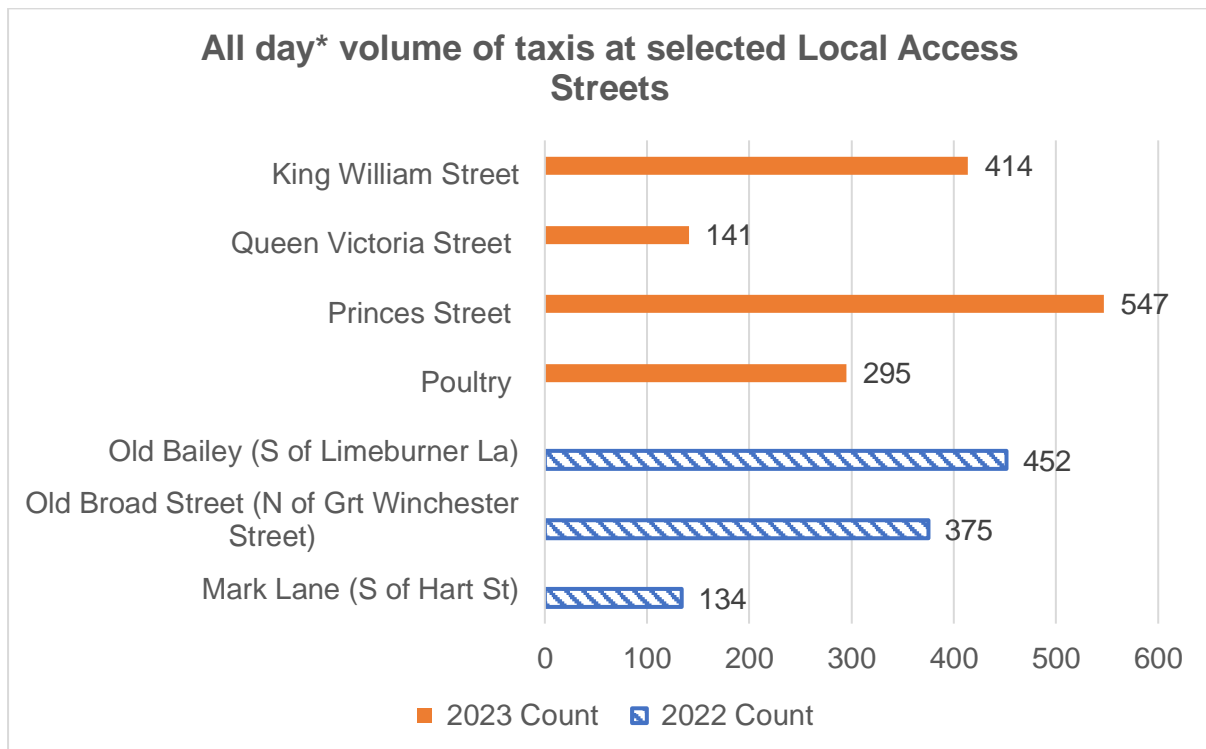
Old Broad Street is considered similar to King William Street. They both have a long stretch of office and retail frontages. Old Broad Street is operating one way northbound while King William Street is effectively one-way for access during the Bank restriction hours as taxis and other vehicles can only enter from the south.

Old Bailey has similarities with Princes Street. Old Bailey has a restriction by Limeburner Lane preventing vehicles from continuing southbound. Northbound vehicles do have a ‘through route’ with access to Giltspur Street, High Holborn and Newgate Street as well the Old Bailey. There are several office entrances and retail/services at ground level. Princes Street has little active frontage along its entire length but runs alongside the Bank of England. The accessible entrance for the Ned hotel and the entrance to Grocers Hall are also located along it. Princes Street provides an access route to Cornhill during restricted hours.

#### All day volumes

The 2023 surveys undertaken by WSP looked at availability of taxis did not undertake the survey for a full 24 hours, so the total day numbers are entirely not like for like. The 2023 survey was between 07:00 and 01.00 (the following morning). The 2022 data was midnight to midnight.

Graph 1: Showing total number of taxis counted on a selection of Local Access Streets in 2022 and 2023. \*2023 counts are only for 18 hours)



Recognising this disparity in the number of hours recorded, but also recognising that taxi volumes are generally low between 0100 and 07:00. Comparing the two data sets suggests there are similarities in the volume of taxis on Mark Lane and Queen Victoria Street and on Old Broad Street and King William Street.

