



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

**Date:** TUESDAY, 31 MAY 2022

**Time:** 10.30 am

**Venue:** COMMITTEE ROOM 1 - 2ND FLOOR WEST WING, GUILDHALL

**Members:**

Deputy Graham Packham (Chairman)	Deputy Edward Lord Judith Pleasance
John Edwards (Deputy Chairman)	Deputy Susan Pearson
Deputy Shravan Joshi	Ian Seaton
Deputy Randall Anderson	Alderman Ian Luder, Open Spaces and City Gardens Committee (Ex-Officio Member)
Deputy Marianne Fredericks	Paul Martinelli, Finance Committee (Ex- Officio Member)
Deputy Alastair Moss	

**Enquiries:** Jayne Moore  
Jayne.Moore@cityoflondon.gov.uk

### Accessing the virtual public meeting

**Members of the public can observe this the public part of the meeting here:**

<https://youtu.be/iqfy1DCOwLs>

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**John Barradell**  
Town Clerk and Chief Executive

# **AGENDA**

## **Part 1 - Public Agenda**

1. **APOLOGIES FOR ABSENCE**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 03 May 2022.

**For Decision**  
(Pages 5 - 10)

4. **100 FETTER LANE S278**

To consider the report of the Executive Director Environment.

**For Decision**  
(Pages 11 - 24)

5. **WOOD STREET POLICE STATION S278**

To consider the report of the Executive Director Environment.

**For Decision**  
(Pages 25 - 32)

6. **ALL CHANGE AT BANK**

To consider the report of the Executive Director Environment.

**For Decision**  
(Pages 33 - 58)

7. **ALL CHANGE AT BANK - TRAFFIC ORDERS OBJECTION REPORT**

To consider the report of the Executive Director Environment.  
NB: Appendix 5 is non-public.

**For Decision**  
(Pages 59 - 154)

8. **LEADENHALL STREET TRAFFIC MANAGEMENT- EASTERN CITY CLUSTER**

To consider the report of the Executive Director Environment.

**For Decision**  
(Pages 155 - 174)

9. **60 LONDON WALL S278**

To consider the report of the Executive Director Environment.

**For Decision**  
(Pages 175 - 186)

10. **CITY CLUSTER VISION - WELL-BEING & CLIMATE CHANGE RESILIENCE:  
JUBILEE GARDENS IMPROVEMENTS**

To receive the report of the Executive Director Environment.

**For Information**  
(Pages 187 - 202)

11. **OUTSTANDING REFERENCES**

Report of the Town Clerk.

**For Information**  
(Pages 203 - 206)

12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB  
COMMITTEE**

13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

14. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act as follows:-

**Part 2 - Non-public Agenda**

15. **NON-PUBLIC MINUTES**

To agree the non-public Minutes of the meeting held on 03 May 2022.

**For Decision**  
(Pages 207 - 208)

16. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**



## **STREETS AND WALKWAYS SUB (PLANNING AND TRANSPORTATION) COMMITTEE**

**Tuesday, 3 May 2022**

Minutes of the meeting of the Streets and Walkways Sub (Planning and Transportation) Committee held at Committee Room 3 - 2nd Floor West Wing, Guildhall on Tuesday, 3 May 2022 at 10.30 am

### **Present**

#### **Members:**

Deputy Graham Packham  
Deputy Randall Anderson  
Deputy Marianne Fredericks  
Deputy Alastair Moss  
John Edwards  
Deputy Edward Lord  
Judith Pleasance  
Deputy Susan Pearson  
Alderman Ian Luder (Ex-Officio Member)

#### **Officers:**

Ian Hughes	- Environment Department
Olumayowa Obisesan	- Environment Department
Gillian Howard	- Environment Department
Shani Annand-Baron	- Town Clerk's Department
Kristian Turner	- Environment Department
Melanie Charalambous	- Environment Department
Clarisse Tavin	- Environment Department
Giles Radford	- Environment Department
Bruce McVean	- Environment Department
Jayne Moore	- Town Clerk's Department

### **1. APOLOGIES FOR ABSENCE**

Apologies were received from Deputy Shravan Joshi, and from Ian Seaton.

### **2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

### **3. ELECTION OF CHAIRMAN**

In accordance with Standing Order no. 29, Deputy Graham Packham was elected Chairman for the ensuing year. No other expressions of interest were received.

The Committee congratulated Deputy Graham Packham on his election, and the newly-elected Chairman thanked the Committee for their support.

The Chairman welcomed new members to the Committee: Alderman Ian Luder, Deputy Edward Lord, Susan Pearson, Judith Pleasance, and Ian Seaton. The Chairman also thanked departing members for their service: Peter Bennett, Christopher Hill, Jamie Ingham Clark, Oliver Sells, and John Tomlinson.

**4. ELECTION OF DEPUTY CHAIRMAN**

In accordance with Standing Order no. 30, John Edwards was elected Deputy Chairman for the ensuing year. No other expressions of interest were received.

The Committee congratulated John Edwards on his election.

**5. TERMS OF REFERENCE AND MEMBERSHIP**

The Committee received the report of the Clerk.

**6. MINUTES**

**RESOLVED**, That the public minutes of the meeting of 15 February 2022 be approved as an accurate record of the proceedings, noting that Deputy Marianne Fredericks had attended the meeting via Teams following its change of start time.

The newly-elected Deputy Chairman noted that he would be monitoring legibility of Barbican Highwalk signage (item 19 of minutes of 15 February 2022).

A Member asked for an update on Item 8 of the minutes of 15 February 2022 (motorcycle parking bay on old Jewry), and the meeting heard that, following a consultation exercise, two responses had been submitted that were broadly favourable and that one of the Pay & Display bays was to be allocated to motorcycle parking (as previously agreed by the Committee).

**7. COOL STREETS AND GREENING PROGRAMME: CITY GREENING AND BIODIVERSITY PROJECT**

A Member commented that the project should aim to level up what appeared to be an uneven provision of green space in the City, and that such an aim should be added as a factor in decision-making around where to site trees.

A Member asked for residents to be consulted on the project, and for new bids to be involved.

A Member asked whether the Committee was involved in planting in City gardens, and the Committee heard that responsibility for City garden-planting presently lay within the realm of the Open Spaces & City Gardens Committee.

A Member asked whether the St Peter Cheap green space (Wood St/Cheapside) would be renovated as planned. The Committee heard that a planting and seating review was being considered for that space.

A Member asked about the timeframe for information about whether the current blockage of the roadway at Finsbury Circus would become parking space. The Committee heard that feedback on a site visit planned to take place in early May would be provided.

A Member commented that a masterplan would be helpful, that more pop-up green spaces would be welcome, and that further work with building managers/owners would be useful in the management of open spaces.

The meeting heard that a masterplan would be submitted to future meetings, and that partnerships were being rolled out.

A Member asked whether owners of private land were being encouraged to nurture green spaces, and the meeting heard that private landowners were being strongly encouraged to continue their involvement with green space designs.

A Member asked what public realm areas could be enhanced, and what priorities might lie within such areas. The meeting heard that criteria considerations were being drawn up as part of a Gateway 3-4 report, and that trees would be planted during the October to March planting season.

A Member asked for clarification on the Urban Greening Factor (referenced on p.24 of the agenda pack), and on the risks around large trees potentially damaging nearby older buildings.

The Committee heard that the Urban Greening Factor was to be used to a greater extent, that potential achievements varied greatly, and that realistic targets were being drawn up. The Committee noted that foundation protection was a risk but that planting was done carefully to take into account nearby structures.

A Member asked whether the criteria could be submitted to the Committee ahead of any planting, and the meeting heard that some criteria could be submitted.

A Member asked whether there was any scope for greater ambition that could encompass sponsorship, and the meeting heard that further studies would be required to increase the 100-tree minimum, and that maintenance was a key consideration.

**RESOLVED, That the Committee**

1. Approve the commencement of the project;
2. Approve the release of £80,000 from the Cool Streets and Greening programme for staff costs, fees and site investigations to reach the next gateway;
3. Note that delivery will be phased across 3 years with an initial Gateway 5 (Chief Officer approved) report in autumn 2022 to enable tree-planting to take place in the next planting season;

4. Note the total estimated cost of the project at £1.5-2.5m.

**8. CITY CLUSTER VISION - WELL-BEING & CLIMATE CHANGE RESILIENCE: JUBILEE GARDENS IMPROVEMENTS**

The Committee received the report of the Executive Director Environment.

A Member asked what consideration had been given to skateboarding, and the meeting heard that skateboarding had been taken into account in design plans to make the area less appealing to skateboarders.

A Member commented on the appeal of 'cigarette flowers', and asked for clarification on the provision of rubbish bins, and the meeting heard that it was likely that a further bin would be added.

A Member asked whether Yorkstone would continue to be used over and above permeable paving, taking into account absorption capabilities and skateboarding appeal. The meeting heard that permeable paving was sub-optimal because of underlying materials, though mixed paving was an option being considered.

A Member asked whether there would be enough seating, bearing in mind the curves. The meeting heard that some existing benches could be used and that there was enough straight edge to accommodate a range of seating options with no loss of seating.

**9. OUTSTANDING REFERENCES**

The meeting received the Outstanding References, and noted that any discussion related to Beech St would take place in private session due to the local elections taking place on 05 May 2022 and the involvement of the London Borough of Islington in the matter.

A Member asked whether accident figures relating to scooters were available, and the meeting heard that accident figures could be provided in July 2022. A Member commented that potholes and grills were a significant hazard, and that dockless vehicle parking continued to be an issue.

A Member asked for clarification on wider consultation around Beech Street, and the meeting heard that consultation was expected to be launched at the end of May 2022.

A Member sought clarification on the existence of plans for when Tower Bridge was closed, and pointed out that it was likely that a new Chinese Embassy would be created at the former Royal Mint site that was likely to attract attention. The meeting heard that the risk of spontaneous demonstrations was an ongoing issue across the Square Mile and that the dynamic response to disruption was well-organised in conjunction with City of London Police.

A few Members expressed concern around potential damage to Tower Bridge, and a Member asked whether there was merit in encouraging vehicles to use Southwark Bridge during diversions rather than the less robust Tower Bridge,

notwithstanding a greater risk of disruption due to demonstrations. The meeting heard that concerns around risks to Tower Bridge had been expressed to TfL, that further reports would be submitted on TfL's findings, and that enforcement by Southwark was proving to be effective.

**10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

A Member asked for clarification on aspirations and an overarching articulation of the vision for Bank Junction that has included the creation of a piazza space in the area (which would involve re-routing buses), and commented that internal Corporation resources needed to be assessed.

A Member commented on the importance of clear road signage in the area and the role of signage positioning in avoiding any interruption to their legibility.

The meeting heard that a meeting on 31 May would encompass a deep dive into Bank Junction plans and heard an overview of design plans submitted so far, a major deliverable being more pedestrian space.

A Member commented on the appeal of illuminated cycle lanes in other places that used sunlight to charge. The meeting heard that dedicated space in the City was limited, and consideration was being given to reducing traffic to enhance the cycling experience among other things.

**11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

The meeting heard that the Chairman of the parent Committee would attend the Considerate Contractor Award event later in the month.

**12. EXCLUSION OF THE PUBLIC**

**RESOLVED,** That Members agree to exclude the public.

**The meeting ended at 12.30**

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Chairman

Contact Officer: Jayne Moore  
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Jayne.Moore@cityoflondon.gov.uk

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<b>Committees:</b> Corporate Projects Board - for decision Operational Property and Projects Sub - for decision Streets & Walkways Sub – for decision	<b>Dates:</b> 11 May 2022 30 May 2022 31 May 2022
<b>Subject:</b> 100 Fetter Lane s278  <b>Unique Project Identifier:</b> 12348	<b>Gateway 2:</b> <b>Project Proposal</b> Light
<b>Report of:</b> Director of the Built Environment <b>Report Author:</b> Nick Howdle-Smith	<b>For Decision</b>
<b>PUBLIC</b>	

## Recommendations

<b>1. Next steps and requested decisions</b>	<p>Project Description: Highway and Public Realm improvement works in the vicinity of the development at 100 Fetter Lane.</p> <p>Next Gateway: Gateway 5 - Authority to Start Work (Light)</p> <p>Next Steps:</p> <ul style="list-style-type: none"><li>• Entering into the S.278 agreement with the developer.</li><li>• Design development and stakeholder engagement prior to the Gateway 5 report.</li></ul> <p>Requested Decisions:</p> <ol style="list-style-type: none"><li>1. That budget of £50,000 is approved to reach the next Gateway, fully funded from a Section 106 agreement;</li><li>2. Note the total estimated cost of the project at £200,000 (excluding risk);</li><li>3. Authorise officers to enter into a Section 278 agreement with the developer.</li></ol>											
<b>2. Resource requirements to reach next Gateway</b>	<table><tr><th>Item</th><th>Reason</th><th>Funds/ Source of Funding</th><th>Cost (£)</th></tr><tr><td>Staff costs</td><td>Project Management, and Stakeholder Engagement</td><td>S.278 (Design &amp; Developm</td><td>£30,000</td></tr></table>				Item	Reason	Funds/ Source of Funding	Cost (£)	Staff costs	Project Management, and Stakeholder Engagement	S.278 (Design & Developm	£30,000
Item	Reason	Funds/ Source of Funding	Cost (£)									
Staff costs	Project Management, and Stakeholder Engagement	S.278 (Design & Developm	£30,000									

			ent Fee (receipted)	
	Staff costs	City of London Highways Engineer	S.278 (Design & Developm ent Fee (receipted)	£10,000
	Fees	Topographical survey, GPR survey, site investigations, highways permits	S.278 Design & Developm ent Fee	£10,000
	<b>Total</b>			£50,000
<b>Costed Risk Provision requested for this Gateway: £0</b> (as detailed in the Risk Register – Appendix 2)				
<b>3. Governance arrangements</b>	<ul style="list-style-type: none"> <li>• Service Committee: Streets and Walkways Committee</li> <li>• Senior Responsible Officer: Tom Noble, Group Manager, City Public Realm</li> <li>• The project has low reputational risk. Additional project governance not required</li> </ul>			

### Project Summary

<b>4. Context</b>	<ol style="list-style-type: none"> <li>1. A planning permission to demolish and redevelop an office building and public house at 100/108 Fetter Lane (21/00454/FULMAJ) was granted on 29th September 2021.</li> <li>2. The new pedestrian activities attracted to the development necessitates improvements to the street environment ensuring enhanced safety and attractiveness for road users aswell as reparations to existing highway resulting from the construction works.</li> <li>3. The proposed site lies within the Fleet Street Business Improvement District.</li> </ol>
<b>5. Brief description of project</b>	<ol style="list-style-type: none"> <li>1. Improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement</li> <li>2. Works to tie the new building line and new route into the public highway on Mac's Place</li> </ol>



	<ul style="list-style-type: none"> <li>3. Public highway lighting improvements</li> <li>4. Provision of an on-street blue badge parking space within the vicinity of the site</li> <li>5. Footway surrounding the site to be repaired post construction and be replaced with Yorkstone</li> <li>6. Cycle improvements to allow access to on site cycle parking facility</li> </ul>
<b>6. Consequences if project not approved</b>	<ul style="list-style-type: none"> <li>1. There would be no mechanism through which the highway changes required to accommodate the development can be delivered and the developer will be in breach of their Section 106 covenant if they are unable to enter into a Section 278 agreement providing for the highway improvement works.</li> <li>2. Lack of dropped kerb / crossing facilities would disadvantage road users with impaired mobility</li> <li>3. The public realm / materials surrounding the new development would not meet the requirements of the CoL Local Plan and supplementary planning documents</li> <li>4. Lack of cycling/pedestrian upgrades would not encourage shift to sustainable transport modes</li> <li>5. Highways that are not maintainable to agreed CoL standards</li> </ul>
<b>7. SMART project objectives</b>	<ul style="list-style-type: none"> <li>1) Improvements for walking and cycling in the proximity of the development</li> <li>2) Improvements to the attractiveness of the public realm in the proximity of the development in line with the CPR Supplementary Planning document</li> <li>3) Improved safety for all road users</li> </ul>
<b>8. Key benefits</b>	<p>Public realm improvements will increase walkability and encourage shifts to more sustainable modes of transport</p> <p>Disabled users will have better access to the building from the public highway thus enhancing accessibility factors</p> <p>Improved lighting will make pedestrians feel safer on the streets and walkways surrounding the development</p>
<b>9. Project category</b>	4a. Fully reimbursable
<b>10. Project priority</b>	B. Advisable
<b>11. Notable exclusions</b>	<i>None</i>

### **Options Appraisal**

<b>12. Overview of options</b>	12.1 Complete project as per the outline design specification listed in the s106 agreement
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	12.2 Vary design specification following further consultation with stakeholders and agreement from the developer to enhance delivery of aims and objectives (subject to funds being available).
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### **Project Planning**

<b>13. Delivery period and key dates</b>	<p><b>Overall project:</b> (Lower estimate) Completion in November 2023 subject to developer programme</p> <p><b>Key dates:</b></p> <ul style="list-style-type: none"> <li>• October 2022 – designs for improvements to the surrounding highways finalised</li> <li>• March 2023 – Gateway 5 report to be finalised and submitted for delegated approval</li> <li>• August 2023 – public realm construction works to start on site</li> <li>• November 2023 – completion of public realm works</li> </ul> <p><b>Other works dates to coordinate:</b> TBC with highways/transport works programme</p>
<b>14. Risk implications</b>	<p><b>Overall project risk:</b> Low</p> <ul style="list-style-type: none"> <li>• Delays to the developer programme owing to changing market forces or engineering difficulties during construction</li> <li>• Rising cost of materials could mean that the project is descoped and will not deliver all aims and objectives. (For now the risk is mitigated by the new highways contract although, contract performance will be monitored over the next year to ascertain likelihood of rate variations.)</li> </ul>
<b>15. Stakeholders and consultees</b>	<ol style="list-style-type: none"> <li>1. Fleet Street BID</li> <li>2. Local Ward Members</li> <li>3. Owners/occupiers of adjacent buildings</li> </ol> <p>An equality impact assessment will be undertaken prior to Gateway 5. The results will be reported at the next Gateway.</p>

### **Resource Implications**

<b>16. Total estimated cost</b>	<p><b>Likely cost range (excluding risk):</b> £200,000</p> <p><b>Likely cost range (including risk):</b> £200,000</p>	
<b>17. Funding strategy</b>	<p>Choose 1:</p> <p>Choose an item.</p>	<p>Choose 1:</p> <p>Choose an item.</p>

	<b>Funds/Sources of Funding</b>	<b>Cost (£)</b>
	Section 106 (Section 278 Design & Evaluation fee)	£50k
	Section 278	£150k
	<b>Total</b>	<b>£200k</b>
<b>18. Investment appraisal</b>	Not applicable.	
<b>19. Procurement strategy/route to market</b>	<p>The design and construction drawings are to be undertaken by City of London officers</p> <p>The construction work is to be carried out by the City of London's Term Highways Contractor</p>	
<b>20. Legal implications</b>	<p>Where the City Corporation are satisfied it will be of benefit to the public, Section 278 of the Highways Act 1980 allows the City Corporation as highway authority to enter into an agreement with any person for the execution of works by the authority on terms that that person pays the whole or such part of the costs of the works as may be specified. The proposed works are considered to be of benefit to the public. The Section 106 agreement requires the developer to enter into a Section 278 agreement with the City no later than 12 months following the Implementation Date. The S.278 agreement will be finalised before the Gateway 5 report is submitted for approval.</p>	
<b>21. Corporate property implications</b>	<b>None</b>	
<b>22. Traffic implications</b>	Possible road closures and disruption to vehicle traffic during the construction phase. Pedestrian access on the public highway will be maintained at all times.	
<b>23. Sustainability and energy implications</b>	The materials and working practises will be as per the sustainability criterion of the City of London's Term Highways Contract	
<b>24. IS implications</b>	<i>None</i>	
<b>25. Equality Impact Assessment</b>	An equality impact assessment will be undertaken prior to Gateway 5	
<b>26. Data Protection Impact Assessment</b>	<i>The risk to personal data is less than high or non-applicable and a data protection impact assessment will not be undertaken</i>	

## **Appendices**

<b>Appendix 1</b>	Project Briefing
<b>Appendix 2</b>	Risk Register
<b>Appendix 3</b>	Site location plan

## **Contact**

<b>Report Author</b>	Nick Howdle-Smith
<b>Email Address</b>	<a href="mailto:nick.howdle-smith@cityoflondon.gov.uk">nick.howdle-smith@cityoflondon.gov.uk</a>
<b>Telephone Number</b>	07745 138 283