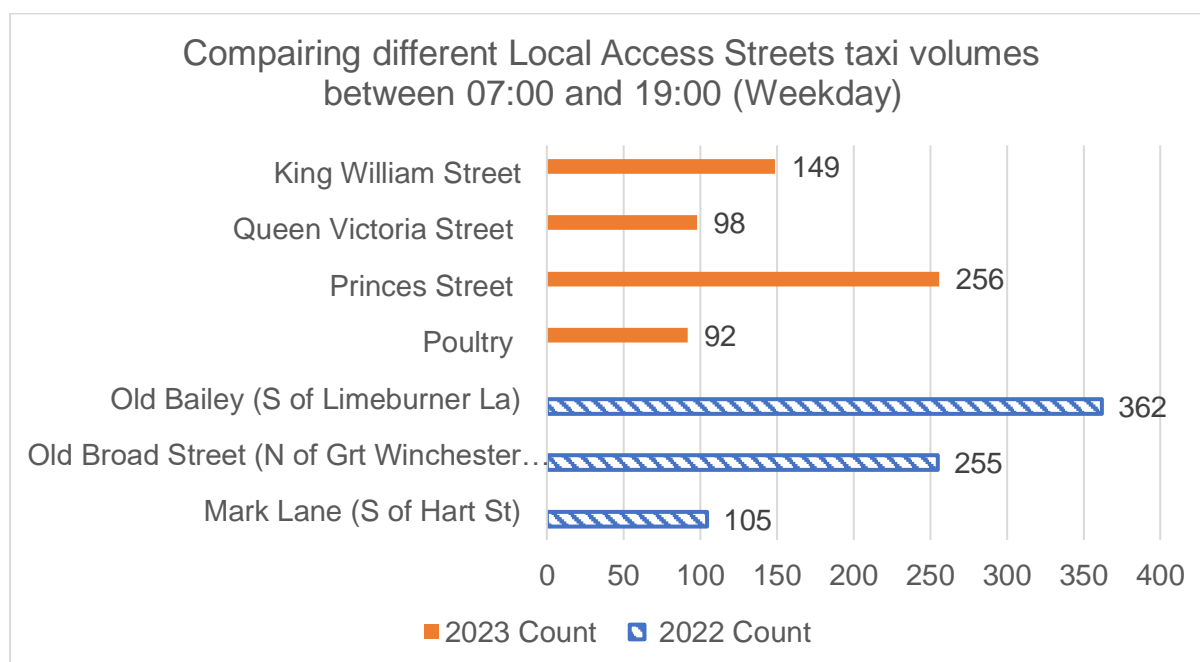
Princes Street has a larger volume of taxis across the day in comparison to Old Bailey, with Princes Street having an additional 95 taxis recorded. Poultry compared to Mark Lane has 161 more taxis across the day.

Taxis between 07:00 and 19:00

Looking at the same streets again but within the restricted hours of 07:00 to 19:00



Graph 2: Showing total number of taxis counted on a selection of Local Access Streets in 2022 and 2023 between 07:00 and 19:00 hours on a weekday



The volume of taxis on Mark Lane is very similar to Queen Victoria Street and Poultry. It should be noted that when the WSP survey work was undertaken before taxis were permitted (on an experimental basis) to travel through the Cheapside bus gate restrictions and before the taxi rank on Poultry outside the Ned hotel was installed. Both of these interventions are expected to lead to an increase in taxis on Poultry during the restricted times.

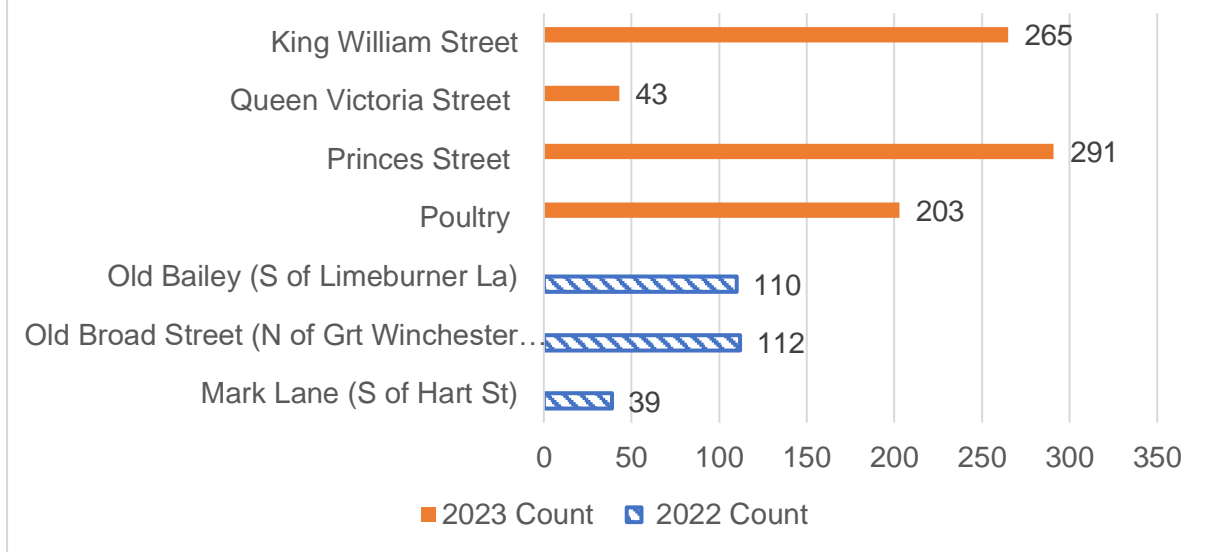
The data suggests that Old Bailey is used by more taxis than Princes Street between 07:00 and 19:00. 106 more taxis were counted on Old Bailey over the twelve-hour period, on average this is equivalent to nine additional taxis an hour.