# Project Briefing

Project identifier			
<b>[1a] Unique Project Identifier</b>	12348	<b>[1b] Departmental Reference Number</b>	
<b>[2] Core Project Name</b>	100 Fetter Lane s278		
<b>[3] Programme Affiliation</b> (if applicable)			

Ownership	
<b>[4] Chief Officer has signed off on this document</b>	Yes
<b>[5] Senior Responsible Officer</b>	Tom Noble
<b>[6] Project Manager</b>	Nick Howdle-Smith

Description and purpose					
<b>[7] Project Description</b>					
<p>Deliver public realm enhancement to the area surrounding the new development at 100 Fetter Lane. The enhancements may include but are not limited to:-</p> <p>a) improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement,</p> <p>b) works to tie the new building line and new route into the public highway on Mac's Place,</p> <p>c) public highway lighting improvements,</p> <p>d) the provision of an on-street blue badge parking space within the vicinity of the Site,</p> <p>e) footway surrounding the site to be replaced with York stone, and</p> <p>f) any cycle improvements necessary to allow access to the cycle parking.</p>					
<b>[8] Definition of Need: What is the problem we are trying to solve or opportunity we are trying to realise (i.e. the reasons why we should make a change)?</b>					
<p>A planning permission to demolish and redevelop an office building and public house at 100/108 Fetter Lane (21/00454/FULMAJ) was granted on 29th September 2021. The new pedestrian activities attracted to the the development necessitates changes to the highways to improve the street environment ensuring enhanced safety and attractiveness for road users aswell as reparations to existing highway resulting from the construction works. The proposed site lies within the Fleet Street Business Improvement District.</p>					
<b>[9] What is the link to the City of London Corporate plan outcomes?</b>					
<p>[1] People are safe and feel safe.</p> <p>[2] People enjoy good health and wellbeing.</p> <p>[9] Our spaces are secure, resilient and well-maintained.</p> <p>[11] Our spaces are digitally and physically well-connected and responsive.</p> <p>[12] Our spaces inspire excellence, enterprise, creativity and collaboration.</p>					
<b>[10] What is the link to the departmental business plan objectives?</b>					
<p>[1] Advancing a flexible infrastructure that adapts to increasing capacity and changing demands. [5] Creating an accessible city which is stimulating, safe and easy to move around in [8] Improving quality of life for workers, residents and visitors</p>					
<b>[11] Note all which apply:</b>					
<b>Officer:</b> Project developed from Officer initiation	Y	<b>Member:</b> Project developed from Member initiation	N	<b>Corporate:</b> Project developed as a large scale Corporate initiative	N
<b>Mandatory:</b>	N	<b>Sustainability:</b>	N	<b>Improvement:</b>	Y

Compliance with legislation, policy and audit		Essential for business continuity		New opportunity/ idea that leads to improvement	
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<b>Project Benchmarking:</b>	
<b>[12] What are the top 3 measures of success which will indicate that the project has achieved its aims?</b> <These should be impacts of the activity to complete the aim/objective, rather than 'finishes on time and on budget'>>	
1) Improvements for walking and cycling in the proximity of the development	
2) Improvements to the attractiveness of the public realm in the proximity of the development in line with the CPR Supplementary Planning document	
3) Improved safety for all road users	
<b>[13] Will this project have any measurable legacy benefits/outcome that we will need to track after the end of the 'delivery' phase? If so, what are they and how will you track them? (E.g. cost savings, quality etc.)</b>	
Not applicable	
<b>[14] What is the expected delivery cost of this project (range values)[£]?</b>	
Lower Range estimate: £150,000 Upper Range estimate: £220,000	
<b>[15] Total anticipated on-going revenue commitment post-delivery (lifecycle costs)[£]:</b>	
The costs associated with highways maintenance will be confirmed at Gateway 5 when the detailed design is finalised. These costs will be met by the developer through the S278 agreement.	
<b>[16] What are the expected sources of funding for this project?</b>	
Project funded by a S278 agreement with the developer. Fees of £50,000 to progress the highway designs have been received from the developer.	
<b>[17] What is the expected delivery timeframe for this project (range values)? Are there any deadlines which must be met (e.g. statutory obligations)?</b>	
Lower Range estimate: May 2022 – April 2024 Upper Range estimate: May 2022 – November 2024 <Critical deadline(s):> TBC	

<b>Project Impact:</b>	
<b>[18] Will this project generate public or media impact and response which the City of London will need to manage? Will this be a high-profile activity with public and media momentum?</b>	
N/A	
<b>[19] Who has been actively consulted to develop this project to this stage?</b>	
Chamberlains: Finance	Officer Name: Darshika Patel
Chamberlains: Procurement	Officer Name: TBC
IT	Officer Name: N/A
HR	Officer Name: N/A
Communications	Officer Name: N/A
Corporate Property	Officer Name: N/A
External	
<b>[20] Is this project being delivered internally on behalf of another department? If not ignore this question. If so:</b>	

<b>Please note the Client supplier departments.          Who will be the Officer responsible for the designing of the project?          If the supplier department will take over the day-to-day responsibility for the project,          when will this occur in its design and delivery?</b>	
Client	Department:
Supplier	Department:
Supplier	Department:
Project Design Manager	Department:
Design/Delivery handover to Supplier	Gateway stage: <Before Project Proposal>, <Post Project Proposal>, <Post Options Appraisal>, <Post Detailed design>, <Post Authority to start work>

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**City of London: Projects Procedure Corporate Risks Register**Project name: 100 Fetter Lane s278Unique project identifier: PV12348Total est cost (exc risk) £200000

Corporate Risk Matrix score table

PM's overall risk rating	Low		Minor impact	Serious impact	Major impact	Extreme impact
Avg risk pre-mitigation	10.3	Likely	4	8	16	32
Avg risk post-mitigation	2.8	Possible	3	6	12	24
Red risks (open)	0	Unlikely	2	4	8	16
Amber risks (open)	6	Rare	1	2	4	8
Green risks (open)	0					

Costed risks identified (All)

£20,000.00	10%
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Costed risk as % of total estimated cost of project

Costed risk pre-mitigation (open)

£20,000.00	10%
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" "

Costed risk post-mitigation (open)

£0.00	0%
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" "

Costed Risk Provision requested

£0.00	0%
-------	----

CRP as % of total estimated cost of project

- (1) Compliance/Regulatory  
 (2) Financial  
 (3) Reputation  
 (4) Contractual/Partnership  
 (5) H&S/Wellbeing  
 (6) Safeguarding  
 (7) Innovation  
 (8) Technology  
 (9) Environmental  
 (10) Physical

Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
1	12.0	£0.00	0	1	0
3	10.7	£20,000.00	0	3	0
2	9.0	£0.00	0	2	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0

Issues (open)

0
---

Open Issues

Extreme	Major	Serious	Minor
---------	-------	---------	-------

0	0	0	0
---	---	---	---

All Issues

0
---

All Issues

0	0	0	0
---	---	---	---

Cost to resolve all issues  
(on completion)

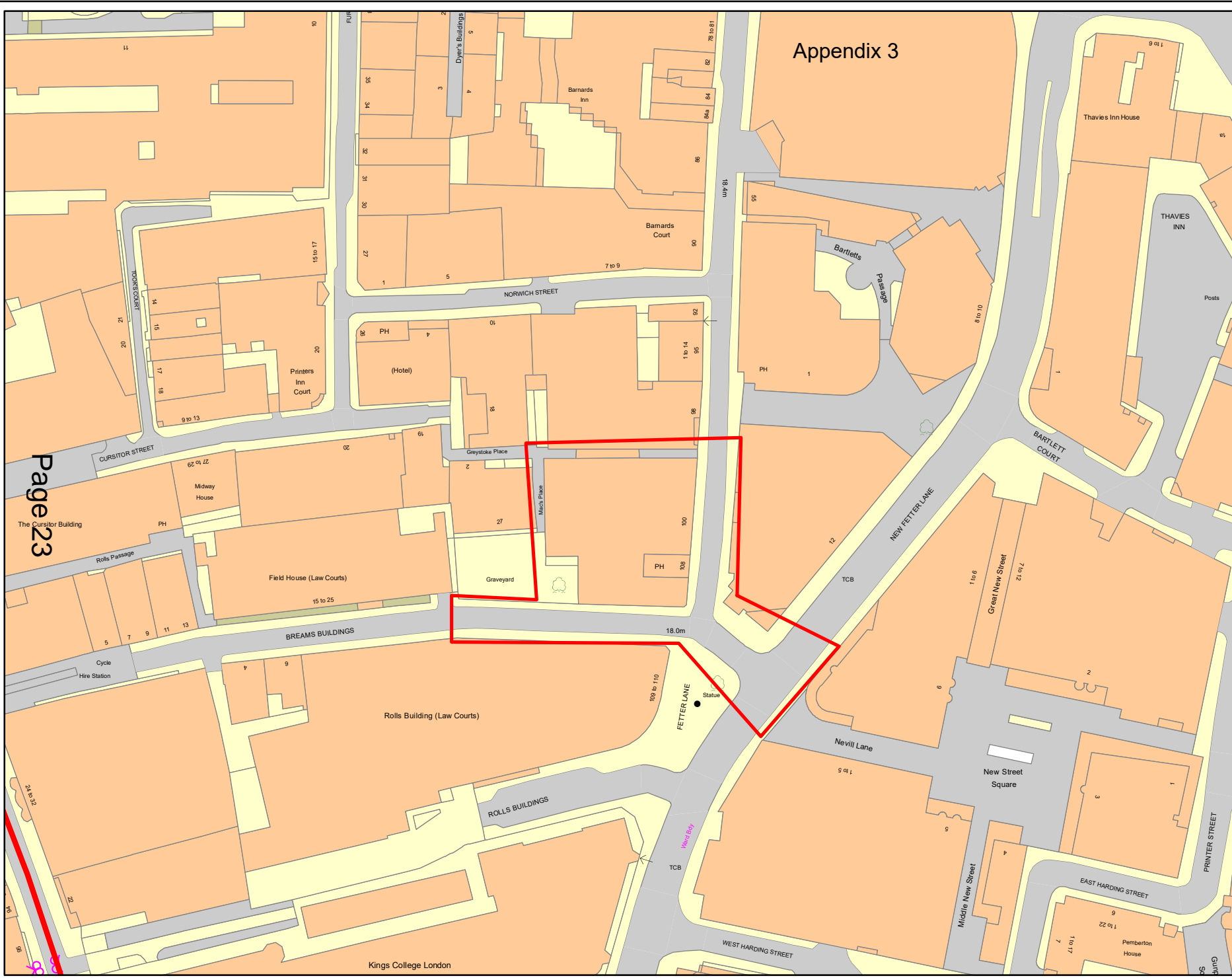
£0.00

Total CRP used to date

£0.00

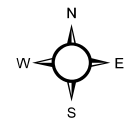
City of London: Projects Procedure Corporate Risks Register

Project Name:			100 Fetter Lane s278					PM's overall risk rating:			Low		CRP requested this gateway		£		-		Average unmitigated risk		10.3		Open Risks		6			
Unique project identifier:			PV12348					Total estimated cost (exc risk):			£		200,000		Total CRP used to date		£		-		Average mitigated risk score		2.8		Closed Risks		0	
General risk classification											Mitigation actions											Ownership & Action						
Risk ID	Gateway	Category	Description of the Risk	Risk Impact Description	Likelihood Classification pre-mitigation	Impact Classification pre-mitigation	Risk score	Costed Impact pre-mitigation (£)	Costed Risk Provision requested Y/N	Confidence in the estimation	Mitigating actions	Mitigation cost (£)	Likelihood Classification post-mitigation	Impact Classification post-mitigation	Costed Impact post-mitigation (£)	Post-Mitigation risk score	CRP used to date	Use of CRP	Date raised	Named Departmental Risk Manager/Coordinator	Risk owner (Named Officer or External Party)	Date Closed OR/Realised & moved to Issues	Comment(s)					
R1	5	(3) Reputation	Project is not delivered to agreed programme due to technical issues that arise either in design or construction phase	Underground services are discovered within excavation zone during construction phase adding time and cost to the project	Possible	Serious	6	£0.00	N		Technical issues to be identified by engineering team and developer communications and using surveys, engineering expertise to manage design issues	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith							
R2	5	(2) Financial	Developer does not agree to full costs of the scheme	this will either impact on the project programme as negotiations would take longer or the scope of works might have to be reduced to reduce the costs.	Possible	Major	12	£0.00	N		Regular communication with developer to manage expectations of deliverables and costs	£0.00	Possible	Minor	£0.00	3	£0.00				Nick Howdle-Smith							
R3	5	(3) Reputation	Stakeholders object to the scheme	Further redesign and consultation would be necessary	Possible	Major	12	£0.00	N		Good stakeholder engagement and communications	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith							
R4	5	(2) Financial	Cost of materials increasing over the course of project due to international supply chain issues / interest rate rises	Negatively affects construction costs	Possible	Major	12	£20,000.00	N		New highways contract to protect against fluctuating rates	£0.00	Possible	Serious	£0.00	6	£0.00				Nick Howdle-Smith		Highways team in present discussions with new contractor Conways					
R5	5	(2) Financial	The developer does not agree to commuted sums required for the s278 at project completion	The cost of maintaining the s278 area post completion may increase and need to be funded by the City	Likely	Serious	8	£0.00	N		Regular communication with developer to manage expectations of deliverables and costs	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith							
R6	3	(1) Compliance/Regulatory	Traffic orders are not applied for or incorrect traffic orders/procedures do not provide a regulatory backing for the legality of the scheme	Stakeholders are not consulted via the due process and exposes the scheme to legal challenge and subsequent program delay	Possible	Major	12	£0.00	N		Identify traffic order specialist via framework consultants prior to any engagement / consultation and form a program for integrating the legal processes	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith							



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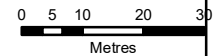
# Appendix 3



## Location Plan

Created by:  
Nick Howdle-Smith

Date Created:  
12 Apr 2022



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## Project Briefing

Project identifier			
<b>[1a] Unique Project Identifier</b>	12347	<b>[1b] Departmental Reference Number</b>	
<b>[2] Core Project Name</b>	Wood Street Police Station s278		
<b>[3] Programme Affiliation (if applicable)</b>			

Ownership	
<b>[4] Chief Officer has signed off on this document</b>	Yes
<b>[5] Senior Responsible Officer</b>	Tom Noble
<b>[6] Project Manager</b>	Nick Howdle-Smith

Description and purpose	
<b>[7] Project Description</b>	
<p>Deliver public realm enhancement to the area surrounding the new development at Wood Street Police Station. The enhancements may include but are not limited to:-</p> <ol style="list-style-type: none"> <li>1. Carriageway redesign including maintaining the existing cycle route on Wood Street;</li> <li>2. Consultation, removal and/or relocation of current kerbside activity including taxi rank and police bay (including the full length of Wood Street and Love Lane)</li> <li>3. Repaving the footway</li> <li>4. Crossover removal on Love Lane</li> <li>5. Landscaping works including trees and other greenery, seating, lighting and cycle parking</li> <li>6. Redesign of the priority junction between Love Lane and Wood Street</li> <li>7. Access ramp extension including stopping up; and</li> <li>8. Any other works required to tie into the existing street network.</li> </ol>	
<b>[8] Definition of Need: What is the problem we are trying to solve or opportunity we are trying to realise (i.e. the reasons why we should make a change)?</b>	
<p>A planning decision to refurbish the Wood Street Police Station building and change of use to 'hotel' (20/00773/FULL) was made on 30th September 2021. The new pedestrian and commercial activities attracted to the the development necessitates changes to the highways to improve the street environment ensuring enhanced safety and attractiveness for road users aswell as reparations to existing highway resulting from the construction works.</p>	
<b>[9] What is the link to the City of London Corporate plan outcomes?</b>	
<p>[1] People are safe and feel safe.          [2] People enjoy good health and wellbeing.          [9] Our spaces are secure, resilient and well-maintained.          [11] Our spaces are digitally and physically well-connected and responsive.          [12] Our spaces inspire excellence, enterprise, creativity and collaboration.</p>	
<b>[10] What is the link to the departmental business plan objectives?</b>	
<p>[1] Advancing a flexible infrastructure that adapts to increasing capacity and changing demands. [5] Creating an accessible city which is stimulating, safe and easy to move around in [8] Improving quality of life for workers, residents and visitors</p>	
<b>[11] Note all which apply:</b>	
<b>Officer:</b>	Y
<b>Member:</b>	N
<b>Corporate:</b>	N

Project developed from Officer initiation		Project developed from Member initiation		Project developed as a large scale Corporate initiative	
<b>Mandatory:</b> Compliance with legislation, policy and audit	N	<b>Sustainability:</b> Essential for business continuity	N	<b>Improvement:</b> New opportunity/ idea that leads to improvement	Y

<b>Project Benchmarking:</b>	
<b>[12] What are the top 3 measures of success which will indicate that the project has achieved its aims?</b> <These should be impacts of the activity to complete the aim/objective, rather than 'finishes on time and on budget'>>	
1) Improvements for walking and cycling in the proximity of the development	
2) Improvements to the attractiveness of the public realm in the proximity of the development in line with the CPR Supplementary Planning document	
3) Improved safety for all road users	
<b>[13] Will this project have any measurable legacy benefits/outcome that we will need to track after the end of the 'delivery' phase? If so, what are they and how will you track them? (E.g. cost savings, quality etc.)</b>	
Not applicable	
<b>[14] What is the expected delivery cost of this project (range values)[£]?</b>	
Lower Range estimate: £850,000 Upper Range estimate: £1,200,000	
<b>[15] Total anticipated on-going revenue commitment post-delivery (lifecycle costs)[£]:</b>	
The costs associated with highways maintenance will be confirmed at Gateway 5 when the detailed design is finalised. These costs will be met by the developer through the S278 agreement.	
<b>[16] What are the expected sources of funding for this project?</b>	
Project funded by a S278 agreement with the developer. Fees of £100,000 to progress the highway designs have been received from the developer.	
<b>[17] What is the expected delivery timeframe for this project (range values)? Are there any deadlines which must be met (e.g. statutory obligations)?</b>	
Lower Range estimate: May 2022 – March 2024 Upper Range estimate: May 2022 – October 2024 <Critical deadline(s):> TBC	

<b>Project Impact:</b>	
<b>[18] Will this project generate public or media impact and response which the City of London will need to manage? Will this be a high-profile activity with public and media momentum?</b>	
Possible media interest from conversion of Wood Street Police Station	
<b>[19] Who has been actively consulted to develop this project to this stage?</b>	
Chamberlains: Finance	Officer Name: Darshika Patel
Chamberlains: Procurement	Officer Name: TBC
IT	Officer Name: N/A
HR	Officer Name: N/A
Communications	Officer Name: N/A

Corporate Property	Officer Name: N/A
External	
<b>[20] Is this project being delivered internally on behalf of another department? If not ignore this question. If so:</b> <b>Please note the Client supplier departments.</b> <b>Who will be the Officer responsible for the designing of the project?</b> <b>If the supplier department will take over the day-to-day responsibility for the project, when will this occur in its design and delivery?</b>	
Client	Department:
Supplier	Department:
Supplier	Department:
Project Design Manager	Department:
Design/Delivery handover to Supplier	Gateway stage: <Before Project Proposal>, <Post Project Proposal>, <Post Options Appraisal>, <Post Detailed design>, <Post Authority to start work>

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**City of London: Projects Procedure Corporate Risks Register**Project name: Wood Street Police Station s278Unique project identifier: PV12345Total est cost (exc risk) £1200000

Corporate Risk Matrix score table

PM's overall risk rating	Low		Minor impact	Serious impact	Major impact	Extreme impact
Avg risk pre-mitigation	9.0	Likely	4	8	16	32
Avg risk post-mitigation	2.6	Possible	3	6	12	24
Red risks (open)	0	Unlikely	2	4	8	16
Amber risks (open)	7	Rare	1	2	4	8
Green risks (open)	1					

Costed risks identified (All)

£85,000.00 7%

Costed risk as % of total estimated cost of project

Costed risk pre-mitigation (open)

£85,000.00 7%

" "

Costed risk post-mitigation (open)

£0.00 0%

" "

Costed Risk Provision requested

£0.00 0%

CRP as % of total estimated cost of project

- (1) Compliance/Regulatory  
 (2) Financial  
 (3) Reputation  
 (4) Contractual/Partnership  
 (5) H&S/Wellbeing  
 (6) Safeguarding  
 (7) Innovation  
 (8) Technology  
 (9) Environmental  
 (10) Physical

Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
2	9.0	£0.00	0	2	0
3	10.7	£85,000.00	0	3	0
2	9.0	£0.00	0	2	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
1	4.0	£0.00	0	0	1

Issues (open)

0

Open Issues

Extreme	Major	Serious	Minor
0	0	0	0
0	0	0	0

All Issues

0

All Issues

Cost to resolve all issues  
(on completion)

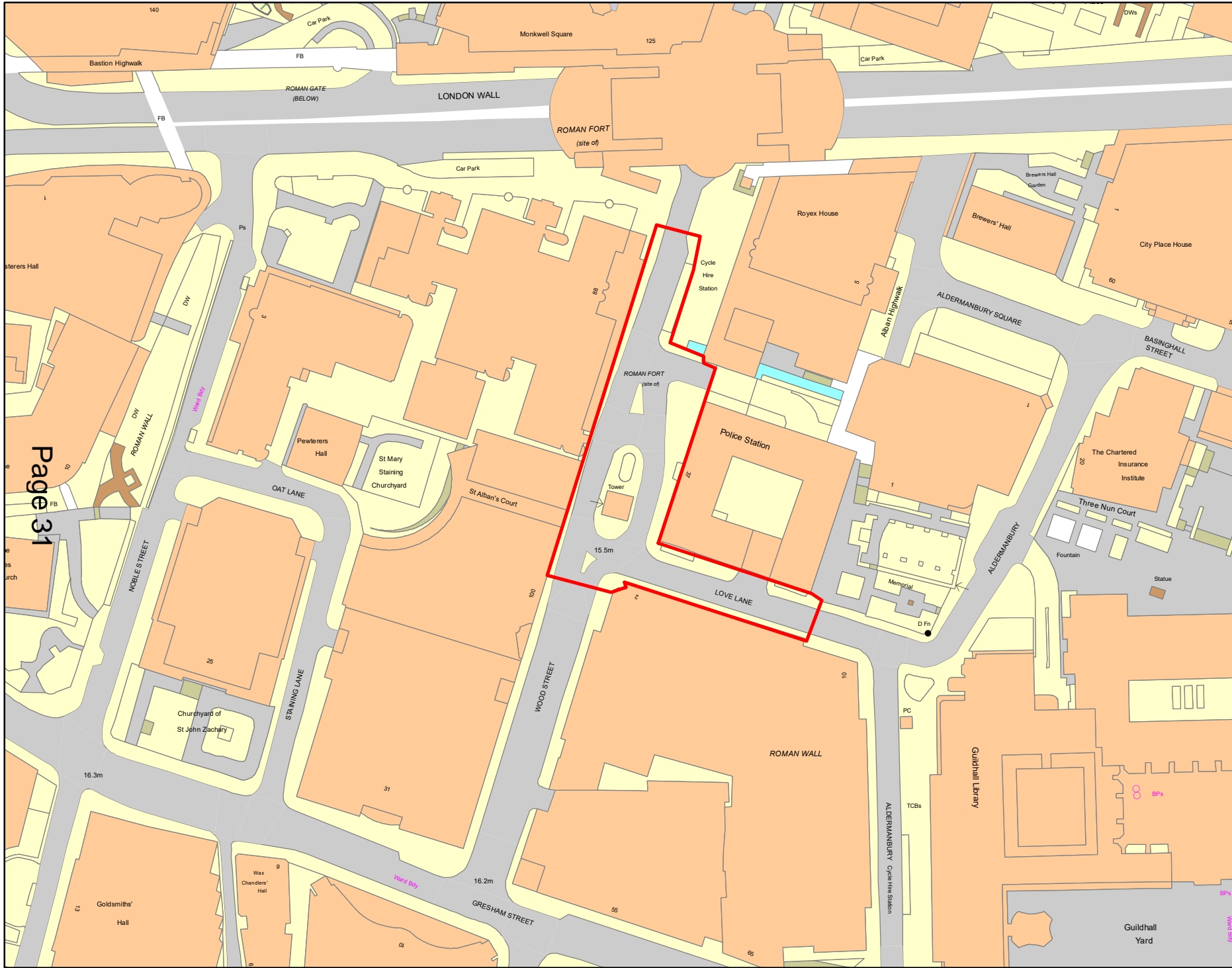
£0.00

Total CRP used to date

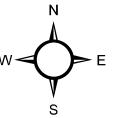
£0.00

City of London: Projects Procedure Corporate Risks Register

Project Name:			Wood Street Police Station s278				PM's overall risk rating:		Low		CRP requested this gateway				Average unmitigated risk		9.0		Open Risks		8		
Unique project identifier:			PV12345				Total estimated cost (exc risk):		£ 1,200,000		Total CRP used to date		£ -		Average mitigated risk score		2.6		Closed Risks		0		
General risk classification											Mitigation actions								Ownership & Action				
Risk ID	Gateway	Category	Description of the Risk	Risk Impact Description	Likelihood Classification pre-mitigation	Impact Classification pre-mitigation	Risk score	Costed Impact pre-mitigation (£)	Costed Risk Provision requested Y/N	Confidence in the estimation	Mitigating actions	Mitigation cost (£)	Likelihood Classification post-mitigation	Impact Classification post-mitigation	Costed Impact post-mitigation (£)	Post-Mitigation risk score	CRP used to date	Use of CRP	Date raised	Named Departmental Risk Manager/Coordinator	Risk owner (Named Officer or External Party)	Date Closed OR/Realised & moved to issues	Comment(s)
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R2	5	(2) Financial	Developer does not agree to full costs of the scheme	This will either impact on the project programme as negotiations would take longer or the scope of works might have to be reduced to reduce the costs.	Possible	Major	12	£0.00	N	B – Fairly Confident	Regular communication with developer to manage expectations of deliverables and costs	£0.00	Possible	Minor	£0.00	3	£0.00				Nick Howdle-Smith		
R3	5	(3) Reputation	Stakeholders object to the scheme	Further redesign and consultation would be necessary	Possible	Major	12	£0.00	N	B – Fairly Confident	Good stakeholder engagement and communications	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith		
R4	5	(2) Financial	Cost of materials increasing over the course of project due to international supply chain issues / interest rate rises	Negatively affects construction costs at GWS	Possible	Major	12	£85,000.00	N	B – Fairly Confident	New highways contract to protect against fluctuating rates	£0.00	Possible	Serious	£0.00	6	£0.00				Nick Howdle-Smith		Highways team in present discussions with new contractor Conways
R5	5	(2) Financial	The developer does not agree to commuted sums required for the s278 at project completion	The cost of maintaining the s278 area post completion may increase and need to be funded by the City	Likely	Serious	8	£0.00	N	A – Very Confident	Regular communication with developer to manage expectations of deliverables and costs	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith		
R6	4	(1) Compliance/Regulatory	Objections received to proposed highway alterations	Delays to the project owing to objections to the various highway changes	Possible	Serious	6	£0.00	N	B – Fairly Confident	Early engagement with affected stakeholders on the proposed changes	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith		
R7	4	(10) Physical	Design conflicts with other developments in the area	Objections to the design received owing to impact on other nearby developments	Unlikely	Serious	4	£0.00	N	A – Very Confident	Early engagement with affected stakeholders on the proposed changes	£0.00	Rare	Serious	£0.00	2	£0.00				Nick Howdle-Smith		
R8	3	(1) Compliance/Regulatory	Traffic orders are not applied for or incorrect traffic orders/procedures do not provide a regulatory backing for the legality of the scheme	Stakeholders are not consulted via the durs process and exposes the scheme to legal challenge and subsequent program delay	Possible	Major	12	£0.00	N	A – Very Confident	Identify traffic order specialist via framework consultants prior to any engagement / consultation and form a program for integrating the legal processes	£0.00	Unlikely	Minor	£0.00	2	£0.00				Nick Howdle-Smith		



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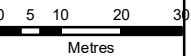


## Location Plan

### Appendix 3

Created by:  
Nick Howdle-Smith

Date Created:  
14 Apr 2022



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<b>Committee(s):</b> Streets and Walkways Sub Committee [for decision]	<b>Dated:</b> 31/05/2022
<b>Subject:</b> All Change at Bank: traffic and timings review plan	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 9, 11, 12
<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>	<b>Y</b>
<b>Report of:</b> Executive Director Environment	<b>For Decision</b>
<b>Report author:</b> Gillian Howard, Environment	

## Summary

A motion was approved at the Court of Common Council in April 2022 which included the following requirement in relation to Bank junction:

*“That the Planning & Transportation Committee be requested immediately to begin a review of the nature and timing of current motor traffic timing restrictions at Bank Junction, to include all options. This review will include full engagement with Transport for London and other relevant stakeholders, data collection, analysis and traffic modelling. The Planning & Transportation Committee should then present its recommendation to this Honourable Court as soon as practicable.”*

The methodology for the review, including assumptions and associated risks, is provided in Appendix 1. Members are asked to approve in principle this approach, acknowledging that it might have to vary depending upon the results of the work, engagement, and agreements with Transport for London on the technical specification of the traffic model (which has yet to take place). The outlined programme is indicative and may have to change.

Members are also asked to note that where a report is proposed to be submitted for committee consideration during the development of the review, it has been assumed that this remains with Streets and Walkways Sub Committee and/or Planning and Transportation. If this is not the case, and more committees wish to receive the reports, this may have implications on the indicative programme in the appendix.

## Recommendation(s)

Members are asked to:

1. Agree, in principle, the methodology set out in Appendix 1 for undertaking the traffic and timing mix review as part of the All Change at Bank project.
2. Note the associated risks with the proposed plan (outlined in paragraphs 19-24).

## **Main Report**

### **Background**

1. Following the motion agreed at the Court of Common Council in April 2022, this report seeks Members agreement of the approach detailed in Appendix 1.
2. The document in Appendix 1 sets out the objective of the review, the assumptions, how the review will be undertaken and the options that are under consideration along with an indicative programme and key risks.
3. There is a second report on this agenda for this meeting which if approved is the final decision required before the substantial transformation of the All Change at Bank project can commence construction. The Gateway 5 report was approved in December 2021 subject to the outcome of the statutory traffic order consultation. It was noted in the September and December 2021 reports that the review of traffic mix and timings would be undertaken, and a time frame of within 12 months of completion of the construction of the project was referenced.
4. If the traffic order report is approved, this will set a new physical layout for the junction. It will reduce the number of arms available for motor vehicles, simplify the layout of the junction, improving its safety and provide significantly more space for people walking in the area. It will also allow for new spaces for people to be able to stop and rest providing opportunities for tree planting and greener spaces supporting the Climate Action Strategy.
5. The approved design for the All Change at Bank does not prevent changes to the traffic mix and timing of restrictions on the remaining open arms.

### **Current Position**

6. If the principle of the scope and methodology outlined in Appendix 1 are agreed, then work on the review will commence and a full cost estimate to complete the review will be established.
7. The review is likely to be more complex to undertake from a technical perspective than originally envisaged at the Gateway 5 report in December 2021 when we were anticipating undertaking the review in the latter part of 2023 into 2024.
8. The complexity is in part due to the risk of the timing of the main data collection exercise during the experimental phases of the Bishopsgate and London Bridge schemes. With no firm decision on whether these schemes may be changed or removed this is likely to lead to more sensitivity tests being undertaken in the traffic modelling as a preferred option is established.
9. Also, stakeholder engagement is likely to be more complex given that the main benefits of the approved All Change at Bank design will not have been experienced by anyone when public consultation is likely to need to take place. This has the potential to affect people's views as they may not have a full

understanding of the way the streets will operate once the construction work has concluded.

10. It is proposed that an external consultant is appointed to develop the methodology for engagement and consultation and to undertake the consultation and analysis work.
11. Once work packages are developed and quotes received, we will be able to assess whether the funding estimated within the budget at Gateway 5 is going to be sufficient and, if required, submit an Issues report setting out the options for balancing the funding within the project budget.

## **Options**

12. At this stage, a way forward is presented in Appendix 1. Members are asked to consider the Appendix and confirm whether
  - a) That the key assumptions are acceptable
  - b) The outlined scope of work meets Members expectations for this review,
  - c) The proposed way forward to minimise the number of traffic modelling runs at the feasibility stage is acceptable.
    - i) i.e. that we concentrate on assessing the option to have Cornhill, Poultry and Lombard/King William Street 'open' to another mix of traffic in both directions in the first instance.
    - ii) If that is not feasible, to then start working through the appropriate movement options of either reducing the number of arms 'open' or banning movements to facilitate another vehicle type during the restricted hours.
  - d) That if the above is agreed, to note the risk associated with this approach.

## **Proposals**

13. To agree or amend the proposal in Appendix 1 of how to undertake the traffic mix and timing review.

## **Key Data**

14. N/A at this stage

## **Corporate & Strategic Implications**

Strategic implications

15. The review will take into account the Corporate Plan, Transport Strategy, Climate Action Strategy and any other relevant Corporate strategies and plans.

Financial implications

16. At this stage there are no financial implications – but there is a risk that the review will be more expensive than first envisaged. If the proposed way forward is agreed a costing exercise will be undertaken and if required, an Issues report submitted to explain how to balance the funding within the project budget.

Resource implications

17. There will be external commissions to be managed by a project manager within the project team.

#### Legal implications

18. Any proposal that comes out of the review will need to demonstrate how it complies with 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 of amenities of any locality.

(bb) national air quality strategy.

(c) public service vehicles.

(d) any other relevant matters.

#### Risk implications

19. Members should note the risk of undertaking the review whilst the experimental schemes by Transport for London on Bishopsgate and London Bridge, and the City's experimental schemes, are still in their monitoring phases. Undertaking the traffic counts to update the traffic model with these in place creates a risk of abortive work should it be later decided that these experimental schemes are not progressed into permanent schemes or change significantly from their current arrangements; particularly the Bishopsgate/London Bridge schemes.
20. The traffic modelling results will outline likely journey time impacts but rely on reasonable representative flow of traffic at each junction within the model. If those traffic flows on corridors change substantially during the process of us assessing the options for changing the traffic mix, then the impacts and/or benefits regarding journey times will not be representative.
21. This may impact our ability to be able to get a subsequent Traffic Management Approval (TMAN) for changing the traffic mix and or timing of the restrictions. It is possible that to progress a change of traffic mix and or timing that we could be asked to restart the traffic modelling process again if this were to happen.
22. With that risk in mind, the proposal in Appendix 1 assumes that Bishopsgate and London Bridge and the City's experimental schemes remain long term. This is what the traffic model once updated with new traffic flows will best represent.
23. In addition, there is a risk that at the stage of submission for the required Traffic Management approvals from TfL that they could refuse to approve the submission. Cornhill and Poultry are part of the Strategic Road Network as defined in the Traffic Management act 2004. This means that TfL are more than a consultee on these streets and able to veto proposals.
24. Early engagement should minimise this risk but there is a risk that a change in the traffic mix or timings of the restrictions at Bank may impact on their existing



experimental schemes, which may be made permanent, which could influence discussions.

#### Equalities implications

25. As the review progresses, equalities analysis and appropriate stakeholder engagement with impacted protected characteristics will be undertaken. These will be presented at the appropriate stages when Members are asked to take decisions.

#### Climate implications

26. No direct implications from undertaking the review. Any proposal for implementation will consider the implications of the Climate Action Strategy

#### Security implications

27. No direct implication from undertaking the review. If required consideration to security and safety will be included when assessing the proposals.

### Conclusion

28. Officers have been asked to bring forward the traffic mix and timing review of the restrictions at Bank junction to start immediately. The plan in Appendix 1 sets out in more detail how it is proposed to do this. It also sets out the assumptions that will be made and the risks associated with the approach outlined.
29. Members are asked to agree or amend the proposal in Appendix 1.

### Appendices

- Appendix 1 – Draft plan for restrictions review.

### Background Papers

Gateway 5: Authority to start work (December 2021)

<https://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=122207>

**Gillian Howard**

Environment

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## **Bank Junction Improvements Project: All Change at Bank**

Traffic mix and timing review plan.

May 2022

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## Introduction

1. Following the decision of the Court of Common Council on 22 April 2022 to approve the Motion:

*“That the Planning & Transportation Committee be requested immediately to begin a review of the nature and timing of current motor traffic timing restrictions at Bank Junction, to include all options. This review will include full engagement with Transport for London and other relevant stakeholders, data collection, analysis and traffic modelling. The Planning & Transportation Committee should then present its recommendation to this Honourable Court as soon as practicable.”*

2. This document sets out the scope of this review namely:

- how that review is intended to be undertaken
- the options to be investigated
- the process and indicative programme
- the associated risks

## **Objective of the review**

3. Work to improve the area around Bank Junction in the heart of the City has been ongoing for many years. It is a constrained site and has a history of serious and fatal collisions, leading to the Bank on Safety intervention in May 2017 when the junction was restricted to buses and cycles only, Monday to Friday 7am to 7pm.
4. Work to deliver wider improvements to the junction is progressing with the aim of delivering the four project objectives of the All Change at Bank project - further improving safety, pedestrian comfort, air quality and the sense of place.
5. This work has culminated in a proposal, which has Gateway 5 approval, to restrict part of Threadneedle Street and Queen Victoria Street on the approach to the junction to people cycling and walking only, and modify the operation of Princes Street to have a section of a single carriageway, two- way working, where it joins the junction (See Appendix A)
6. Subject to the outcome of the statutory traffic order process this work is programmed to start later in 2022.
7. The primary objective of the review is to assess whether for the arms of Poultry, Cornhill, and Lombard/King William Street there is:
  - a better balance of traffic mix than currently permitted in the current Monday to Friday 7am to 7pm restriction; and
  - whether those restriction times are the optimum operational hours
8. The review will be based on a mix of traffic modelling and other data collection to present to all Members to fully understand the benefits and disbenefits of any potential changes to allow additional traffic modes to use the junction during restricted hours and/or extensions to the timings of restrictions.
9. The review will consider how changes might contribute to better achieving the All Change at Bank project objectives and the balance of local access requirements.
10. Options could then proceed to public consultation subject to member approval.

## **What has previously been agreed**

11. The broad objectives of the All Change at Bank Project are to:
  - Continue to reduce casualties
  - Reduce pedestrian crowding levels
  - Improve air quality
  - Improve the perception of place as a place to spend time in.

12. There has been an ongoing requirement to undertake the traffic and timing mix review as part of the All Change at Bank project. It was originally intended that this would be done at the same time as the development of the physical design changes which have now been approved at Gateway 5; However, due to the pandemic there was uncertainty of
- traffic flows and composition,
  - long term changes to travel and work patterns
  - temporary traffic orders as part of the emergency response to COVID-19. Some have subsequently rolled into experimental orders, including the restrictions on Bishopsgate, Gracechurch Street and London Bridge, implemented by TfL.
13. These factors have a significant impact on the outcomes of the review, and officers therefore had recommended that this work was delayed until we had more certainty over these elements to avoid abortive work.
14. In February 2021, prior to public consultation on the proposed design, the work that had been completed to date on the traffic and timing mix review was included in a report to the Streets and Walkways Sub Committee. In terms of the scope of the review it was agreed:
- that reducing the hours of operation was not recommended.
  - That reintroducing all traffic modes was not recommended.
  - To seek people's views in the public consultation on allowing additional traffic during restricted hours and extending the hours of operation.
15. The findings of the consultation including the questions around mix and timings are detailed in the issues report presented to the Streets and Walkways Sub Committee in September 2021. This report also approved the progress of the All Change at Bank project to Gateway 5, subject to the outcome of the statutory traffic order process. A timeframe for full review was debated and members agreed that the review would take place within 12 months of completion of the construction of the All Change at Bank project.
16. The subsequent motion at Court of Common Council in May 2022 requires this review to commence immediately.
17. The Bishopsgate Experimental Traffic Order (ETO) went live in mid- January 2022 and the London Bridge ETO in February 2022. These ETOs are in effect a continuation of the restrictions to vehicle movement along Bishopsgate/Gracechurch Street corridor which had originally been implemented as temporary traffic orders. On Bishopsgate this restricts traffic to buses and cycles only, other than for short sections of access Monday to Friday 7am to 7pm. The London Bridge ETO restricts movement to buses, taxis and cycles only. Officers will bring a draft response to the statutory consultation on the

Bishopsgate ETO to the July meeting of the Streets and Walkways Sub Committee.