Old Broad Street is also used by more taxis than King William Street between 07:00 and 19:00. 106 more taxis were counted on Old Broad Street over the twelve-hour period, on average this is equivalent to nine additional taxis an hour.

#### After 19:00

As some of the arms of Bank are open to traffic after 19:00 it is worth looking at the last 6 hours of the 2023 data and the last 12 hours of the 2022 data.

### Comparing different local access Street taxi volumes between 19:00 and 07:00/01:00



Queen Victoria Street, which is closed to motor traffic 24 hours a day (at Bank), and Mark Lane have very similar volumes as they have the same typology throughout the day.

Both Old Bailey and Old Broad Street, have a much lower volume of taxis when compared with King William Street, Poultry and Princes Street. Even if we were to assume that all of these taxis on Old Broad Street and Old Bailey occurred before 0100, these volumes are nearer the volumes of taxis on Poultry and King William Street during the day.

#### Conclusion

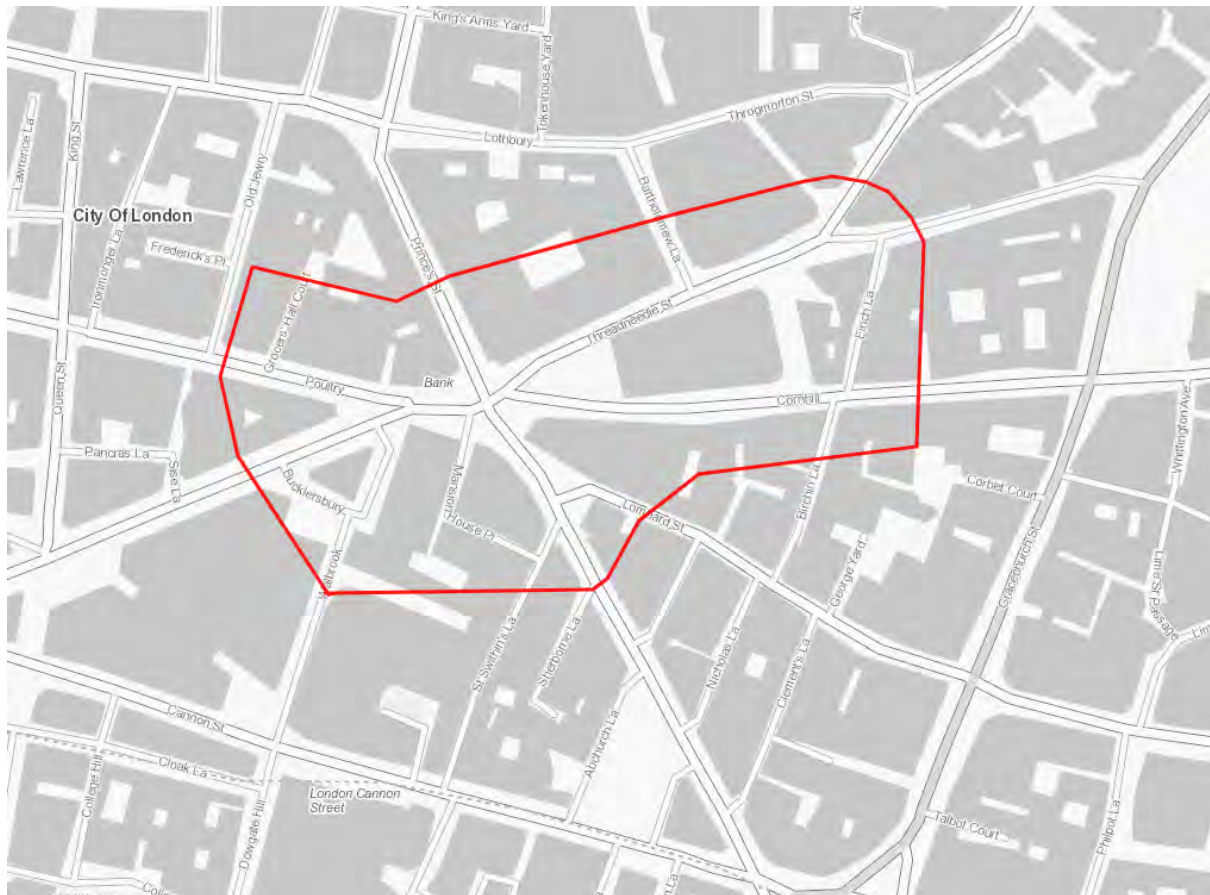
Although based on a small sample of streets, the data suggests that taxi volumes on the approaches to Bank are comparable with similar local access streets.

The most significant differences during 07:00 and 19:00, when the Bank restrictions are in effect, are an average of an additional nine taxis an hour on Old Bailey, compared to Princes Street, and Old Broad Street, compared to King William Street. This situation reverses after 19:00 when there are more taxis using Princes Street and King William Street compared with Old Bailey and Old Broad Street.

## Appendix 7

### Casualty/Collision information

The area considered as Bank Junction when looking at collision information for the project



**Table 1: the number of Collisions and casualties at Bank Junction each year from 2014 to the end of 2022**

	Collisions			Casualties	
	At All times	M-F: 7am to 7pm only		At All times	M-F: 7am to 7pm only
2014	23	15		29	19
2015	14	9		15	10
2016	20	10		22	12
2017	17	12		20	13
2018	18	8		19	8
2019	17	8		19	9
2020	2	2		2	1
2021	12	9		13	10
2022	7	3		7	3

**Table 2 – casualties vs time and day in 2021**

Casualties	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
7am to 7pm (during restriction times only)	3	3	1	2*	1	0	0
at all other times (excluding the restricted times)	0	1	0	1		1	0
<b>Total</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>0</b>

Total of 13 casualties of which 2 were \*serious.

**Table 3- casualties vs time and day in 2022**

Casualties	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
7am to 7pm (during restriction times only)	0	0	0	1	2*	0	0
at all other times (excluding the restricted times)	1	1	1	1	0	0	0
<b>Total</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>

Total of 7 casualties of which 1 was \*serious

**Data for 2023 is only available until 30 November 2023**

Information to date:

**Table 4 – The number of collisions and casualties at Bank Junction so far in 2023**

	Collisions to date			Casualties to date	
	At All times	M-F: 7am to 7pm only		At All times	M-F: 7am to 7pm only
2023	1	1		1	1

**Table 5 casualties vs time of day so far in 2023**

Casualties	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
7am to 7pm (during restriction times only)	0	0	1	0	0	0	0
at all other times (excluding the restricted times)	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Total of 1 casualty of which 0 were serious.

# Casualty by Involved Vehicle Types



Select date range

01/01/2019 30/11/2023

[Click to view explanation](#)

Select one or more casualty severity

Select all Fatal Serious Slight

Select borough(s) of collision

City Of London

Select casualty mode of travel

All

Select vehicle type involved

All

Select casualty age band

All

Select casualty sex

Select all  
 Unknown  
 Male  
 Female

Select street speed limit

All

Vehicle involved casualty count: casualty mode of travel (rows), vehicles involved in collision (columns)

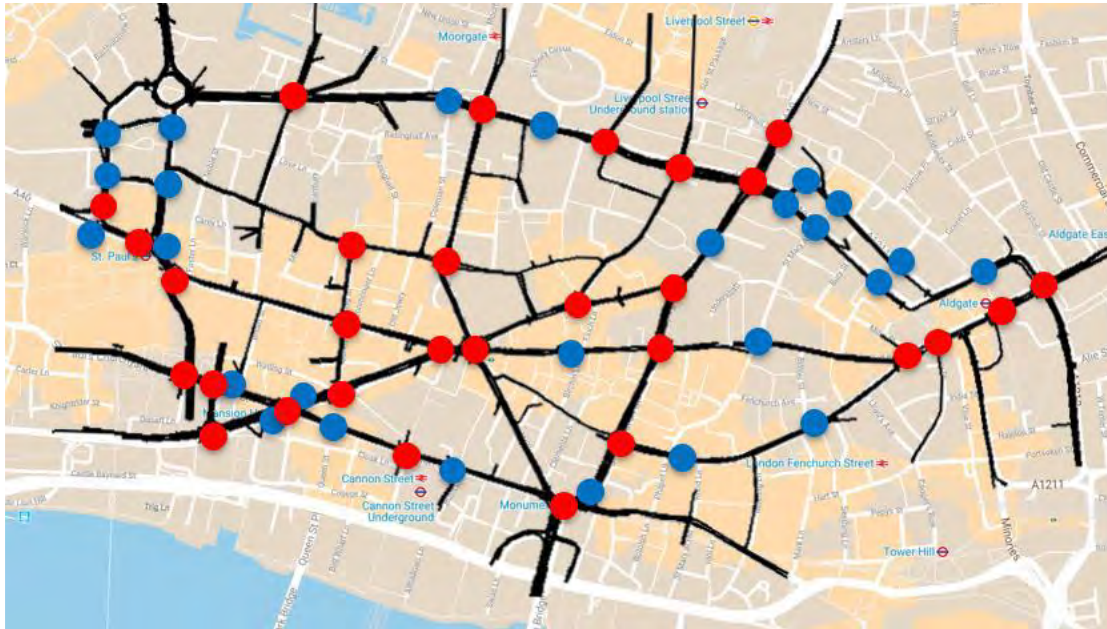
Casualty Mode of Travel	Pedal Cycle	Powered 2 Wheeler	Car	Taxi	Private Hire	Bus Or Coach	Goods Vehicle	Other Vehicle
Pedestrian	62	34	56	34		27	36	7
Pedal Cycle	43	21	48	96	1	17	78	6
Powered 2 Wheeler	9	9	50	39		5	28	2
Car		1	42	9		2	10	
Taxi	1		24	12		4	1	
Bus Or Coach	1		3	1		1	1	
Goods Vehicle			2			1	3	
Other Vehicle	1	1	8	1		1	2	
Private Hire			1				2	