## **Assumptions**

18. The key assumptions for the review are:

1. The base restriction for alternatives to be compared against is buses and cycles only Monday to Friday 7am to 7pm, i.e., the current approved scheme with TfL and at Gateway 5.
2. The restrictions being reviewed would apply to Cornhill, Lombard/King William Street and Poultry which are currently proposed to remain buses and cycles only Monday to Friday 7am to 7pm. (See second plan of Appendix A (Dark Blue area))
3. Sensitivity testing on whether it would be possible to allow more than buses and cycles northbound on Princes Street at any time will be undertaken. If possible (from a traffic signal timing perspective and journey time implication) this route could also be considered in terms of a change in traffic mix, but not timing and the agreed changes mean it would need to remain an 'at any time' restriction.
4. We will revisit the potential to allow all traffic that was previously excluded to ensure that decision remains valid based on more recent data.
5. That the decision taken in February 2021 to not investigate reducing the hours of operation of the restrictions remains valid.
6. That the current experimental schemes on Bishopsgate and London Bridge remain in situ in the future.
7. That the City's experimental schemes as part of the pedestrian priority programme remain in situ in the future. This includes Old Broad St (one way) Threadneedle Street, King Street, King William Street and Cheapside (point closure)
8. That the approved scheme design will be delivered, and that only very minor modifications can be made if required.
9. That TfL have the resource at the appropriate times to undertake the traffic modelling audits and to write the scheme impact assessment at the required time outlined in the programme. TfL are currently suffering from a lack of resources so this is one of the biggest risks to indicative programme.

## **How will the review be undertaken?**

19. The review will be undertaken in three stages:

Stage 1



20. Identify options for timing and traffic mix to be taken through to further detailed work. The outcome of this stage will be reported to Members for approval and is effectively a Gateway 3 report. It is expected that no more than three options for traffic mix will be taken forward for more detailed review.

#### Stage 2

21. The options will then be assessed in more detail. The outcome of this work will aim to recommend an option(s) for Members to agree that could proceed to public consultation. Effectively a Gateway 4 report. Following approval of this report public consultation would be undertaken.
22. The public consultation responses will then be reported, alongside more detailed traffic modelling outputs and more details of the impacts of the proposals on the All Change at Bank project objectives and the aspirations of the Transport Strategy and Climate Action Strategy. Members of the Court can then decide whether to proceed with the formal application for Traffic Management Approval with TfL and the advertising the associated Statutory Traffic Orders. Effectively a Gateway 5 report

#### Stage 3

23. Subject to the outcome of those statutory procedures, it would then be possible to make the changes to the traffic mix/and or timings at the appropriate time. As reported previously there are likely to only be limited physical works required to implement any changes to traffic mix and timings. However, implementation dates would need to coincide with or follow on from the end of the All change at Bank construction period.

#### **Traffic mix options to be considered**

24. There are essentially four classes of vehicle that can easily be distinguished within approved DfT signage when showing a blue roundel (permitted route) or a red roundel (restricted route). These four classes are buses, cycles, taxis and powered two wheelers (motorcycles and mopeds). These are also easily distinguishable within the traffic composition surveys which support the traffic modelling work. The outputs of the traffic modelling work will support this review and any subsequent recommendation.
25. The baseline that these options will be tested against will be the current restrictions of buses and cycles only on the approved revised layout. This is because Bank Junction is a key route for buses and the most recent approvals have been obtained on the basis that buses should remain on Poultry, Cornhill, Princes Street and King William/Lombard Street. It is unlikely that we would receive any support to amend or remove buses from Transport for London, and this would go against the outcomes of our Transport Strategy.
26. It is therefore suggested that we start by considering the following scenarios:
1. Buses and cycles +taxis

2. Buses and cycles + powered two wheelers
  3. Buses and cycles + taxis + powered two wheelers
  4. Buses and cycles + all traffic
27. These are the four modal scenarios that we are confident can be legally signed and enforced within existing DfT regulations.
28. The traffic modelling outputs for these scenarios will provide comparable journey time impacts/benefits for comparison against each other and compared to the base assumption (buses and cycle only).

### **Timing options to be investigated**

29. As agreed, the timings of the restrictions will also be reviewed. The original Monday to Friday 7am to 7pm timings were installed because that was the time that 75% of the collisions at the junction were occurring. The restrictions to date have been successful in reducing the number of collisions and of people killed or injured. With the addition of significant physical change at the junction, this opens an opportunity to review whether the timings could be modified to help maximise the outcomes for the project. Previous work identified that there were some concerns in the casualty data regarding evening and weekend casualty trends. It was agreed at the February 2021 Streets and Walkways to continue to consider extending the hours of operation. Reducing the hours was discounted based on the increased risk to safety. It is assumed that this decision remains the starting point in this review.
30. For all scenarios except allowing all traffic there will still be a need for some form of timed restriction on the three streets being reviewed (Cornhill, Lombard Street and Poultry).
31. The recommendation on which (if any) extension in time could be considered will be based on a review of traffic volumes, pedestrian data and collision analysis. The previous work on timing options published in February 2021 is provided in Appendix D for information.

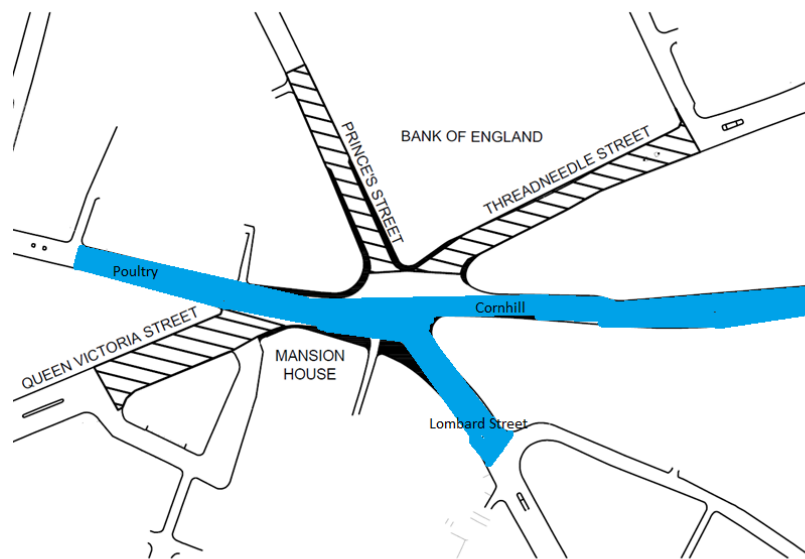
### **Workstreams:**

#### **Traffic modelling work – Journey time impacts**

32. Traffic modelling testing will help to prioritise the alternative options for viability and potential impacts and benefits. However, the traffic modelling work is only available for the weekday peak am and pm hours. It will therefore not help to determine different timings of the restrictions
33. It is proposed to take the approved All Change at Bank traffic model, update traffic data with new classified traffic counts at the required junctions (circa 25 junctions) and add in the restrictions on the TfL network for Bishopsgate, Gracechurch Street and London Bridge into the model. In addition, to add the City's Pedestrian Priority Streets experimental schemes on Cheapside, Threadneedle Street, Old Broad Street, King William Street, and King Street.

This is because these will be in place when we undertake the traffic surveys. This is not prejudging the outcome of the experiments – but representing the traffic flow situation as it is now.

34. As set out in the assumptions above we will assume that these schemes will remain in place for purposes of feasibility testing.
35. Once the traffic model has been updated, we will be able to test the four traffic mix scenarios. It is proposed to just do this on the assumption that the most attractive option for route choice is to be able to travel on all of Cornhill, Poultry and King William Street (indicated in blue in Figure 1) in both directions. It is proposed that this is the starting point and other options investigated if required.



*Figure 1 -blue solid colour indicating which arms are being reviewed for the traffic mix and timing review.*

36. This information will give an indication of journey time impacts at Bank Junction to compare to the approved All change at Bank scheme. This will include the impact/benefit on average wait and crossing times for people crossing at traffic signals, as well as journey times for people cycling or travelling by bus.
37. This will form part of the first evidence review to exclude options that are considered not to have merit in being progressed to further evaluation. (Stage 1)
38. The second set of traffic modelling (Stage 2) will then focus on those scenarios that do have merit for further investigations. This work will look at the impact on the wider network and how this might be balanced through mitigation measures, such as signal time changes, possibly other banned turns etc. to make the schemes as 'efficient' as possible from a predominantly traffic journey time perspective. This will, include the key corridors of Bishopsgate, Cannon Street, St Martin Le Grand and London Wall.
39. It is at this stage that we might need to look at other alternative movements on the arms of Poultry, Cornhill and Lombard Street if the model outputs suggest that unrestricted access in both direction for the specific mix of traffic is unlikely to

be feasible in terms of journey time implications. There are 31 different combinations of movements along the main three arms that could be considered. These are outlined in Appendix C. However, to look at all these would be expensive and may provide little differentiation between some combination of movements.

40. If the routing of all three arms open in both directions does not appear to be viable for allowing a change in traffic mix, then we can assess the information and look to remove an arm, or a turning movement. For example, it could be that the demand for London Bridge generates a large queue at the approach to Monument junction. To relieve that impact, we could try banning the right turn from Poultry into King William Street to reduce the demand and see if that would work better in the traffic model. Alternatively, we could look at just the east/west route as an option and remove the King William Street link entirely. Which options to investigate will be informed by the traffic model outputs and the update and review of the other work streams.
41. This information will feed into the second evidence review taking into account the impacts on the rest of the project objectives (effectively a Gateway 4 report). It is anticipated that at this point Members would be asked to approve a recommendation for an option(s) to be consulted on as part of the public consultation exercise.
42. In parallel to the traffic scenario testing above, there would also be a technical process with TfL to audit the base and future base traffic models, ready for any final assessment of the impacts of a preferred scheme. This will provide us with a level of assurance that for whichever option is taken forward to public consultation TfL are comfortable that the technical work around the model is acceptable and the generated journey time impacts are within a reasonable tolerance.
43. If, following public consultation, member approval is granted to proceed with a preferred option (effectively Gateway 5), the final audits will be undertaken, and TfL will produce a scheme impact assessment report. This will respond to any proposed change to the traffic mix or timings of the junction which will be used as part of the internal TfL approval process for the schemes Traffic Management Approval (TMAN).
44. It should be noted that Cornhill and Poultry form part of the Strategic Road Network (SRN), created in 2004 as part of the Traffic Management Act. TfL have two main roles in this approval process – firstly in terms of auditing and approving the traffic models and outputs. They also need to approve any changes that impact the SRN routes through the TMAN process. For schemes proposing a change they undertake a Scheme Impact Assessment which determines the impact of the proposals across the range of transport modes. Depending on the scale of these impacts, the decision on whether to grant TMAN approval or not may be taken by the Road Space Performance Group.
45. A map of the streets that form the SRN can be found in Appendix B

46. It should be noted that without knowing the outcome of the first phase of traffic modelling and how many traffic mix options there might be going through to the second phase of traffic modelling, it is difficult at this stage to forecast the number of traffic model 'runs' that will be required. There will also be sensitivity tests that need to be undertaken to try and ensure any proposals taken forward for consultation or delivery are robust and withstand reasonable traffic flow changes in the future. The more 'runs' required the more expensive the cost of the traffic modelling and the longer the process is likely to take.

### **Sensitivity testing.**

47. In addition, whilst not currently able to sign for Private hire vehicles (PHV) to be permitted it is suggested that a sensitivity test proportioning the composition of PHV is also undertaken should the position on signage change in the near future and the equalities analysis is indicating that this would be beneficial. This would be undertaken if there is a preferred option that includes Taxis.

48. Other sensitivity tests regarding the traffic modelling may also need to be undertaken to reassure that making any proposed change at Bank is likely to continue to work with other schemes that are in the pipeline to deliver the Transport and Climate Action Strategies.

### **Collision analysis**

(Work to be undertaken externally)

49. A collisions analysis for the area will be updated to include the latest figures (including the latest provisional figures which have not yet been audit/validated as this process usually takes 18 months). This will look at the causation factors, vehicles involved and severity of injury. This will help to assess the risk and benefit implications of making any changes to the vehicle mix or the timings of the restrictions.

50. 'U turning' vehicles have been specifically raised by some Members as a concern of the current restrictions. This will be investigated as part of this work as to whether this is a perceived safety issue or has resulted in an increase in this type of collision.

51. The detail of this is largely going to contribute to the stage 2 assessment.

### **Air quality**

52. We have an ongoing monitoring of NO<sub>2</sub> since 2016 and are able to track the global change of NO<sub>2</sub> at Bank and in the surrounding area. However, the diffusion tube method does not give granularity to assess the impact of individual changes or help to distinguish the impact on an hour-by-hour basis.

53. It is not proposed to undertake air quality modelling to support this review. However, working with the air quality team and/or consultants, an interpretation of the likely impacts and/or benefits of the options will be looked at and presented in the review for consideration

54. The detail of this is largely going to contribute to the stage 2 assessment

### **Place making**

(Work to be undertaken externally)

55. It is proposed to issue a brief to a consultant to establish a baseline of existing streets and spaces using the Healthy Streets assessment tool. This analysis will then be redone for each of the shortlisted options. Healthy Streets assessments consider 10 criteria such as ease of crossing, noise, shade. This will help with the overall comparison pre and post scheme as well as subjective analysis of any timing or traffic mix change proposed as part of this review.

### **Signage – understanding**

56. Consideration of any proposal must take into account what can be legally signed, how easy the signage is to understand and how large signage might have to be (which has its own constraints). This is a practical consideration for any proposed change. Officers understand that some members have ongoing concerns about the signage but what is currently on street is the most suitable compliant option.

57. A further review will be considered at the stage 2 assessment.

### **Equalities Analysis**

(Work to be undertaken externally)

58. Review of the existing analysis highlighting any areas already covered that may support or oppose any change of timing or traffic mix on any particular arm.

59. This will contribute to the stage 1 assessment

60. Any proposals to be looked at in more detail during stage 2, a further analysis will be undertaken to assist design mitigation of any identified negative impacts and to inform public consultation.

61. A final Equality Analysis on any proposed option for change will be provided when presented to Members at Stage 3 (affectively gateway 5) and TfL for the TMAN application for final decisions.

### **Updated traffic and pedestrian count data**

62. It is anticipated that new traffic data to verify flows and composition will be needed to undertake the traffic modelling exercise. The extent of this is to be determined with the consultants and TfL. However, it looks to be in the region of 25 junctions that require collecting.

63. It is also proposed to update pedestrian flows at Bank. This will help both with the planning of the proposed construction work and in understanding volume of people moving through the space currently that could be impacted by any proposed changes. It is a suitable time to undertake these now that the Bank Blockade has concluded.

64. Counts need to be undertaken outside of school holidays and bank holidays and require the consultant to have the capacity and enough equipment to undertake all of the counts at the same time. It is intended that this work will be undertaken alongside the data collection exercise for the wider Traffic Order review being undertaken by the Strategic Transport team.

## **Stakeholder engagement and public consultation**

65. As the public consultation on the main All Change at Bank project in Summer 2021 showed, there are strong views held on the subject of access through Bank. Responses received showed no clear overall view, and the detailed analysis showed preferences for different options of mix and timing varied significantly depending on main mode of travel.
66. The public consultation exercise has the potential to be scrutinised. It is recommended that the public consultation planning, execution, and analysis is undertaken by a third party that can independently manage issues that may be contentious to ensure a representative response to the consultation.
67. This is going to be an important piece of work for the review and is likely to cost more than had originally been envisaged, however the additional cost is believed to be beneficial to ensure that the methodology and findings of the work are considered by all to be impartial and representative.
68. Wider engagement outside of the formal consultation process will largely be undertaken by Officers, particular with regards to local building occupiers, Ward Members and wider Member communication. However, the commissioned consultant will be asked to advise on wider stakeholder management during the review as part of their commission. Stakeholder engagement will be an ongoing process that runs throughout the programme.

## **Outline programme**

### Stage 1: Initial feasibility June to October 2022

*(effectively leading to a G3)*

- Commission various work streams
- Agree Traffic modelling expectations with TfL
- Undertake baseline review of data (including equalities) and collect new data where required
- Traffic model updated with new flows and composition for initial feasibility testing
- Independent review and matrix assessment

- Report back on progress to Streets and Walkways

## Stage 2: Shortlisted options for further investigation – November 2022 -January 2023

*(Effectively leading to a G4)*

- Initiate base and future base model audit with TfL
- Options retested and mitigation investigated on TFL agreed base model
- Review impacts on wider network and update matrix review where more detail has been obtained (Including equalities)
- Report back to Streets and Walkways on options with recommendations of any options to be put to forward to public consultation Public consultation exercise February- April 2023
- To be externally run and analysed
- Report back on outcome of consultation and recommendations for taking (if any) a preferred option forward

## Stage 3: Detailed design May 2023 -October 2023

*(Effectively leading to a G5)*

- Proposed scheme to TfL for Audit and scheme impact assessment
- Finalise Equalities Analysis, Road Safety Audit if required,
- Submission for TMAN approval
- Advertise statutory traffic management orders for consultation
- Report back on TfL approvals and any objections to the traffic orders and if appropriate seek approval to make the orders and implement the changes at the appropriate time.

69. The indicative time frames rely on external resource being available at TfL and that the proposed way forward in terms of traffic modelling as set out here is the approach that is agreed with TfL through the 'modelling expectations' document.

70. This programme is also based on the assumption that Committee approvals remain with either Streets and Walkways or Planning Committee. If additional committees, such as Policy and Resources or Court of Common Council are required to approve the various stages, then this will add some delay in to the indicative programme depending upon the timing of each committee etc. It is assumed that the reports would go to Operational Property and Projects Sub as required regarding the project management process of the review.



## Risks

71. Undertaking this review at this time adds in additional risks to the accuracy of the modelling work given the key dependencies on TfL's Bishopsgate and London Bridge ETOs. At present taxi access is not included within TfL's proposal but it is possible that there will be changes made to the restrictions if made permanent. The restrictions could also be removed entirely. If a change is made to these restrictions, we may need to return and redo the traffic modelling to account for this.
72. As with all projects that are introducing traffic orders there is always a risk of Legal challenge. If this occurs, then there would be a significant delay to programme.

## Appendix:

Appendix A – plans of approved design and restrictions

Appendix B – Strategic Road Network

Appendix C – Route options matrix

Appendix D – [a link to previous work undertaken on timing review](#) in February 2021.

## **Appendix A – plans of approved design and restrictions**
















First plan – The All Change at Bank agreed design.

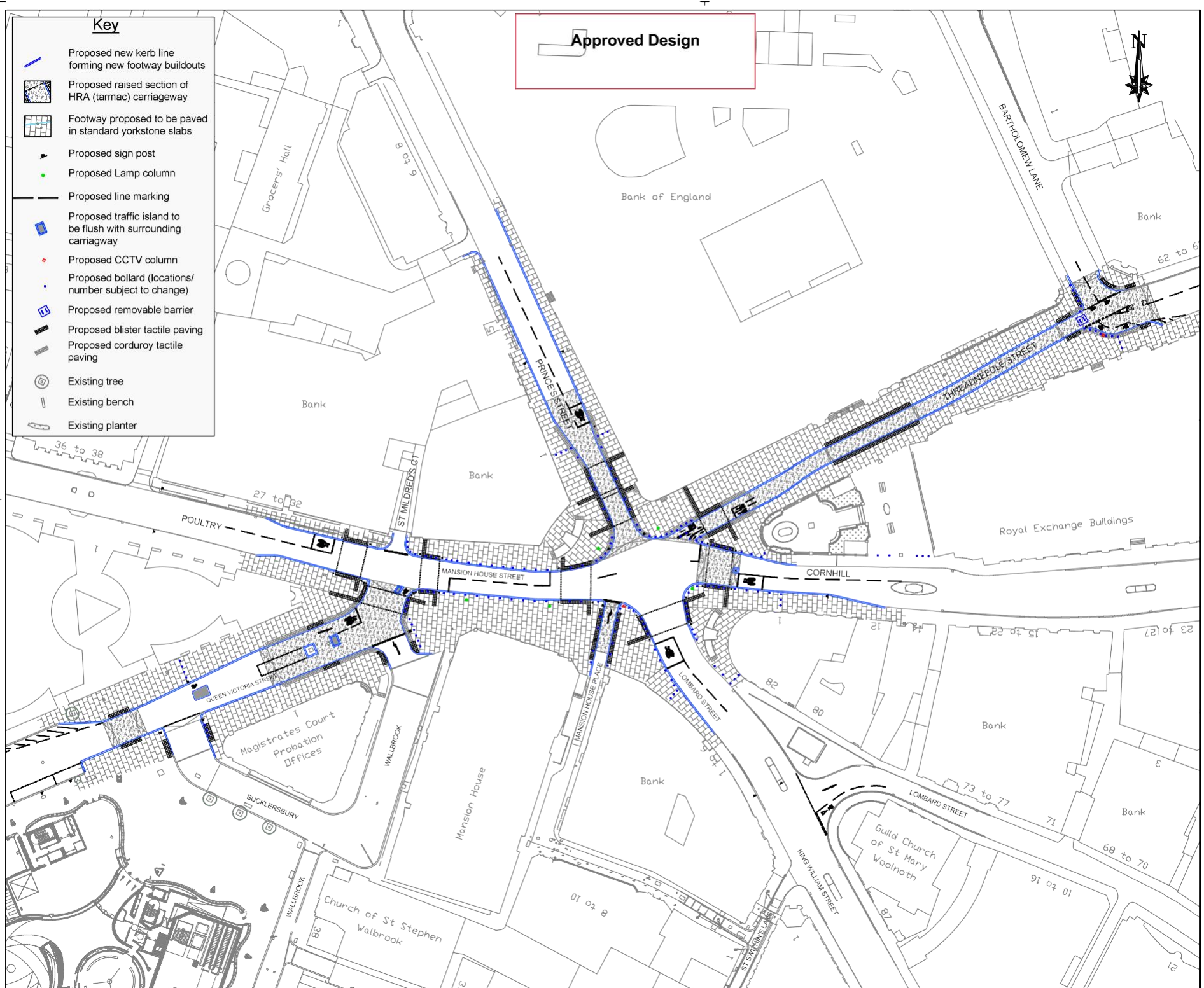
Second Plan – illustration of the different restrictions.

DRAFT






# Approved Design

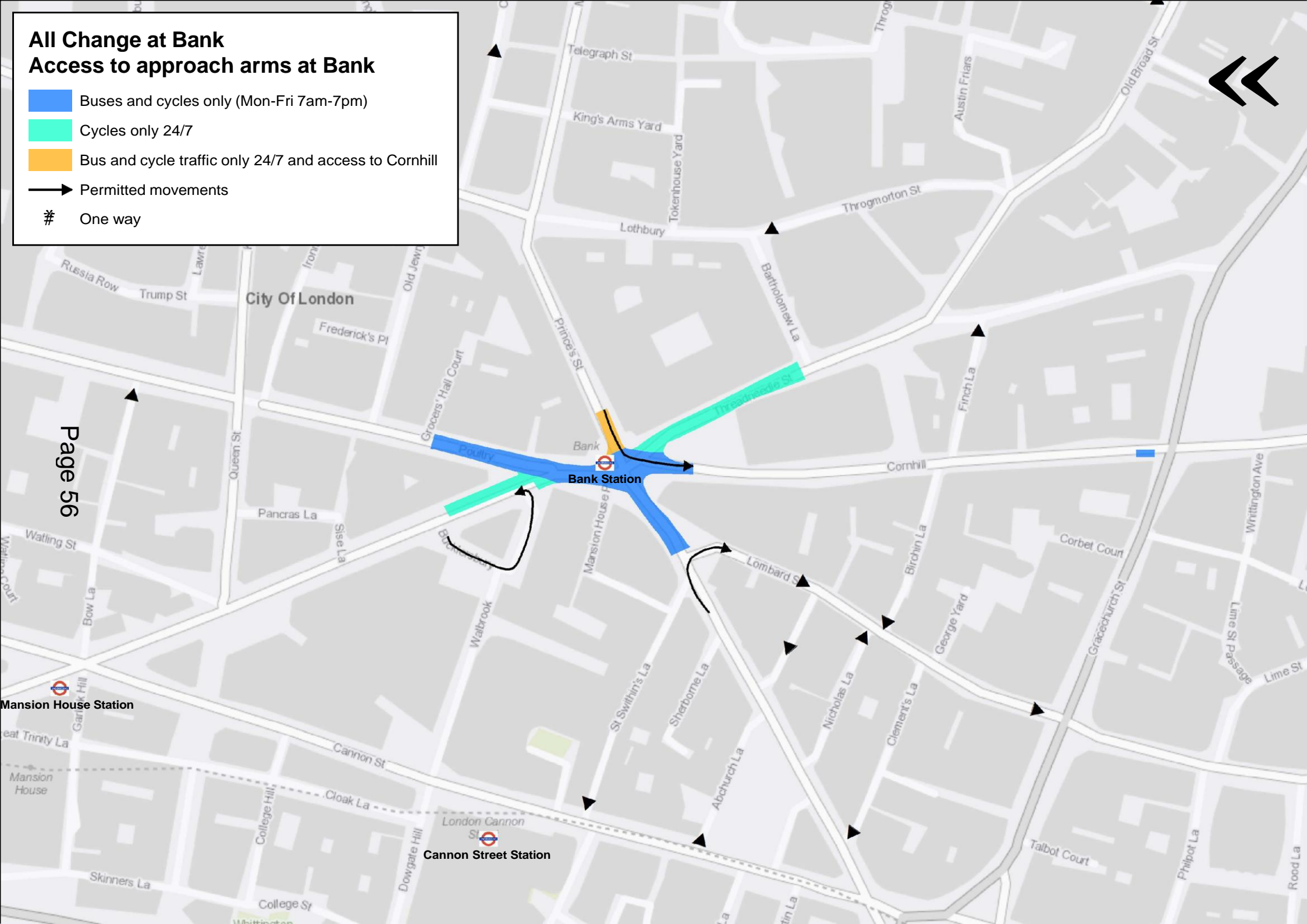
## Key

-  Proposed new kerb line forming new footway buildouts
-  Proposed raised section of HRA (tarmac) carriageway
-  Footway proposed to be paved in standard yorkstone slabs
-  Proposed sign post
-  Proposed Lamp column
-  Proposed line marking
-  Proposed traffic island to be flush with surrounding carriageway
-  Proposed CCTV column
-  Proposed bollard (locations/number subject to change)
-  Proposed removable barrier
-  Proposed blister tactile paving
-  Proposed corduroy tactile paving
-  Existing tree
-  Existing bench
-  Existing planter



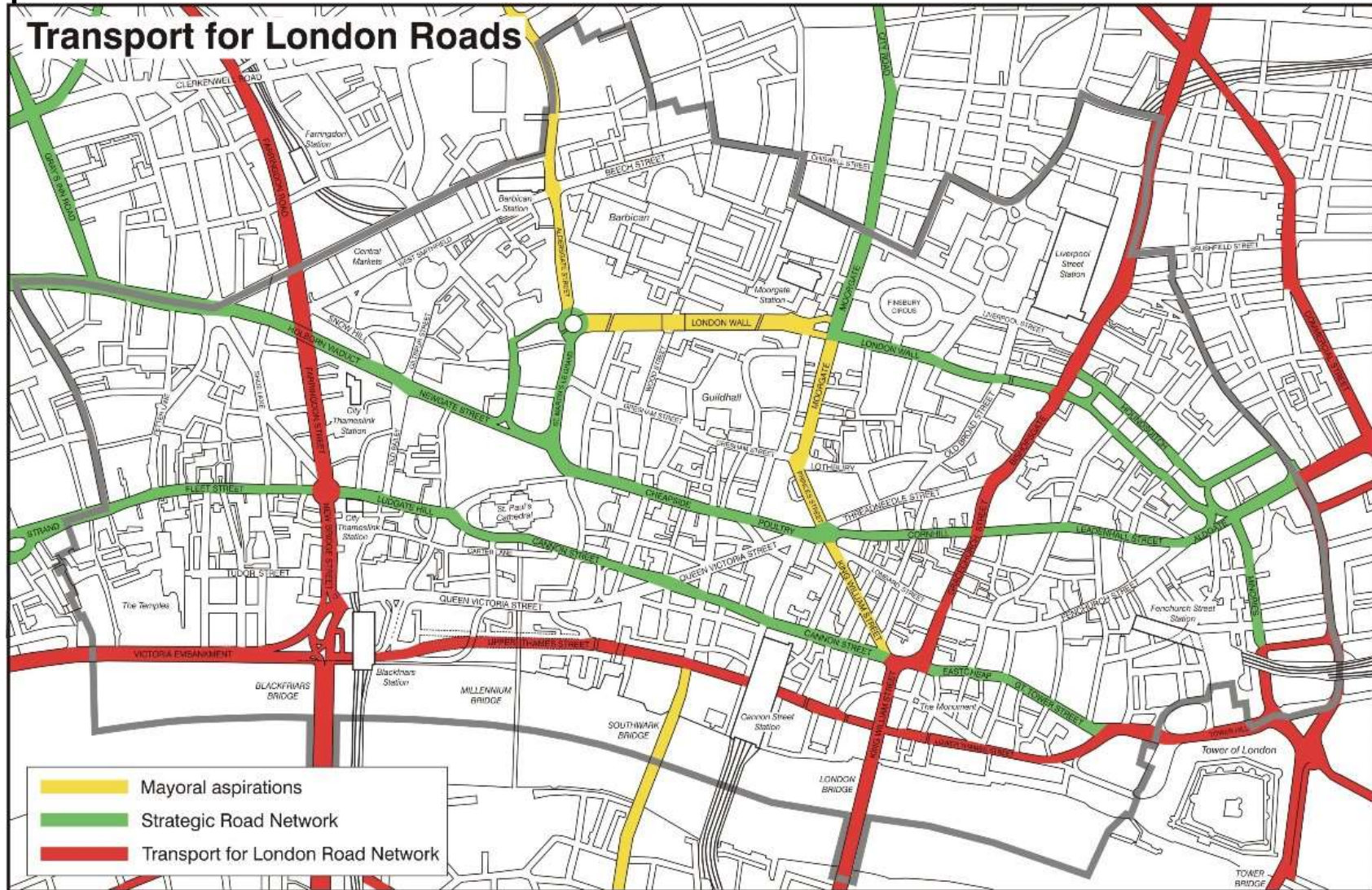
## All Change at Bank Access to approach arms at Bank

-  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





# Appendix B



## Appendix C

### Possible movement options for vehicles on Cornhill, Poultry and Lombard/King William Street

Key							
the arm direction is open for vehicles							
the arm direction is restricted to vehicles							
Scenario		Cornhill		Poultry		Lombard/King William	
		Westbound	Eastbound	Eastbound	Westbound	Northbound	Southbound
		Entry	Exit	Entry	Exit	Entry	Exit
All arms open to enter junction	1						
	2						
	3						
	4						
	5						
	6						
	7						
No access to junction via King William Street	8						
	9						
	10						
	11						
	12						
No access to junction via Poultry	13						
	14						
	15						
	16						
	17						
No access to junction via Cornhill	18						
	19						
	20						
	21						
	22						
Access to junction by Poultry only	23						
	24						
	25						
Access to junction by Cornhill only	26						
	27						
	28						
Access to junction by King William Street only	29						
	30						
	31						

<b>Committee(s):</b> Streets and Walkways Sub Committee	<b>Dated:</b> 31 May 2022
<b>Subject:</b> All Change at Bank – Traffic Orders Objection Report	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1,9,11,12
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>TfL/S106/Capital</b>
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>Y</b>
<b>Report of:</b> Executive Director Environment	<b>For Decision</b>
<b>Report author:</b> Gillian Howard, Environment Department	

## Summary

Approval was given in September 2021 to advertise the statutory notices for the traffic orders at Bank to support the All Change at Bank Project. The consultation process returned 10 responses. Of these, seven were formally treated as objections to the traffic orders.

Most of the objection points centred around issues which had been raised in the public consultation exercise and reported in September 2021 Committee reports. Members considered these points when they agreed to proceed to the statutory consultation and advertising of the individual traffic orders.

Therefore, whilst there is some further detail and discussion on these points contained in this report, to ensure that a robust decision can be taken, there are no new arguments presented, that Officers consider significant enough to warrant changing the detailed design proposed (and therefore the proposed traffic orders) or which officers believe should prevent the orders from proceeding.

Officers have also considered the requirement for referring the orders to a Public Inquiry and do not believe that it would be in the public's interest to do so, having regard to the costs and delay to the project relative to risk, and so are not recommending that an inquiry is held. No objections specifying concerns about waiting and loading restrictions have been identified as part of the objections received and this does not appear to be an area of concern for the objectors.

## **Recommendation(s)**

Members are asked to:

- Note the report.
- Agree that in this instance no public inquiry is necessary before making the orders;
- Consider the objections received and endorse that the traffic orders related to the All Change at Bank project be approved to be 'made', taking into consideration the objections received to the traffic orders as detailed below;
- Agree the modification of the proposed 'at anytime' loading restriction in Mansion House Place be modified from the advertised 15.6m to 15m at the junction with Mansion House Street; and
- Note that on this basis, construction of the All Change at Bank project will commence in the Autumn of 2022, subject to no legal challenge being filed.

## **Main Report**

### **Background**

1. In December 2021, as part of the Gateway 5 report, it was resolved by the Streets and Walkways Committee to delegate consideration of any objections to the traffic orders to the Chief Officer in consultation with the Chairman and Deputy of Streets and Walkways. Depending on the issues raised in any objections, delegated authority was given to the Executive Director Environment to take a decision whether a public inquiry should be held. It was anticipated that a delegated report would be considered in January 2022. The delegation was agreed to allow for the pace of programme considering the spacing of the committees. Due to some of the objections received being lengthy and requiring significantly more time to fully consider their relevance, it was not possible to meet the anticipated time frame or the subsequent February committee.
2. Following the local election and the subsequent motion to Court of Common Council regarding Traffic Orders as across the City, and specifically traffic movement through Bank, this report was paused subject to the outcome of that debate.
3. Due to these issues, and in order to make the decision-making process more transparent, this report has been prepared for full consideration by the Streets and Walkways Sub Committee, rather than proceeding under the approved delegation. Members should consider Appendix 5 in their decision making, which is exempt from the public papers due to legal privilege.
4. The traffic orders relating to the All Change at Bank project were published on 10 November 2021 and the Statutory consultation period ended on 3 December 2021. 10 consultation responses were received.
5. One comment from the City of London's Access Team was received related to the design of tactile paving, which has already been covered in the detailed design process.
6. Of the remaining nine responses, four were originally treated as comments as they provided little information on their grounds for objection. These respondents



were contacted to explain that their response was being considered as a comment rather than a formal objection, and to advise that if they wished to object then they needed to respond and state the grounds for their objection.

7. Two of the four responded stating that their comment was to be treated as an objection and provided some further information to clarify the grounds. This has resulted in seven formal objections to the traffic orders.
8. The two comments are one sentence each stating that taxis are part of Transport for London and should therefore be able to access to Bank at all times. Whilst these two comments were not treated as formal objections the issue of taxi access is covered by other objectors in more detail and is responded to below.
9. The responses which are being treated as objections (seven responses) can be found in Appendix 1. Appendix 2 details the remaining comments that were received.

#### Consideration of whether a Public Inquiry should be held

10. After reviewing the responses, officers are of the view that none of the objections are so significant to warrant a recommendation to call a public inquiry. The statutory consultation was preceded by significant stakeholder engagement and public non-statutory consultation. This engagement and consultation took place during the formulation of the proposals. The level of engagement with organisations and stakeholders was significant and resulted in design modifications being made. The non-statutory consultation attracted in excess of 3,500 responses (further details of this consultation are provided later in this report). The final statutory consultation has been carried out and in response to this, detailed objections have been received, which allow officers and members to fully understand the issues and concerns and to consider these fully. This report reviews the objections and provides feedback on the points to be considered by the Committee before determining whether to uphold any of the objections, or whether to proceed with making the traffic orders.
11. Whilst in most situations there is a discretion whether to hold a public inquiry in advance of making a traffic order, the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ("the 1996 Regulations") set out some circumstances where a public inquiry must be held. If there is no mandatory requirement to hold a public inquiry, the City Corporation are still required to consider whether one should be held.
12. Regulation 9 of the 1996 Regulations sets out two situations where the City Corporation would be required to cause a public inquiry to be held:
  - Where an objection has been lodged where the traffic orders would have the effect of prohibiting the loading or unloading of vehicles or vehicles of any class in a road on any day of the week: either At all times, Before 07:00, between 10:00 and 16:00 hours or after 19:00 hours
  - Where the order(s) prohibit or restrict the passage of public service vehicles by the operator of a local service along the route which includes the road and an objection has been made by the operator of a London bus service the route of which includes that road or by Transport for London.
13. There is, under regulation 9, the requirement in the first bullet point above is subject to an exemption whereby the restrictions are within 15m of a road junction, unless the effect of the order in addition to existing restrictions prohibits

loading or unloading of vehicles by any class for a total distance of 30m out of 50m.

14. In order to remain within the exemption above, it is recommended that the proposed loading restriction on Mansion House Street be reduced by 0.6m from the 15.6m advertised. This will not impact on the project objectives or make a substantial change in the order or its effect. The City Corporation have power to modify an order whether in consequence of an objection or otherwise, before it is made. Officers consider that the objects of the order would still be achieved by a no waiting restriction on Mansion House Place, for a length of 15m. A duty to consult arises when the modifications proposed appear to the order making authority to make a substantial change in the order. Officers do not consider that the reduction of length of the no waiting restriction from 15.6m to 15m would make a substantial change to the order.
15. None of the objections received specify loading as an issue, and there have been no objections by operators of a London bus service or from Transport for London (TfL). Officers are therefore of the view that taking the proposed changes as a whole, including considering the existing restrictions in place, that with the proposed amendment to the order in respect of Mansion House Street, that the orders do not fall within the categories set out in Regulation 9 and that a public inquiry does not have to be held.
16. The City Corporation may still decide to hold a public inquiry. Overall, Officers do not believe that it would be in the public's interest to seek an inquiry having regard to the costs and delay to the project and so are not recommending this course of action.

### **Current Position – The Objections**

17. There were detailed objections from three organisations representing the views of taxi drivers (two responses) and powered two wheelers (PTW) (one response). Four less detailed objections were also received.
18. Of the four less detailed objections, the summary grounds for objections are that:
  - the proposals will cause more traffic and pollution (covered in objection 2)
  - licensed taxis should be permitted at all times (covered in objection 4)
  - negative impact on disabled people (covered in objection 3)
  - consultation not undertaken transparently (covered in objection 5)
19. The first three points were issues raised in the public consultation exercise and reported to Committees in September 2021, prior to the decision to proceed with the traffic orders to statutory consultation was taken. These issues are also largely included in the more detailed objections and responses will be covered in the next section.

20. Of the three substantive objections received, the summary grounds for objection are:

1. Proposals would make the surrounding area difficult to navigate for taxis/Powered Two Wheelers (PTW)
2. Object to a permanent order being made without adequate assessment of the traffic mix and further consideration of TfL's proposals for Bishopsgate and its cumulative impact
3. Impact the proposals would have on disabled people and therefore the City Corporation is not fulfilling its Public Sector Equalities Duty.
4. Request that taxis are allowed across the junction at all times
5. The way the views of drivers and passengers of taxis were dealt with in the public consultation exercise/inadequate consultation
6. Influence of the pandemic and whether this proposal is still needed
7. Lack of data evidence in the statement of reasons.

21. Across the three detailed objections there are other points raised, but those cover the critical points in relation to the decision to proceed with the finalisation of the proposed traffic orders.

22. The table summarises the objections each objector raised.

	<b>Main Objection points</b>						
	1	2	3	4	5	6	7
<b>Comments relate to</b>							
<i>Correspondence 1</i>				X			
<i>Correspondence 2</i>				x			
City of London Access Team							
<b>Less detailed objections</b>							
Objector A			x	x	x		
Objector B			x	x			
Objector C			x	x			
Objector D				x			
<b>Detailed Objections</b>							
LTDA (group)	x	x	x	x			
United Cabbies (group)		x	x	x	x		
MAG (group)	x				x	x	x

In terms of responding to these areas of objections:

**Objection 1: Making the area more difficult to navigate:**

23. There are various strands to this. Firstly, the proposed traffic orders do not propose to change the current situation for traffic (other than buses and cycles) during Monday to Friday, 7am to 7pm. The impacts on bus passengers, who are rerouted from Queen Victoria Street and/or Threadneedle Street, are addressed in the September 2021 public consultation findings report.

24. Outside of the existing restricted times, there will be an impact on evening and weekend route choices. The proposals maintain all traffic access on Cornhill,

Poultry and King William Street in the evening and at weekends. There is however no full north-south route through the junction available to all traffic, except for buses and cycles.