Selected collision details

_Collision Id	Date	Time	Borough Name	Casualty Mode of Travel	Casualty Severity	Vehicle Involved	Speed Limit (Banded)	Highway Authority	Junction Control	Junction Detail	We
48190928016	09/01/2019	12:07	City Of London	Pedestrian	Slight	Powered 2 Wheeler	<= 20 MPH	TLRN	Give Way/Uncontrolled	T/Stag Jun	Fin
48190821031	10/01/2019	16:45	City Of London	Pedestrian	Slight	Powered 2 Wheeler	<= 20 MPH	TLRN	Give Way/Uncontrolled	T/Stag Jun	Fin
48190827447	10/01/2019	19:05	City Of London	Pedal Cycle	Slight	Pedal Cycle	<= 20 MPH	TLRN	Auto Sig	Crossroads	Fin
48190827447	10/01/2019	19:05	City Of London	Pedal Cycle	Slight	Taxi	<= 20 MPH	TLRN	Auto Sig	Crossroads	Fin
48190827417	11/01/2019	15:30	City Of London	Pedal Cycle	Slight	Pedal Cycle	<= 20 MPH	TLRN	Auto Sig	Crossroads	Fin
48190827417	11/01/2019	15:30	City Of London	Pedal Cycle	Slight	Goods Vehicle	<= 20 MPH	TLRN	Auto Sig	Crossroads	Fin

## Appendix 8

Figure 1: Area included in the Bank junction traffic model



The red dots represent signalised junctions and the blue dots show priority junctions that have been included in the traffic model.

The size of the model is a consequence of it being developed to test, both individually and in combination, the City Cluster schemes and All change at Bank schemes during the design development of All Change at Bank in 2020/2021.

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**From:** Janet Leatherland [REDACTED]  
**Sent:** Monday, April 15, 2024 2:27 PM  
**To:** Policy & Projects <Policy.Projects@cityoflondon.gov.uk>  
**Cc:** Pete Wood [REDACTED]  
**Subject:** BANK JUNCTION TAXI ACCESS  
**Importance:** High

THIS IS AN EXTERNAL EMAIL

Hi

I write on behalf of the Owners and Managers of The Royal Exchange, a luxury retail destination in the heart of the City with a number of food and drink operators open until 11pm as well as events such as weddings and parties over the weekend, it is vital for our customers to be able to book and hail taxi's to pick them up from outside The Royal Exchange.

Our customers report that getting a taxi at Bank Junction is incredibly challenging, which puts them off visiting or hosting events with us.

The safety of our guests, particularly those travelling alone who want to travel home in a taxi is also incredibly important to us and we want to offer all ranges of transport to our guests.

Allowing taxi's through Bank Junction would alleviate that issue and ensure the continued success of The Royal Exchange and others around it.

Many thanks

Janet

Janet Leatherland  
Centre Director  
The Royal Exchange

Management Suite, 3 Royal Court, London, EC3V 3LN  
T : 0203 861 6500  
M : [REDACTED]  
E : [REDACTED]



THE  
Royal  
Exchange  
SINCE 1571

**From:** Charles Begley [REDACTED]  
**Sent:** Monday, April 22, 2024 3:34 PM  
**To:** Magliocco, Luciana [REDACTED]; Gareth Roberts [REDACTED]; Ross Sayers [REDACTED]  
**Cc:** Howard, Gillian [REDACTED]; Poulter, Kate [REDACTED]; Depala, Bhakti [REDACTED]; Andrea.Williams [REDACTED]  
**Subject:** CPA: Bank Junction plans - submit your business view

THIS IS AN EXTERNAL EMAIL

Dear Luciana,

Thank you for your email below. We are grateful for the opportunity to resubmit the CPA's views regarding *All Change at Bank* as part of your review into the project, which will be considered by the Streets & Walkways Sub Committee and Planning & Transportation Committee on 14 and 16 May respectively.