25. This restriction is to accommodate the reduced carriageway width at the southern end of Princes Street which provides the larger pavement space around the Underground entrances. Vehicles will be able to travel southbound on Princes Street to access Cornhill, however the compulsory left turn will be effective at all times.
26. There is therefore an impact on evening (after 7pm) and weekend route options. The scheme has been traffic modelled for peak hours (using 2019 traffic flows) to ensure that the proposals work with the largest volume of traffic. After 7pm, traffic volumes in the City are usually lower. The loss of the north-south route for general traffic through Bank after 7pm, and at weekends, is compensated by the fact that Bishopsgate remains open at these times under the current TfL experimental traffic order. There is therefore a reasonable alternative route in the evening and at weekends.
27. With regards to the proposed closure of the small sections of Queen Victoria Street and Threadneedle Street; there are nearby alternative routes available which provide access to the remainder of these streets, and particularly after 7pm and at weekends when vehicles can currently use these sections of street. For example, the alternative for travelling through the junction eastbound is either:
  - Queen Street, King Street, Gresham Street, Lothbury, Bartholomew Lane and then eastbound onto Threadneedle Street for access to Old Broad Street (NB only) to London Wall/Wormwood Street.
  - Queen Street, Poultry, across the junction into Cornhill and out towards Leadenhall Street for access to the City Cluster and Aldgate (after 7pm only).
28. The streets leading to Bank are classed as Local Access Streets in the City's street hierarchy (set out in the adopted Transport Strategy) and should not be being used for through movement across the City at any time of the day.
29. As noted, the proposals do change routing options, in particular after 7pm and at weekends. This does reduce route choice but aligns with the City's street hierarchy. The most significant impact on route choice is the loss of the north-south route through Bank after 7pm and at weekends. However, the Bishopsgate Corridor is open at these times, and access to Princes Street remains via either King Street, Gresham Street or Bartholomew Lane, Lothbury or from Moorgate. Vehicles can exit southbound via Cornhill or turn around in Princes Street (prior to the enforcement signage to the south of the entrance to the Ned hotel) or exit Grocers Hall courtyard and exit to the north of Princes Street. With the lighter traffic flows, alternative route journey times are not expected to be significant.
30. The cumulative impact of a number of new and proposed traffic schemes in the local area does result in reduced route choices. In isolation, the impact of the All Change at Bank proposals on navigation is relatively small, particularly when balanced with the benefits that can be gained for people walking, air quality and safety. But there are some negative impacts. The cumulative impact should be considered, however the experimental schemes are currently existing with the current restrictions at Bank, and officers will report back on how they operate and any further mitigation that may be required if they are to be considered as permanent features. The Bank scheme has been through extensive approvals

and scrutiny in its design and preparation, and it would be unreasonable to delay the project construction and realising its benefits until after the experimental schemes had all concluded.

Objection 2: Cumulative impact of the proposed changes with other changes – such as Bishopsgate.

31. The key issue is the viability of the Bishopsgate and London Bridge experiments with the existing Bank restrictions of buses and cycles only Monday to Friday 7am to 7pm (regardless of the proposed changes to which the traffic order consultation relates).
32. The Bishopsgate corridor provided an alternative route for traffic avoiding Bank when the original restrictions were implemented in May 2017. It provided the closest north-south route on City access streets for all traffic, whilst Cannon Street and London Wall provided east west corridors.
33. The current traffic experiments introduced by TfL on Bishopsgate and London Bridge mean that this route is also restricted during Monday to Friday, 7am to 7pm. Regardless of whether the All Change at Bank scheme progresses, the TfL experimental schemes need to prove that they can satisfactorily operate with the existing Bank restrictions in place.
34. The London Bridge experiment allows taxis and PTWs, in addition to buses and cycles, to travel over London Bridge in both directions. However, when they arrive at Monument junction, taxis and PTW can then only travel east or westbound along Eastcheap or Cannon Street. King William Street currently has a 'no motor vehicle restriction except for buses, access to off street premises and loading Monday to Friday 7am to 7pm'. This is remaining in place as an experiment as part of the City's Pedestrian Priority Programme and will be monitored.
35. There is an impact on journey times for some journeys during the Monday to Friday 7am to 7pm restricted times. For example, if trying to get to Liverpool Street station from London Bridge station by taxi, the journey distance is now further with subsequent journey time and taxi fare increases. However, this is an issue for TfL to monitor as part of their traffic order experiment process and, if necessary, propose mitigation if required. As discussed above, after 7pm and at weekends there is an alternative north-south route for all vehicles along the Bishopsgate corridor.
36. The City's experimental traffic orders under the Pedestrian Priority Programme that are in operation close to Bank, also have impacts. If using Gresham Street in an eastbound direction, the operation of King Street northbound only for motor vehicles makes little difference to the previous arrangement. However, vehicles heading westbound and using Gresham Street to avoid Bank, and wanting to get to Bloomberg for example, cannot go southbound from Gresham Street until either Foster Lane or St Martin's Le Grand. This is quite a long detour in comparison to when the original Bank on Safety measures were implemented.
37. With the Bank proposals in place, after 7pm and at weekends, there are limited route choices if you were on Moorgate and for example, wanted to get to Bloomberg offices in a motor vehicle. With Princes Street only being used by other vehicles to access Cornhill in the proposed design at any time, the route requires a detour via Gresham Street and Foster Lane or St Martin Le Grand. This is one example of a specific journey where the route would be longer.

However, for people who were genuinely heading west, for example towards St Pauls or Fleet Street there would be little difference in the journey time as a result of not being able to head south from Gresham Street until St Martin Le Grand.

38. As with the TfL experimental scheme on Bishopsgate, the impacts and the changes delivered through the Pedestrian Priority Programme need to be monitored and considered as part of the experimental traffic order process.
39. Without further mitigation, or decision to not proceed with some of the experimental schemes following consultation and monitoring, there may be some specific route choices which are limited and will take longer due to the cumulative effect of schemes. But in these circumstances the cumulative benefit of the changes made by the experimental schemes and Bank must also be weighed up in the considerations.
40. This was not an unknown factor in deciding to proceed with the proposals following the consultation report in September and the Gateway 5 report in December 2021. Those reports outlined that the All Change at Bank Project was the City's priority for change given the benefits for people walking, improving safety and linking to the Bank Station Capacity upgrade. Our own temporary and experimental schemes are being monitored and can be adjusted or removed if the evidence collated indicates that they cannot work well in their current form with the Bank project. In addition, TfL accepted that All Change at Bank was the priority as it had gone through the full due process of a permanent scheme which included the traffic management (TMAN) scheme approval.
41. The Bishopsgate/London Bridge schemes are also being monitored, and the City is a statutory consultee whereby we can lobby for either changes to the experiment, or if it were necessary, we could object.
42. Whilst there may be a cumulative impact of change, it is felt that this is being managed as well as it can be to continue to deliver change that is needed, and has been in planning for several years. The schemes that are yet to be decided upon have to prove that they meet their objectives and that the network is not unduly impacted as part of their own considerations of Section 122 of the Road Traffic Regulation Act (see paragraph 90). Therefore, delaying the progression of the All Change at Bank Project to wait and see what the other schemes decide to do, which are yet to prove their impacts and their benefits, would be detrimental to the wider public benefit of implementing the designed changes at Bank which greatly assist the largest mode of travel, which is people walking.

### Objection 3: Public Sector Equalities Duty/ impact on disabled people

43. The impact on disabled people, and other protected characteristics, has been widely covered in the committee reports to date including the full Equalities Analysis in the Gateway 5 report in December 2021. This Equalities Analysis is attached at Appendix 3.
44. There are some negative impacts of the proposals which have been given due consideration and mitigated as far as possible, whilst also recognising the positive impacts that are also delivered by the scheme.
45. Extracts from the independent Equalities Analysis found:

*“Overall, the number of people who will benefit from the changes is likely to greatly outweigh those under certain PCGs who may be negatively impacted*

*The primary cause of negative impact upon PCGs is due to the alteration of bus routes, and inaccessibility to be picked-up or dropped-off by motor vehicles on Threadneedle Street or Queen Victoria Street in the same locations as was previously possible. While taxis will not be able to drop off or collect passengers from Threadneedle, it should be*

1. *noted the entrances into the units of the Royal Exchange on this section are currently not accessible for all users. Stakeholder feedback from the Bank of England didn't highlight an issue with the additional distances to travel to the drop off/ pick up locations for taxis."*
  2. *"Due to the limited space available at Bank junction, designing a scheme that perfectly satisfies the specific needs of every stakeholder would be an unachievable aim. As such, the All Change at Bank scheme has been designed in a way which finely balances the needs of all, while taking into account the specific needs of each PCG. It is recommended that ongoing collaboration with stakeholders takes place to ensure that the scheme can be implemented in way in which maximises benefits and minimises negative impacts on PCGs"*
46. An equalities analysis action plan has been developed for ongoing consideration during delivery and monitoring of the scheme based on the findings of the Equalities Analysis. Ongoing work with Transport for All and the City's Access Group will also continue during construction to limit negative impacts of construction activity for those people who may be disabled or less mobile, should it be agreed to proceed.
47. The issues raised in the objections largely refer to disabled people and their use of taxis, the need for door-to-door access and concern that those people with protected characteristics that are unable to use public transport and rely upon taxis were being disadvantaged by the proposals.
48. Again, these issues were discussed in detail in the consultation findings report in September 2021, prior to the agreement to advertise the traffic orders. Since then, the finalised Equalities Analysis for the proposals has been presented. In considering the Gateway 5 report, it concludes that:

*"due regard to the City's statutory duties has been given including: maintaining reasonable access to premises, improving amenity, having regard to the national air quality strategy, facilitating bus traffic and securing the safety and convenience of passengers and other road users. Due regard has been paid to the City's public-sector equality duties and the interests of those with protected characteristics"*

49. In the LTDA's response they raised a concern that:

*"Not permitting licensed taxi access would mean that they are forced to take long diversions, which would make fares more expensive and journeys significantly longer. This is not only damaging for the taxi trade – making taxis less competitive and appealing to passengers – but would also put passengers for whom taxis are the only means of travel, including protected groups such as elderly and disabled people, at an unfair disadvantage and we believe would contravene the Public Sector Equality Duty, as set out in the 2010 Equality Act."*

In specific response to the concerns raised and given the importance of the Public Sector Equality Duty, it is acknowledged that there remain some negative outcomes with the proposals for All Change at Bank, one of which is that some journeys by vehicles will take longer and therefore may cost more. This was an acknowledged consequence of the existing restrictions, and our current proposals will extend that after 7pm and at weekends for some journeys, particularly for those that would have used Princes Street to access other parts of the area.

50. However due regard has been given to all aspects during the design process and impacts have been mitigated as far as possible. This process has been referenced throughout the decision-making process. Access to buildings by vehicles for pick up and drop off is retained as is now, other than the short stretch of Threadneedle Street for the Bank of England and some of the shops fronting the Royal Exchange which have steps to enter them. It is also important to note the benefits that are achieved and enhance the environment for those people with protected characteristics by the designed changes. For those people who are in the space and may have arrived by bus, tube or train they will have the space to travel at their own pace, better crossing facilities with wider waiting areas and shorter crossing distances, improved pedestrian comfort levels and greater opportunity to stop and rest where needed or desired. The cycle facilities have been designed with the use of adapted cycles in mind and the carriageway space reduced simplifying movement and giving clearer indications as to where traffic is going, which will improve safety. It is not possible to resolve all issues but there has been significant work undertaken in this area to finely balance requirements and advance equality of opportunity at Bank.

#### Objection 4: Request that taxis are allowed across the junction at all times

51. The most common ground for objection, and comment, related to restrictions on access for taxis across Bank Junction. This is an area that has been discussed in detail in previous reports and there will be a review of the traffic mix and the timings of restrictions on Poultry, Cornhill and King William Street. This will include an assessment of whether post pandemic flows provide greater opportunity to be more flexible and for the project objectives still to be met.
52. Previously Streets and Walkways Committee had agreed that a review of vehicles permitted through Bank, and a review of timings of the restrictions would be undertaken within 12 months of the traffic related changes to the junction being completed, if not before.
53. In April, Court of Common Council requested that this review commence imminently, and this committee is also receiving a paper setting out the proposed approach to this review for approval. Any alternative timings and or traffic mix would be subject to consultation and TfL and City Corporation approvals.
54. The mix of traffic through the junction is understood to be a key consideration for the taxi trade and their passengers. This was clearly articulated in their response to the public consultation and acknowledged in the discussion of the consultation findings.
55. There was no specific objection raised to the sections of closure of Queen Victoria Street or Threadneedle Street in the responses.



56. The LTDA argued that consideration should be given to allowing taxis full access to Princes Street on the basis that taxis should have the same access as buses. Although not originally included, this will be added to the scope of the planned review as a sensitivity test.
57. Despite the review taking place earlier than had been envisaged at the Gateway 5 report in December, it is still recommended that the current traffic orders (other than making the modification to the loading on Mansion House Place) proceed to allow the construction of the scheme to get underway. These traffic orders relate to the 'end product' of the scheme. Should an alternative mix of traffic or timing be proposed to proceed by the review, then new traffic orders can be advertised, and the signage detail changed. Physical intervention to the design should not be required (other than very minor) given that the restrictions on three of the arms are part time, allowing all types of vehicles to move through the space after 7pm and at weekends. Delaying the construction until the timing and traffic mix review has completed will only delay the ability to action its findings. Therefore, this objection is being considered in terms of its content, but it is not recommended that the objection is upheld and the project delayed until the review is completed.

Objection 5: The way the views of drivers and passengers of taxis were dealt with in the public consultation exercise/inadequate consultation

58. This is an area that doesn't directly relate to the statutory consultation of the traffic orders. However, it is important to clarify as the earlier non-statutory consultation informed the decision to proceed to advertise and carry out the statutory consultation of the traffic orders.
59. The consultation report separated out responses from taxi and private hire drivers and their passengers (which dominated the overall response) to allow the views of the other 50% of respondents to be more clearly identified and understood. The view of drivers and their passengers were largely unanimous, and these were clearly captured and reported on within the consultation findings report. Views were not dismissed or ignored within the report and the analysis of the consultation report was discussed and debated at Committee.
60. The key comments discussed in detail in the September 2021 consultation findings report were:
- Taxi access
  - Taxi access to support access for disabled people
  - Journey time/congestion/navigation
  - Timing of the project (impact of COVID)
61. These points have all been raised again in this statutory consultation response and further commentary provided.
62. MAG commented regarding the inadequacy of consultation. They stated that the *"plans also represent the effective step by step creeping pedestrianisation of what is the key junction within the City without a large scale formal consent process involving the broader range of constituent users"* and therefore making *"it*

*easier than normal for the City planning team to implement changes without a wider debate or proportionate mandate.”*

63. The All Change at Bank project was initiated in 2013 and has had ongoing discussions of the aspirations of this project throughout its lifecycle with stakeholders. Even through the previous project, Bank on Safety, which introduced the experimental orders to make the junction buses and cycles only Monday to Friday 7am to 7pm, the aspiration that there would be a further permanent scheme involving physical changes and space reallocation has always been clear.
64. In terms of comments regarding transparency and adequacy of consultation, public consultation on the design was launched on Monday 29 March 2021 and ran for six weeks, with the online survey closing on Monday 10 May. The online consultation survey page was viewed 39,570 times and resulted in 3,574 completed survey responses. In addition to the survey, responses were also received from 16 businesses/organisations and 29 emailed individual responses. This was reported on in September 2021. The decision to proceed to the statutory traffic order consultation was taken at this stage after consideration of the public consultation comments.
65. The public consultation did take place during a period of national Covid-19 restrictions, but other methods to reach local workers who may have been working from home were employed. We undertook a geographically targeted social media campaign. This succeeded in bringing 24,134 people to the survey page. The social media adverts were shown to 827,235 individuals at least once, with the advert being viewed over 2 million times across the different social media platforms. This was in addition to utilising other methods to reach as many people who may be interested as possible. The volume of responses and number of views of the page suggest that knowledge of the consultation was high.
66. The statutory traffic order consultation was advertised in local newspapers and by site notices as well as notifications to the statutory list of consultees. The statutory consultation followed the process prescribed by the Regulations.

Objection 6: Influence of the pandemic and whether this proposal is still needed

67. This was an area of concern raised by the Motorcycle Action Group (MAG) in this consultation and was addressed in the September 2021 consultation findings report. We accept that there is uncertainty around future work patterns and how hybrid working might evolve. The All Change at Bank scheme not only provides for improvements to and expansion of the local public transport network, with associated increases in people largely walking and cycling the last part of their journey, but also provides relief from years of growth in the area which has not yet been accommodated by changes to the layout at Bank.
68. When this project was first initiated in 2013, the numbers of workers in the City was set to grow to 428,000 by 2026, This had been exceeded by 2019. Even with a general reduction in daily footfall, the old layout of the junction would not be fit for purpose.
69. The proposed layout protects all users as well as providing space for to make walking through the area more comfortable and provides the opportunity for some greening in support of the City's Climate Action Strategy. The space may not be used as fully as intended immediately after completion, but it will provide for future growth. There is significant permitted development in the surrounding area

which is likely to result in increased footfall through Bank and to and from the station in the coming years.

70. With all available information at this time regarding recovery from the pandemic, as well as the encouragement of Corporate activities such as Square Smile, welcoming people back to the City for both work and leisure purposes; and considering support by businesses and the BIDS for changes to our public spaces and improving peoples experiences of using our streets, it is still the recommendation that the project should proceed to cater for future needs and growth.

#### Objection 7: Lack of data evidence in the statement of reasons.

71. The MAG response raised a concern about the statement of reasons and the focus on improvements for people walking.
72. People walking are by far the largest number of users of the junction. Pre-pandemic, and even prior to Bank on Safety, the numbers of people walking significantly outweighed any other road user. The junction is situated above the one of the busiest underground stations in London, and therefore has a very large number of people entering and exiting the station around the junction. Therefore, in line with our traffic management duty, the expeditious, safe, and convenient movement of pedestrian traffic is the primary focus of the project.
73. MAG raised a concern that *“no data is provided to back these statements or to explain the merits of the scheme relative to its trade-offs”*. Data has been made available at various points of the project development. To accompany the public consultation, information packs detailing the background, the proposals, and the benefits and impacts were made available. These contained data on both casualties and air quality. Casualty information was also included in the Equality Analysis.
74. Prior to the design being consulted on, the Gateway 4c report in February 2021 contained casualty information relating to the review of whether to consult on extending or reducing the hours of operation of proposed retention of the daytime restrictions. This concluded that the timings of the restriction should not be reduced, but views should be sought on extending the hours of operation. There is a lag in casualty data being released and therefore it does take some time to be able to assess impacts of interventions and to see trends.
75. The argument that people walking have already been *“well prioritised at Bank including the current timed access arrangements for vehicular traffic and the pavement widening/ road narrowing and simplification that has taken place in recent years”* is not correct. The timing restriction provided a safer environment, but no more space. The temporary widening using scan kerbs (stick down) and laying concrete slabs on the carriageway to make temporary pavements is an enhancement in space but was done as a temporary measure until an engineered physical solution to address the junction as a whole was developed (to account for drainage, lighting and shallow depth issues as a few of the constraints of redesigning the junction). The positioning of the Bank underground station entrances and exits around the junction necessitates a better provision for people walking to access and egress the station safely as well as for those people walking through the area to other stations and destinations.

#### Summary conclusions:

76. Regarding objection 1, the cumulative impact of a number of new and proposed traffic schemes in the local area does result in reduced route choices, and therefore navigation for motor vehicles during the day. Out of hours when the impact of the changes at Bank will impact general motor vehicle movement (during the day only buses and cycles have been able to cross the junction since May 2017), the route choice is comparatively improved as other timed schemes will not be operational. In isolation, the impact of the All Change at Bank proposals on navigation is relatively small, particularly when balanced with the benefits that can be gained for people walking, air quality and safety. The focus of ensuring the impact on route choice and navigation largely remains with the monitoring and any subsequent adaptations to the experimental schemes, as outlined in objection 2. On these grounds as outlined in paragraphs 23- 30 it is not recommended to uphold this objection.
77. Regarding objection 2 and the impact of the cumulation of changes including Bishopsgate; This was not an unknown factor in deciding to proceed with the proposals to statutory consultation following consideration of the public consultation report in September, and subsequently the Gateway 5 report in December 2021. If all of the experimental schemes both City and TfL promoted were to remain as they currently operate, then this would be based on the monitoring of those schemes and the subsequent consideration of Section 122 of the Road Traffic Regulation Act in each of their cases. Delaying the progression of the All Change at Bank Project to wait and see what the other schemes decide to do, which are yet to prove their impacts and their benefits, would be detrimental to the wider public benefit of implementing the designed changes at Bank which greatly assist the largest mode of travel, people walking. On this basis as outlined in paragraphs 31 -42 it is not recommended to uphold this objection.
78. Objection 3 regarding our Public Sector Equalities Duty and impact of the proposals on disabled people. Due regard has been given to all aspects during the design process and impacts have been mitigated as far as possible. This process has been referenced throughout the decision-making process. It is also important to note the benefits that are achieved which enhance the environment for those people with protected characteristics by these changes. It is acknowledged that there remain issues which cannot be addressed or further mitigated by the proposals at Bank, but here has been significant work undertaken in this area to finely balance requirements and advance equality of opportunity at Bank. On this basis as outlined in paragraphs 42-50 it is not recommended to uphold this objection.
79. Objection 4 focuses on allowing taxi access across the junction at all times. As already covered in the previous reports, there had been ongoing consideration to this objection and more recently the review of traffic mix and timing has been expedited at the request of the Court of Common Council. This area of concern is well documented but relates to the arms open to motor vehicles in the design. Delaying the progression of the physical changes by not approving the making of the proposed traffic orders in order to await the findings of the review would cause delay for all of the benefits to be realised, including the change of traffic mix. Any subsequent proposed change from the review to traffic mix or timing relies on the substantive physical changes being in place. On this basis as outlined in paragraphs 51-57 it is not recommended to uphold this objection.

80. Objection 5 relates to the way that taxi driver and passengers' views were dealt with in the public consultation findings report in September 2021. It does not directly relate to the content of the traffic orders advertised. The view of drivers and their passengers were largely unanimous, and these were clearly captured and reported on within the consultation findings report. Views were not dismissed or ignored within the report and the analysis of the consultation report was discussed and debated at Committee. The key comments from this group discussed in detail in the September report which subsequently led to the approval to proceed to statutory consultation on the traffic orders were regarding taxi access, taxi access to support access for disabled people, journey time/congestion/navigation, and the timing of the project (impact of COVID). All of these substantive points have been raised as objections to this statutory consultation and further commentary provided.
81. Objection 6 relates to the influence of the pandemic and whether the proposal at Bank is still needed. We accept that there is uncertainty around future work patterns and how hybrid working might evolve. The All Change at Bank scheme not only provides for improvements to and expansion of the local public transport network, with associated increases in people largely walking and cycling the last part of their journey, but also provides relief from years of growth in the area which has not yet been accommodated by changes to the layout at Bank. Aspirations for improved public spaces and improved experiences by businesses and their workers and visitors indicates that these changes are still needed. On this basis as outlined in paragraphs 67-70 it is not recommended to uphold this objection.
82. Objection 7 relates to a lack of data in the statement of reasons and also the focus given to people walking. Whilst the reasons set out in the statement is relatively brief, more detailed information has been made available as the design has progressed, including at the public consultation exercise. The focus on people walking is legitimate given the volume of people walking through the area and its position above the busy underground station. On this basis as outlined in paragraphs 71-75 it is not recommended to uphold this objection.

## **Corporate & Strategic Implications**

83. Gateway 5 report in December 2021, linked in the background documents covered these areas in full.

### **Financial implications**

84. There are no further financial implications of this report beyond those discussed in the Gateway 5 report in December 2021, save to note that if a public inquiry was to be held, it would have financial implications which could impact on the budget available to deliver the changes.

### **Resource implications**

85. No further implication of this report – discussed in the Gateway 5 in December 2021

## Legal implications

86. Under regulation 9 of the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (“the 1996 Regulations”), the Highway Authority may cause a public inquiry into objections to be held before making these orders or could be obliged to hold a public inquiry if certain criteria are met.
87. Following consideration of the regulations, it is recommended that the City Corporation, as traffic authority should proceed to the making of the orders incorporating a minor modification on Mansion House Place order by reducing the length of the ‘At any time’ loading restriction to 15m (advertised as 15.6m). Officers do not consider that holding a public inquiry would be in the public’s interest for reasons explained above.
88. The project, which the traffic orders relate to, is controversial for some people, but with a relatively small number of objectors, largely objecting to the same principles as were raised in the public consultation in the spring of 2021, the time and expense of public inquiry outweighs the likely public benefit of proceeding to Inquiry. Officers consider that the concerns of the objectors are well understood and have been considered in full.
89. Regulation 13 of the 1996 Regulations requires the order making authority to consider objections before making an order. Consideration of these objections are detailed in this report.
90. Section 122 of the Road Traffic Regulation Act 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;** This is an area that has been explored during the design and regarding the objections. It is mainly considered in the responses to objections 3 and 4. This explores the arguments of access to premises for disabled taxi users as well as more generally motor vehicle access route choices to other locations and how this is balanced.

**(b) the effect of amenities of any locality;** The proposals would provide greater amenity and is explored in objections 3 and 6 of this report. The design rebalances the carriageway space with enhanced space for people walking and cycling as well as improving the amenity for people with protected characteristics who use, or may in the future use, the area. The proposals would encourage greater use of walking and cycling through the area linking with the City’s Transport Strategy and Air Quality Strategy.

**(bb) national air quality strategy;** The national air quality strategy sets out air quality objectives and policy options to further improve air quality in the UK. The intention is to provide benefits to quality of life and help protect the environment. The City of London Air Quality Strategy (2019-2024) is also relevant and provides a commitment that the City Corporation will implement a range of measures to reduce emissions of air pollutant associated with road traffic in the Square Mile; Reducing the number of arms for motor vehicle use at Bank will improve corridors for people walking and cycling without being

immediately next to running motor traffic with emissions; increased distance away from emissions reduces the impact

(c) **public service vehicles;** The impact on public service vehicles has been considered in the design and the consultation including impacts on their passengers. The impact to public service vehicles is part of the scheme Traffic Management Approval (TMAN) . It is not considered that there would be any undue impacts on public service vehicles. It is considered that any impacts of the scheme on public service vehicles will be outweighed by the benefits of the scheme;

(d) **any other relevant matters.** The City of London Transport Strategy (May 2019) is relevant to this decision. In Appendix 4 there is a table which sets out how the project delivers the transport Strategy Aims, the Corporate Plan 2018, Climate Action Strategy 2020 and the Air quality strategy 2019. Other relevant matters have been set out in this report.

91. The main evaluation of the scheme at Gateway 5 (available in the background papers) covers these elements in more specific detail, however the evaluation in this report has balanced the various relevant considerations above regarding the objections received. This includes the issues raised around the desire for routes through the area proposed to be restricted. It has also considered the impacts and benefits of the proposals against the objections received in order to reach the recommendation to proceed to the making of the Orders.
92. Further legal advice is provided as an exempt appendix which is not for publication as it contains information in respect of which a claim to legal professional privilege could be maintained in legal proceedings, and the public interest lies in maintaining the exemption.

#### Risk implications

93. As with any decision of a local authority, there is a risk of legal challenge regarding the decision to proceed to the making of the Traffic Orders and delivering the scheme proposals. If this risk were realised, and an application for judicial review was successful it could lead to the quashing of the decision and the orders made. This would have significant impacts for the build programme and cost of the project.
94. There are no further Risk implications of this report beyond those risks previously discussed in the Gateway 5 in December 2021 (available in the background papers).

#### Equalities implications

95. When making decisions, the City Corporation must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). As such this duty requires City Corporation to consider how the decision will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the orders and any potential disadvantages suffered by people because of their protected characteristics. The

protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

96. Equality implications have been considered at various decision points in progressing this project and are considered and set out in this report. It is noted that an Equalities Assessment was published with the gateway 4 report and an update was provided at appendix 8 of the gateway 4C report in February 2021 which outlined the progress made in mitigating the issues raised in the earlier Equalities Assessment. This is attached at Appendix 3 again for consideration.

Climate implications

97. No implications from this report.

Security implications

98. No implications from this report.

## **Conclusion**

99. The objections received in response to the statutory consultation did not raise any new matters of concern, which had not already been considered prior to deciding to go to statutory consultation. Officers do not consider that any of the objections are significant enough to be upheld and prevent the traffic orders, progressing as advertised other than in respect of the loading on Mansion House Place, Officers are recommending that the Mansion House Place loading order be modified to have a maximum length of 15m and that the other orders should be made as advertised.

## **Appendices**

Appendix 1 – Objections to the Traffic Orders  
Appendix 2 – Comments to the Traffic Orders  
Appendix 3 - Equalities Assessment Analysis  
Appendix 4 –Strategy links  
Appendix 5 –**Not for publication**

## **Background Papers**

Gateway 5: Authority to start work (December 2021)  
<https://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=122207>

Consultation findings report (September 2021)  
<https://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=116626>

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## Appendix 1 – Objections to the Traffic Orders

Bank Junction

Consultation 10 November – 3 December 2021

<b>Date:</b> 2/12/2021	<b>Name:</b> Objector A	<b>Address:</b>
<b>Comments:</b> This is a ridiculous waste of money. This will not improve air quality because the city as a whole will be gridlocked-this will have a knock on effect on emergency services who are already struggling to get around in the square mile because of the gridlock you have created by duplicitously using covid as a cover to rush through schemes like this without proper consultation. You cannot force people onto buses or to cycle if they don't want to. The disabled need access to these areas and deserve to be able to rely on a door to door service from taxis, who are scandalously excluded from all of these schemes. You are really only improving things for cyclists, and potentially TFL because their vast numbers of empty buses will have free travel through these areas. If you actually asked normal people what they thought of these schemes rather than inadequately advertised and complicated consultations I doubt very much you would find any support for them		

<b>Date:</b> 2/12/2021	<b>Name:</b> Objector B	<b>Address:</b>
<b>Comments:</b> Just open it all up fully to traffic Stop messing around by opening one road west bound to pigeons. Get London moving again!!		
<b>Responses:</b> Thank you for your comment to the recently advertised traffic orders at Bank ( <a href="https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation">https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation</a> ). We are not treating this as a formal objection to the traffic order being advertised.  Instead, this is being treated as a general comment. If you do not agree with the way that your response is being considered, then please respond to this email by stating the grounds that you are objecting on. This needs to be <b>received by Friday 4 February 2022</b> in order to be considered alongside the other objections in the statutory consultation decision report. This will be circulated to Members on the 7 February.  Further information on the project can be found on our website: <a href="http://www.cityoflondon.gov.uk/allchangeatbank">www.cityoflondon.gov.uk/allchangeatbank</a>		

**Folllow up comment: received 28/01/22**

This is a formal objection!!

Black taxis should have full access to the Bank junction and ever other junction in London as we often carry the physically and mentally ill people around as we have full wheelchair access!!

**Response:**

Thank you for the additional information to clarify that you are objecting and confirming the grounds for consideration.

This information will be included in the report, which is to be circulated for a decision on whether to proceed with the making of the traffic orders.

We will circulate further information in due course regarding the report and the subsequent decision.

<b>Date:</b> 2/12/2021	<b>Name:</b> Objector C	<b>Address:</b>
<b>Comments:</b> how you can ban traffic to flow through bank junction is an absolutely ridiculous idea & will only cause more traffic & polution in the surrounding area....you should at least allow licensed taxis to pass through bank junction .this is also a bad idea for disabled persons & for people with medical problems...really not thought out properly at all		

<b>Date:</b> 2/12/2021	<b>Name:</b> Objector D	<b>Address:</b>
<b>Comments:</b> Simple request. Either scrap the whole scheme or allow taxis full access		
<b>Responses:</b> Thank you for your comment to the recently advertised traffic orders at Bank ( <a href="https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation">https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation</a> ). We are not treating this as a formal objection to the traffic order being advertised.  Instead, this is being treated as a general comment. If you do not agree with the way that your response is being considered, then please respond to this email by stating the grounds that you are objecting on. This needs to be <b>received by Friday 4 February 2022</b> in order to be considered alongside the other objections in the statutory consultation decision report. This will be circulated to Members on the 7 February.  Relating to your comment; Included in the Committee approvals to proceed to Statutory Consultation on the traffic orders for Bank was a commitment to review the traffic mix and timings of the restrictions on the Poultry, King William/Lombard Street and Cornhill arms of the junction (if the project proceeds). This review will be undertaken at a time when the post pandemic traffic situation has regulated. This		

will ensure that we better understand what the right balance for the mix of traffic and time of the restrictions is. If the outcome of the review was to permit more types of vehicles for example, then the layout of the junction as proposed would not need to change and can be progressed by amending the traffic orders and signage.

Further information on the project can be found on our website: [www.cityoflondon.gov.uk/allchangeatbank](http://www.cityoflondon.gov.uk/allchangeatbank)

**Follow up comment: received 28/01/22**

It is a formal objection to taxis being excluded

<b>Date:</b> 1/12/2021	<b>Name:</b> Chairperson	<b>Address:</b> United Cabbies Group
<b>Comments:</b> See 4 page representation at the end.		

<b>Date:</b> 3/12/2021	<b>Name:</b>	<b>Address:</b> Motorcycle Action Group London
<b>Comments:</b> See 12 page representation at the end.		

<b>Date:</b> 3/12/2021	<b>Name:</b> Chairman	<b>Address:</b> LTDA
<b>Comments:</b> I write on behalf of the Licensed Taxi Drivers Association (LTDA) regarding your consultation ref TraffOrder/DBE/CT-GL. The LTDA is the professional and authoritative voice of London's licensed taxi drivers, representing over half London's black cab drivers. Throughout the Coronavirus crisis, London's black cab trade has worked hard to provide safe, socially distanced transport for key workers, served as a lifeline for disabled and vulnerable passengers unable to use public transport. Black cabs are the lifeblood of London and have a key role to play in our city's economic recovery by getting the capital moving again as safely as possible. The LTDA recognises the important objectives behind this scheme, particularly around addressing air pollution and pedestrian safety. Our small contribution to pollution is something we too are working hard to combat, with more than a third of London's taxi fleet now zero emission capable and growing. London's black cabs are the only fully wheelchair accessible form of public transport and are also equipped with devices such as hearing loops. Licensed taxis are also legally obliged to undertake any compellable journey with fares set and closely regulated by Transport for London. We are constantly independently recognised as the safest form of travel in London causing fewer accidents than any other form of travel besides walking. We want to work with you to ensure that the scheme can continue to meet its objectives without undermining the vital and unique service London's licensed taxis provide. Our response to this consultation should be considered along with our previous consultation response regarding this scheme as despite a majority in favour of allowing taxi access to Bank in that consultation, there has been no movement in your original objectives. So all points raised by us previously remain valid.		

With the exception of the raised table carriageways to enable safer pedestrian movements we oppose these proposals because combined with the other changes in and around Bank set out in this consultation's notes, it would make the area extremely difficult to navigate for licensed taxis and our passengers. Continuing to close these sections of Bank junction to London taxis will make it difficult for taxis to service locations in and around this area of the city, such as The Ned, Threadneedle Hotel, Marco Pierre White restaurant and bar, Tower 42 and the many other establishments we are compelled to take our passengers. There are few alternative routes open to taxis needing to reach destinations such as those previously mentioned as well as the mainline railway station of Liverpool Street.

Current restrictions on A10 Bishopsgate and Gracechurch Street and Old Broad Street would also further exacerbate this and we believe it is reckless of the Corporation to consider making these changes at this time. The Corporation must take these schemes into account when making a final decision on the All Change at Bank proposals and must fully consider their cumulative impact on the ability of vehicles to move around the area. Otherwise, there is a real risk that the City could become impassable for licensed taxis and certain areas could become inaccessible and rather than a 'destination point' as intended it will instead become an unattractive no go zone for Londoners and visitors.

If, however, taxis were given the same access as buses to King William / Lombard Street, Cornhill and Poultry, this would open up the required alternative routes, which would make the proposed changes more viable. Likewise with Princes Street taxis should be given the same access as buses

and cycles to ensure there is a viable North-South route (in both directions) through Bank and the City available to licensed taxis. This is crucial to enable taxis to continue to provide an important door-to-door, accessible service for those who rely on it and to get passengers efficiently to their destinations. Not permitting licensed taxi access would mean that they are forced to take long diversions, which would make fares more expensive and journeys significantly longer. This is not only damaging for the taxi trade – making taxis less competitive and appealing to passengers – but would also put passengers for whom taxis are the only means of travel, including protected groups such as elderly and disabled people, at an unfair disadvantage and we believe would contravene the Public Sector Equality Duty, as set out in the 2010 Equality Act.

We strongly oppose retaining the existing restrictions in their current form. As we have long argued, licensed taxis should be given the same access as buses and cycles during the restricted hours to the other arms of the junction, as permitted vehicles. This is important to ensure that there are viable East - West and North - South routes in both directions through Bank and the City, available to licensed taxis and enabling them to continue to provide the door-to-door, accessible service many of our passengers rely on and to get passengers efficiently to their destinations. By including licensed taxis as permitted vehicles, the Corporation could still achieve the wider objectives of the All Change at Bank Scheme, whilst ensuring that the City remains accessible, and no one is unduly disadvantaged by the scheme.

As previously stated, we fully support the objectives of the All Change at Bank project, specifically making the area safer for pedestrians and creating an attractive, welcoming environment and improving air quality. We believe that all of these objectives can be achieved whilst granting licensed taxis access to the arms of the junction as a vital part of London's public transport mix. Taxis are the lifeblood of the City of London and a vital means of transportation for the business community, people with limited mobility, tourists and many others. It is our belief that the benefits which the current measures at Bank Junction have secured, such as improvements to the safety of the junction and shorter journey times for buses, could be maintained whilst permitting taxis to use Cornhill, King William/Lombard Street and Poultry and thereby fully serve the City of London's community. We also believe that Princes Street Northbound should be open to licensed taxis. The All Change at Bank proposals offer the opportunity to achieve this. By granting taxis the same access as buses as part of the proposed changes, the Corporation could give taxis much-needed North-South and East-West routes through the City, improving accessibility of the area and ensuring that travelling by taxis is a practical, efficient, and cost-effective option for passengers needing to reach destinations within and around it.

Without this change, we are also extremely concerned about the cumulative impact of the proposed measures, when combined with other road closures and traffic measures already in place around the City, including the bus gates and banned turns on the A10 Bishopsgate Corridor and current restrictions should they remain in place. The A10 for example was a key route used to avoid Bank Junction and closing this important bypass has made it even more difficult for drivers to find a viable North-South route through the City. This is making journeys from areas like London Bridge to Shoreditch High Street extremely difficult to make and is resulting in increased journey times and fares for passengers.

Through All Change at Bank, the Corporation is looking to create a safe and welcoming environment for pedestrians and encourage active travel. You are also looking to reduce emissions and improve

air quality within the City. Including licensed taxis in the proposals would support all of these objectives as outlined in more detail below.

**Reducing traffic, Environmental benefits, Safety, Accessibility & Supporting local businesses**

The situation has changed considerably since restrictions were first introduced at Bank Junction. When the proposals were first implemented, in April 2017, the LTDA appointed transport specialists BWB Consulting to evaluate the City of London Corporation's rationale for excluding taxis from the junction, as well as measuring its impact on the taxi trade and wider traffic conditions. Our modelling found that the Corporation had significantly overestimated the number of taxis passing through the Junction, using an out-of-date assessment for its modelling, thus overstating the impact that the inclusion of taxis within the then trial would have had.

City of London data concluded there were a total of 5,897 licensed taxi movements through Bank Junction, however this was based on data from 2014. Data collected by BWB in April/May 2017 prior to the commencement of the trial showed that the number of journeys had in fact dropped by 28.9% and stood at 4,192 licensed taxi movements. Since 2017, the size of the taxi fleet has reduced considerably. TfL data shows that in 2017/18 there were 21,026 licensed taxis in London. There are now just 13,544 licensed taxis (according to TfL data) a reduction of 36% with the number of licensed vehicles having fallen sharply due to the pandemic.

Age limit losses combined with lack of available funds and limited production availability of new taxis means we are on course to see the fleet reduce further to around 13,000 vehicles and possibly to a total of around just 12,000 vehicles by September/October 2022 with little likelihood of even a small recovery to today's already low figure before 2024.

This significant reduction in the size of the fleet will mean that taxi movements are further reduced and that including licensed taxis would not add to traffic volumes or likely impact bus journey times. Recent TfL data has shown that there has been a 42% reduction in taxis within the congestion charge zone, this is an area that is known within the trade as the golden or magic circle and were the vast majority of taxis will head for work. The 42% reduction found within the Congestion charge zone will be at least equal, or more probable, higher within the City of London.