As Gareth indicated in his previous response (taken out of the chain to reduce long chains), we set out our position in the attached letter on 5 January in response to the Transport Strategy. The points made are still relevant and helpfully link **All Change at Bank** to the wider objectives of the strategy, so we are content this is used to help inform your review. I have copied the most relevant text below for ease, highlighting the direct reference to the project itself. In a nutshell, we remain supportive of the project and have been since its inception. If anything, as you can see from our response, we would urge even more ambition.

I hope that helps, but please do not hesitate to contact me or my colleague Andrea if you or any of the team managing this wish to discuss further or have any questions. I'm also looping in our incoming Chair Ross Sayers who will be picking up the mantle from Gareth at our AGM on 30 April. You, Gillian and Kate would be most welcome to attend (alongside Bhakti who has already registered) our AGM evening reception that day if you are available. The details can be found [here](#).

Kind regards  
Charles

The appeal of the City as a destination and an attractive place to visit is fundamental to its ongoing success and is at the heart of 'Destination City'. As we set out in our [Visualising Destination City](#) report in October 2023, transformative public realm has a key role to play in delivering the City Corporation's Destination City ambitions. We specifically wish to draw your attention to the map contained in our Vision document as we believe it shows the opportunity to be even more ambitious in transforming the City.

By activating the City's streets and public spaces and ensuring they are attractive, welcoming and pleasurable places to dwell and travel, the City will be able to fully realise its vision of becoming a thriving cultural, commercial and leisure hub. On this, the City of London Corporation has the CPA's emphatic support.

Given that the City of London's workforce is expected to grow by 85,000 by 2040 according to estimates based on GLA data and office attendance may also continue to 'move upwards' (*City of London Corporation Future of Office Use* report, Knight Frank & Arup), it is right that ensuring there is sufficient space available to accommodate additional people moving around the Square Mile remains a key priority of the Strategy. As 90% of on-street journeys originating or finishing within the City are entirely or partially walked, we welcome the continued focus on improving the pedestrian experience for people who work, visit and live in the area.

## New and enhanced public realm

For reasons stated above, we are enthusiastic about proposal 7 to provide more public space in the City. Traffic reductions seen over the last few years provide the ideal opportunity to free up and reallocate space once used for car parking and traffic to create new and vibrant public spaces. CPA would like to see the City Corporation go further, including pedestrianising streets with low traffic volumes where appropriate – making them more accessible for those walking and wheeling, as well as providing greater opportunities for a wide range of leisure uses, such as alfresco dining. This will help the City Corporation achieve its Destination City vision.

To this end we strongly welcome suggestions to explore restrictions on vehicular traffic, including taxis, on a case by case basis. We urge the continuation of these restrictions at Bank Junction which has only very recently seen the completion of its long planned public realm works. Whilst we understand a very small number of people feel this is inconvenient, we would urge the City to take into consideration wider views and give the newly delivered scheme more time to bed in. Whilst it is not as ambitious as we would have liked to have seen delivered, it is still transformative for the area and rowing back now the junction is operational would be a retrograde step after 6+ years of the current restrictions.

People value working, visiting and living in the City for its public amenities, and additional public space will be needed to respond to the City's planned growth and Destination City ambitions. Where funding isn't readily available for a long term transformation of the City's streets. CPA fully supports the creation of new public spaces through temporary means to highlight the benefits that could be achieved if a long-term scheme were implemented.

**Charles Begley** | Chief Executive

### **London Property Alliance**

City Property Association | Westminster Property Association

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[citypropertyassociation.com](#) | [westminsterpropertyassociation.com](#) | [londonpropertyalliance.com](#)

**From:** Gareth Banner [REDACTED]  
**Sent:** Thursday, April 25, 2024 6:41 PM  
**To:** Policy & Projects <[Policy.Projects@cityoflondon.gov.uk](mailto:Policy.Projects@cityoflondon.gov.uk)>  
**Cc:** Howard, Gillian [REDACTED]; Poulter, Kate [REDACTED]; Depala, Bhakti [REDACTED]; Magliocco, Luciana [REDACTED]  
**Subject:** RE: Bank Junction plans - submit your business view

THIS IS AN EXTERNAL EMAIL

To whom it may concern,

I am delighted to know that the City Corporation is reviewing the traffic restrictions at Bank Junction. As a business which occupies a unique footprint on both Poultry and Princes Street (the western end of our building sits outside of the restriction zone, whilst the eastern end is located beyond the restricted area), I would hope that my considerations will be debated at the Streets & Walkways Sub Committee on 14 May and the Planning & Transportation Committee on 16 May.

I would also be very happy to elaborate on any of the points summarised below in greater detail should it be deemed necessary or helpful. For the purposes of conciseness, I summarise as follows:

- As explained in 2017, the premise for restricting vehicle access was on the grounds of (1) air quality and (2) safety. My response to these arguments is as follows:
  - I fully support restricted access for lorries and other commercial / logistic vehicles in addition to personal vehicles, during the hours of 7am – 7pm, Monday to Friday.
  - I **do not** support, nor do I understand the rationale for restricting registered London taxis (Black Cabs) during these hours. As the records show, there has never been a fatality recorded on Bank Junction as a result of a collision with a taxi and therefore it is hard to justify that these vehicles pose a high safety risk.
  - As we have all witnessed, electric vehicles have become far more common around London and this is also true of Black Cabs. In fact, it is many years since anything other than EV taxis have even been available to purchase and it will not be long before only EV taxis exist on the streets of London. To this end, taxis barely impact on air quality today and any impact from those vehicles that are still powered by an internal combustion engine are diminishing by the week.

There are also much broader arguments about making the City accessible and welcoming to all that choose to visit, but I know that Luciana Magliocco of Destination City will be able to make this point far more eloquently than me.

With kind regards,

Gareth

**Gareth Banner** | Group Managing Director

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27 February 2024

Mr Shravan Joshi  
Chairman

Finance Committee  
City of London Corporation  
London

EC2P 2EJ

Dear Shravan,

### **BLACK CABS ACCESS**

On behalf of the City of London Chamber of Commerce, may I please request your consideration to fast track the proposals for a pilot so that the City can have access to black cabs.

We welcome your decision that a proposal for black cabs to have access to Bank Junction would be presented in June.

However, the City of London Chamber Committee has expressed severe concerns that under this timetable, a pilot will not occur until late 2025 or even 2026.

The Committee considers that such a delay is hampering the ambitions of the Corporation to be internationally recognised as a Destination City.

Unlike other global financial hubs, the City - under the current timetable - will remain the only global business centre without full access to all public transport modes until late 2025 or 2026. This problem continues to damage the international perception of our City as a welcoming and accessible business and tourism centre.

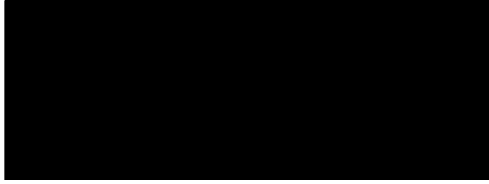
The Committee highlighted another pivotal issue as to why this matter needs to be fast tracked. Black cabs are critical for people who have various disabilities.

The Committee heard example after example of people with disabilities struggling to get around the City of London due to the lack of black cab access. I recognise you are aware of this issue. Nonetheless, if it is helpful, we can provide these case studies so that urgent action is taken on this matter.

Your officers had previously told an officer of this Chamber that delays at Transport for London (TfL) could hold up the pilot until late 2025. We have gained assurances from TfL since then that any request from the Corporation for this pilot to progress will be efficiently processed by them. To date, no application for a pilot has been submitted to TfL by the Corporation.

I and the City of London Chamber of Commerce Committee appreciate your consideration of this matter and we look forward to your response.

Yours sincerely,



**Alderman Prem Goyal**  
Chairman  
City of London Chamber of Commerce

<b>Committee(s):</b> Streets and Walkways Sub (Planning and Transportation) Committee	<b>Dated:</b> [Insert date as DD/MM/YYYY}
<b>Subject: Pedicabs (London) Bill 2024</b>	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	N/A
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	£-
<b>What is the source of Funding?</b>	-
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of: Remembrancer</b>	<b>For Information</b>
<b>Report author: Philip Saunders, Parliamentary Affairs Counsel</b>	

## Summary

The Bill empowers Transport for London (TfL) to make regulations concerning pedicabs operating in Greater London.

## Recommendation(s)

Members are asked to: Note this Report.

## Main Report

### Background

1. By a quirk of the Victorian legislation on which the regulation of taxis is based, pedicabs in London are considered to be stage carriages. This is because legislation relating to hackney carriages has been modernised and the remaining but nearly redundant law has left a definition of stage carriages as, broadly, modes of conveyance that charge passengers separate fares and that ply for hire in public streets, roads or place in London. The result is that privately hired pedicabs operating in London are unregulated.
2. Cities of London and Westminster MP Nickie Aiken championed the regulation of pedicabs through a Private Member’s Bill. The government accepted the merits of regulating pedicabs in London and drafted its own Bill.
3. Westminster City Council, the Local Government Association and Transport for London welcomed the measures.

### Current Position

4. The Bill gives TfL powers to regulate pedicabs and licence companies that operate pedicabs. Under the provisions, drivers and their vehicles may be

licensed and pedicab drivers may be required to undergo criminal record or right to work checks. Initially, the Bill required TfL to seek government approval for any regulations it wished to introduce. During the Bill's passage, however, the government removed that requirement with the result that TfL will be able to independently produce regulations. The final position is that pedicab regulation-making will be in line with TfL's taxi and private hire vehicle regulation-making procedures which do not require parliamentary approval.

5. Peers discussed the breadth of potential regulations and were told the scope was wide and could include provisions about drivers making too much noise and protection of children. In the final debate in the Commons, the minister was questioned by MPs concerned that TfL might regulate in a way that prohibited pedicabs from plying for hire (rather than waiting at ranks), but the minister could only say that was a matter for TfL.
6. The Bill states that TfL must have regard to any guidance issued by the Secretary of State.
7. In response to extensive discussions about the definition of 'pedicab', the government altered the Bill to ensure that vehicles that have passenger seating in-front, behind, or at the side will be within the scope the provisions. Pedalled and motor-driven pedicabs will be subject to regulation. Peers expressed some concern that future regulations might capture situations such as carers cycling with children in child seats, but were told that such journeys would not, of themselves, be for private hire or reward.
8. TfL will be able to charge for the administration of licence applications, set fees and make regulations about fares. TfL will have a power to place restrictions on pedicab operations, including the number of pedicabs in operation in specified places or at specified times. For instance, the powers would allow TfL to create pedicab ranks (similar to taxi ranks). Under the Bill, TfL may authorise others to conduct enforcement activities.
9. Punishment for breach of pedicab regulations will be by a fixed penalty notice or prosecution in the magistrates' court. Fines in the magistrates' court will be limited to a maximum £2,500 fine. TfL will have powers of seizure, retention, and disposal.

## **Conclusion**

10. The Act, which applies to pedicabs within Greater London, including the City of London, came into force on 25 April 2024.

**Philip Saunders**  
**Parliamentary Affairs Counsel**  
**02073321201**  
**Philip.saunders@cityoflondon.gov.uk**



<i>Date</i>	<i>Action</i>	<i>Officer responsible</i>	<i>To be completed/ progressed to next stage</i>	<i>Notes/Progress to date</i>
15 October 2020 1 December 2021 18 February 2021 08 July 2021 10 Sep 2021 15 Feb 2022 03 May 2022 31 May 2022 05 July 2022 08 Nov 2022 17 Jan 2023 7 March 2023 23 May 2023 4 July 2023 26 September 2023 7 November 2023 30 January 2024 19 March 2024	<b><u>Dockless Vehicles</u></b> To keep the Sub Committee informed of activities to manage the use of dockless cycles and e-scooters in the Square Mile and any related issues.	Executive Director, Environment	April 2021 Sep 2021 Dec 2021 Feb 2022 Sep 2022 Nov 2022 Mar 2023 May 2023 July 2023 26 September 2023 30 January 2024 19 March 2024	Officers have met with dockless operators to update them on the new operating requirement agreed at the January 2024 meeting of S&W. Officers are following up in writing to formalise the arrangements. Sites for additional contained parking are being identified for better parking for all dockless. We have provided comments to TfL on the draft specification of the upcoming micromobility contract.  A paper on this topic is on the P&T agenda for 16 May.
<i>Date</i>	<i>Action</i>	<i>Officer responsible</i>	<i>To be completed/ progressed to next stage</i>	<i>Notes/Progress to date</i>
31 May 2022 17 Jan 2023 7 March 2023 23 May 2023 4 July 2023 26 Sept 2023 7 November 2023 18 January 2024 19 March 2024 02 May 2024	<b><u>Bank Junction Traffic &amp; Timings Review</u></b>	Executive Director, Environment	Sep 2022 Nov 2022 Jan 2023 March 2023 May 2023 June 2023 July 2023 Sept 2023 May 2024	Following the decision of the Court of Common Council in July, work is progressing on the next phase of the review, with a request for a progress report to be received by the Court in December 2023 which was met.  The final report on the review is on this agenda for May 2024 S&W and P&T committees,.

<i>Date</i>	<i>Action</i>	<i>Officer responsible</i>	<i>To be completed/ progressed to next stage</i>	<i>Notes/Progress to date</i>
14 May 2024	<u>Reopening of Old Jewry</u>	Executive Director, Environment		<p>Following the decision in March 24 to proceed with a new experimental traffic order on Old Jewry, draft documentation for the traffic orders and required Equalities and Road Safety Audit documents have been undertaken.</p> <p>It is anticipated that the experiment will be operational by the end of June.</p>