**We do not believe that officers were aware of these low numbers and so their recommendation to delaying the decision to include taxis into the traffic mix was based on insufficient data. We also believe that rather than a delay 'due to the unknown' now is the perfect time to permit taxi access and gauge any possible drawbacks of our inclusion as our fleet numbers slowly increase.**

As the Corporation is aware, the London licensed taxi trade is working hard to transition to an all zero-emission capable fleet, in the first half of this decade, in an effort to reduce emissions and help clean up London's air.

To date, the trade has invested more than £29 million in ZEC taxis and prior to the pandemic was continuing to invest at a rate of £3 million per week. As a result, there are now 4,300 ZEC taxis in London which equates to over 30% of the fleet and with only ZEC taxis available to purchase that number will only ever increase.

The All Change at Bank proposals are also designed to make the area safer for pedestrians and cyclists, to encourage active travel and to better manage the huge flows of pedestrians exiting Bank Station. We fully support these objectives and recognise their importance, however including taxis as permitted vehicles on these routes, would not undermine them.

London's licensed taxis, driven by highly trained drivers, provide a safe and reliable service for passengers and other road users and are generally unlikely to be involved in serious or fatal accidents. This is borne out by existing accident data. The LTDA is for example not aware of any collisions involving a licensed taxi at Bank Junction, and none of the notes taken by the Metropolitan Police record the involvement of a licensed taxi either.

In an attempt to maintain taxi availability in and around Bank, in response to the current restrictions, the City of London established new taxi ranks, however, as vehicles must turn away from (rather than enter) the junction, these have caused a sharp rise in potentially hazardous, necessary u-turning manoeuvres on approach to the junction. Permitting taxi access would remove the need for such hazardous manoeuvres and as shown by the figures above would have minimal impact on public safety.

Taxis are the only form of truly door-to-door, accessible public transport in London and are relied on by many people as their only means of transport, reflected in the provision of the Taxicard scheme. In the context of the pandemic, purpose built hackney carriages also offer a preferred means of travel for many people, particularly those who might be more vulnerable to Covid-19, with the fixed partition, easy to clean interior, contactless payment facilities and limited contact between driver and passenger.

Measures which limit taxi access and therefore impact the availability of taxis in an area and increase journey times and fares have a knock-on effect on accessibility of the area and place our passengers, including those with protected characteristics, such as elderly or disabled people, at a significant disadvantage.

The current restrictions in place at Bank are reducing the availability of taxis to transport users (including vulnerable users), as there are fewer taxis present in the City and it is much more difficult to hail one or find one through an app for immediate hire. LTDA research in 2017/18 found that the number of licensed taxis approaching the junction had severely decreased (estimated at -22%) as a result of the restrictions. This figure will have been exacerbated by the sharp decline in taxi drivers and vehicles since the pandemic as mentioned above.

The restrictions have also negatively impacted journey times and leading to increased fares. ANPR data from 2017 shows that journey times for taxis travelling through the wider Bank area have increased by 21% on average. This implies that the measures have contributed to an increase in congestion in the wider area, presenting significant air quality and road safety issues, in addition to making travelling in the City of London less convenient. GPS surveys conducted by the LTDA, and accepted by your officers at the time, indicate that licensed taxi journey times (and therefore the journey times of other surrounding traffic) have increased by an average of 5 minutes 32 seconds (+53.9%) to points on opposing sides of the junction. This also results in increase fares as driver are forced to take longer alternative routes and then encounter additional congestion on those routes.

Licensed taxis are an important means of transport relied on by many who work in and visit the City of London. Taxi service many of the hotels and hospitality venues, providing a convenient means of transportation for their patrons. There are a number of hotels and hospitality venues such as the Ned and Threadneedles Hotel, that are already being negatively impacted by the existing restrictions and would be further damaged by the wider changes proposed as part of All Change at Bank, as they would become even harder to reach and less convenient locations for people to stay and visit, deterring their customers and the service they provide. Business travellers and tourists in particular rely on taxis to get around and cycling and walking are not viable alternatives for them, as they may be travelling with luggage or small children for example.

These venues are already struggling as a result of the pandemic having been forced to close for long periods over the last year and having seen customer numbers significantly reduced at other times. Without changing the vehicle mix and permitting taxi access to these roads, All Change at Bank stands to do them further harm.

Regards

**Paul Brennan**

**Chairman**

**Licensed Taxi Drivers Association**



**Web: [www.ltda.co.uk](http://www.ltda.co.uk)**





We submit an objection on the following grounds:

The Gunning Principles in our view come in to play here as outlined in the Local Government Association guide to engagement whereby consultation is only legitimate when key principles are met:

1. proposals are still at a formative stage and a final decision has not yet been made, or predetermined, by the decision makers
2. there is sufficient information to give 'intelligent consideration' The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
3. there is adequate time for consideration and response There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,<sup>1</sup> despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
4. 'conscientious consideration' must be given to the consultation responses before a decision is made Decision-makers should be able to provide evidence that they took consultation responses into account

In our view it is debatable if the conscientious consideration threshold is met and if the decision was pre-determined prior to consultation as this scheme is interdependent upon TFL's plans for Bishopsgate which remain a matter of legal challenge and are now likely to be settled in the Supreme Court.

By your own admission you refer to the following points in the public copy of the A Gateway 1 and Gateway 2 Project Proposal:

*From a traffic management perspective, we are not in a position to be able to adequately assess the option for changing the traffic mix at this time. Likewise, without understanding what future travel patterns at the weekend and later in the evening following the pandemic, it is not recommended to consider further changes to the timing of the restrictions at this time.*

We object to there being a permanent order being put in place without adequate assessment of the traffic mix and further consideration to TFL's proposals for Bishopsgate. We have been here before, and this appears again the issue of taxi access being avoided again. The original Bank of Safety scheme had questionable data and you have perpetuated a false narrative that Taxis/Black Cabs are unsafe and were shown in previous modelling as a disproportionate mode travelling through the junction. Road collision data captured by TFL clearly shows buses and cycles cause more accidents around the junction. A review of taxi access was supposed to have been undertaken prior to Covid.

In fact, had taxi access originally been permitted in 2017 on the basis that Taxis/Black Cabs are permitted road access on their publicly hire status the same as a bus then the issue of access to Bishopsgate would have been different as you had already shut the only north/south route.

The data modelling LTDA carried out at that time showed this to be the case and permitting taxi access would not have slowed down the frequency of buses which in any case are now due to have their frequency reduced across London in light of TFL's financial challenges.

You refer to TfL intending to progress an experimental scheme that retains the timed restriction currently operational on Bishopsgate. It is safe to assume that there is an intention for Bishopsgate to be permanently changed, in some form, in the future, subject to the outcome of the experiment and consultation. This raises the question as to why the decision has been made to proceed.

We also raise objection to how you have referenced the responses from Taxi Drivers and Taxi Passengers; most of which remain aggrieved and did not feel appropriately consulted in 2017. This followed the severe restrictions you added in the Covid-19 City Streets plan despite the footfall in the city remaining non-existent for a large part of the year and even now many offices are only supporting a mix of home based and office working. The disruption to drivers and more importantly passengers is why such high numbers responded. LCC responded on behalf of 11,000 paid members but as they supported your aims their views have not been discounted.

We can only speak on behalf of our members and passengers who contact us. Yes, they use many modes within the city, some use a bus, some cycle and some walk as well as using a taxi to travel. Our demand is passenger lead – we are compelled to take our passengers via the shortest route by way of a meter regulated by TFL. They also cannot understand the rationale or justification for a publicly hired taxi not being able to cross the junction, so we actually expected their response rates to be higher as these are the people most disproportionately impacted.

Whilst we acknowledge you say *“a disproportionate number of responses have been received from users of some modes of transport, while others are underrepresented. This has to be taken into consideration to ensure a balanced view across the different users of the area.”* However, the narrative is at pains to discount the views of this group and is not adequately justified.

In reference to the following comments:

*Taxi access to support access for disabled people in (177) There is greater travel choice available for disabled people, or those less mobile, than there once was. Whilst the link with licensed London taxis and their accessible door to door service is not in question, there are other choices that some of those passengers might need or prefer to use. For example, private hire vehicles, also serve passengers with the London taxi card and are used by disabled people and people with limited mobility. Not all wheelchairs can fit in a licensed London taxi. Other services, such as Uber Access, offer a rear ramp vehicle which can cater for larger wheelchairs.*

We have sought to educate you since 2017 on the legislative and regulatory differences when access to Bank first became an issue, one we consider restraint of trade on a publicly hired form of public transport that is also a City Livered profession.

The Knowledge of London is our apprenticeship, and we remain to this day the only mode actually trained to safely navigate the junction prior to driving a Taxi/Black Cab. Bus drivers do not have such training. First taxis and private hire are not comparable. Taxis are publicly hired vehicles and 100% wheelchair accessible; a Taxi can only ever be a taxi and a PHV is just another private motor car; that is the reality and why Black Cabs have access to bus lanes and are exempt from the Congestion Charge. Only 1% of PHV are wheelchair accessible and only those vehicles are exempt from the Congestion Charge with a pre booked journey.

We have no issue with the small number of wheelchair accessible PHV vehicles having access along with blue badge holders. TFL have already granted one exemption for a blue badge vehicle for Bishopsgate.

Being hailed by the public like a bus is hailed to stop at a bus stop is our business model. 80% of our work is responding to street hails as we drive a world recognised vehicle with a For Hire light, so passengers see us and hail us to take them to a destination. This has been our USP and one that has served Londoner's well for in excess of 350 years as laid down by an Act of Parliament in force since 1869.

A passenger can only pre book a private hire vehicle and it should be in advance of when the vehicle is needed. A PHV cannot immediately be hired and can be picked up in a side street so the same access to Bank Junction to pick up or drop off is not required. We are trained to pick up and drive away safely without recourse to holding traffic up to input a destination into a device.

The diversion licensed taxis (hackney carriages) are required to take as a result of the existing restrictions to Bank Junction and the Covid-19 restrictions equates to a journey which increases the journey time and cost substantially and for those passengers who do not have access to a car but use licensed taxis as their mode of transport are being treated less favourably as we are compelled to take passengers via the shortest route because we charge via a regulated meter or which fees are set by TFL.

Not all disabilities are visible or involve a wheelchair and as shared with you in the last Taxi stakeholder call, we asked for an onsite visit based on lived experience of how challenging it is for passengers. We do not disagree with Transport for All's view and we also cannot understand why the city cannot be fully accessible for all users. The pavements and curbs are not fit for purpose when trying to safely load or unload a wheelchair user at a safe gradient for our wheelchair ramp. Likewise, it is not acceptable for a visually impaired passenger to be dropped before the restriction and just explain they need to walk the remainder of their journey.

In respect of the issue about fleet size, I enclose further detail which should have been taken into consideration, and we have provided August 2021 data to coincide with the data you had available at the time of your September report:

#### Age Limit/Fleet size

Taxis are exempt from the Congestion Charge and ULEZ when it was introduced in October. This is because we are publicly hired vehicles which are 100% wheelchair accessible, the same as buses and the only 2 vehicles this applies to in London. Our emissions are strictly controlled by TFL licensing requirements not the ULEZ because our vehicles are purpose built and the conditions of fitness set by TFL mean they need to meet a wide range of technical standards, making them harder to replace than ordinary vehicles eg cars.

The captures from ANPR within the Congestion Charge zone when a Taxi crosses the Congestion Charge Boundary is counted and this will include the same vehicle crossing more than once which is common throughout a working day. Naturally not all Taxis will be using Bank Junction at the same time. Please see the table below:

Taxis			ZEC Taxis		
Month	Daily Average Taxis Detected in CC Zone During Charging Hours	Monthly Total Taxis Detected in CC Zone During Charging Hours at Least Once (Unique)	Month	Daily Average ZEC Taxis Detected in CC Zone During Charging Hours	Monthly Total ZEC Taxis Detected in CC Zone During Charging Hours at Least Once (Unique)
Feb 2021	2,935	7,961	Feb 2021	1,089	2,721
Mar 2021	3,486	8,642	Mar 2021	1,311	2,976
Apr 2021	4,537	10,522	Apr 2021	1,627	3,448
May 2021	5,376	11,328	May 2021	1,836	3,561

We are 100% exempt from the Congestion Charge and ULEZ as we have our own Age Limit/Air Quality plan, which is based on the fact, we are mandated by TFL our regulator to drive a Taxi that has certain conditions of fitness, e.g., 100% wheelchair accessible, turning circle, identifiable as a London Taxi/Black Cab by the travelling public.

Prior to 1 January 2018 we could only drive 2 vehicles mandated as Taxis by TFL and both were diesel. From 2018 we can only purchase a zero-emission capable vehicle and based on 1 August 2021 figures; we are over 50% of the cleanest fuels including EU6 with these figures to rise as the trade continues to transition to ZEC. By comparison Dial-A-Ride buses which are currently exempt are a fleet of diesel only vehicles. Below are TFL figures for the total number of Taxis (i.e., Black Cabs) as of 1 August 2021.

<b>Model</b>	<b>Taxis</b>	<b>%</b>	<b>Notes</b>
Dynamo Taxi	102	0.73%	Zero Emission Capable
Metrocab	1	0.01%	
TX1	6	0.04%	
TX2	326	2.33%	These vehicles will reach their age limit by 31 October 2021
TX4	6979	49.89%	2900 of these are Euro 6 and approx 1000 will reach their age limit and come off the road by 31 October 2021
TXe	4034	28.83%	Zero Emission Capable
Vito	2542	18.17%	1350 have stop/start engines to reduce emissions when idling
<b>Total</b>	<b>13990</b>	<b>100.00%</b>	This number of Taxis has to cover demand in 32 London Boroughs 24/7, 365 days a year

The fleet composition is a very different proposition in 2021 and goes someway to dispel the myth we reduce air quality along with the rather false comments on safety.

Karen Proctor  
**Chairperson**  
 United Cabbies Group

## **Ref TraffOrder/DBE/CT/GL All Change at Bank - Motorcycle Action Group London Response**

3rd December, 2021

Dear Sirs / Madam

Motorcycle Action Group London ("MAG London") broadly objects to the suite of development plans for Bank Junction under the above reference.

The plans serve a limited, non-egalitarian perspective, with a narrow focus on issues which do not consider the full suite of challenges and transport needs of the City and its commuters, workers, businesses and visitors of all types at this time and the measures already in place.

Absolutely no reference to or provision is made for users of Powered Two Wheelers ("PTW"), despite their broadly acknowledged role as a constructive and productive solution to London transport issues by TFL among others. As clear evidence of this, TFL allows motorcycles and scooters to access all red route bus lanes across the capital and provides a permanent exemption from the Congestion Charge.

Further information regarding MAG and the wider benefits of PTW's to transport in London and the UK are listed in Appendix 1, a copy of the submission made by MAG to Parliament in June 2020.

Our stated objectives for City transport planning are listed at the bottom of this document.

To comment more specifically on the proposed scheme of work - this seems to come at the cost of significant further mobility restrictions to non-pedestrian traffic including users of Powered Two Wheelers ("PTW"), without seeming fundamentally necessary given very significant existing restrictions and re-design work that has occurred around Bank Junction in recent years.

At the present time and the foreseeable future, the impact of the Coronavirus pandemic continues to have a significant impact on travel and work patterns in and around the City and this does not seem to have been factored into the scheme either.

Further below, we question each of the stated motivations in the Statement of Reasons for the scheme. When assessed in detail, it is not clear that these fully justify the proposed scheme when weighed against wider implications.

The proposed changes will meaningfully increase the complication, cost, time and challenge of travelling in and out of the City via a major central junction for a range of important road user groups including PTW riders at a very difficult time, when the broader London and national administration is seeking a recovery and to get people back to the office.

The long-running evolution of the coronavirus pandemic continues to limit the attractiveness of densely packed public transport for a significant number of people and there seems a significant risk that it will do so for a multi-year period of time. Based upon the given scheme, the only alternative transport options being presented by the City in and through this central transport node are walking or cycling.

We have no issue with cycling and walking and note that people tend to use a range of transport modes. But if we are being honest, walking and cycling alone do not provide an attractive or viable means of home to business access to all 500,000 plus (pre-pandemic) daily City commuters and visitors (of all types), every day, in all weathers. These modes clearly favour those living in closer proximity to the City in areas that generally have very high living costs, to the exclusion of those on

more modest incomes. This includes those who need to work in and support a wide range of City based businesses.

City footfall was reported to have risen to only approximately 1/3 of previous levels during September 2021, challenging businesses trying to operate within the City. However, this scheme could be argued to effectively polish the ivory tower, when there should be a priority and pragmatic focus on helping individuals and businesses with recovery.

As such, the timing and nature of the City's proposals seem counter-intuitive.

The plans also represent the effective step by step creeping pedestrianisation of what is the key junction within the City without a large scale, formal consent process involving the broader range of constituent users. The nature of the City with most of its daily human population being temporary and few understanding the governance and administration arrangements, make it easier than normal for the City planning team to implement changes without a wider debate or proportionate mandate.

We note that the pedestrianisation scheme proposed for Oxford Street, which had a more widely publicised and responded to consultation did not carry majority public support, particularly on the grounds that it limited road access and mobility.

The Statement of Reasons provided with All Change at Bank documents states that when considering whether to make a traffic order, the City Corporation is under duty pursuant to section 122 of the Road Traffic Regulation Act 1984 (as amended) to secure so far as practicable the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians).

This exercise does not appear to make a serious attempt to address that statement in a broader, balanced sense. The only group of road users referred to in the Statement of Reasons is pedestrians.

The Statement of Reasons justifies the scheme on the basis that it will "help i. improve the safety, ii. air quality and iii. pedestrian experience of the area around the Bank junction to reflect the historic and iconic surroundings with the appropriate sense of place".

No data is provided to back these statements or to explain the merits of the scheme relative to its trade offs. To address these three points:

i. Safety: no data has been provided to explain the extent of safety issues and incidents of accidents at Bank junction at the current time, with the current road scheme, how these have changed from the past and what the marginal impact of the proposed changes will be going forward on a cost / benefit basis. We can only assume that accidents occurring around bank junction have been significantly reduced in absolute terms in recent years given the various measures taken. No assessment is further made re different types of road user. The City's Department of the Built Environment chooses to not comment further.

ii. Air quality: the City is already in the centre of the expanded 24-7 ULEZ zone and Bank junction is closed to motor vehicles other than buses 7am-7pm Monday to Friday. Whilst creating further significant obstructions to road users, it is hard to see how this new scheme is in truth going to further materially and objectively improve air quality at Bank. No assessment is referenced or regarding non-road traffic contributors to air traffic quality.

Again, the fact that we are living through the pandemic, with central London footfall at only 1/3 of previous levels (media references September 2021) and doubts about whether historic levels will ever be achieved again, does not appear to be considered or referenced in any data or arguments in support of these measures.

iii. Pedestrian experience of Bank junction: pedestrians have already been well prioritised at Bank, including the current timed access arrangements for vehicular traffic and the pavement widening / road narrowing and simplification that has taken place in recent years.

Commuters want to be empowered with attractive, convenient and efficient transport options to move in and out of the City. This should be the greatest priority of the City's transport strategy.

The primary reason that the approximately 500,000 people commuted in and out of the City pre-pandemic was to travel to get to a place of work. As impressive as the buildings around Bank Junction are, the truth is that for the vast majority of people and time, they are simply a backdrop to a greater purpose - the commute.

A significant number of office workers now have an electronically enabled alternative work location and the City no longer holds a monopoly on work location. It seems in its long term strategic interests of the City to help people to make the journey. Further fine-tuning very local cosmetic aspects and effectively seeking to destroy alternative surface transport options is not going to achieve that at this time.

The effect of what the City is proposing is to take choice away and make the City welcoming only to those accepting the transport options being physically enforced via the scheme.

The proposed scheme creates further byzantine micro street controls that are not consistent with other parts of the wider the road scheme and will likely be difficult to follow. Already, it is hard to get around the City by road without a sat-nav to try to keep compliant with the various existing highly specific and complex road plan and regulations, and one needs to hope that the database it is running off is up to date. This in itself is not hugely consistent with enabling diverse public access to the City.

We are concerned that overall, the proposals will further increase the complexity and cost of moving through the City for PTW riders, commuters and service providers, at all hours (not just the control hours) and further limit travel possibilities and the desirability of the City as a business location.

We expect that the proposed arrangement will further vex many and contribute significant further penalty fine revenue to the City of London. Based upon media coverage of the past changes to Bank Junction, the City appears comfortable to take a relatively machiavellian approach to this issue, which we are not sure is consistent with what are otherwise projected to be its values. To provide one example of media reporting on the issue re the recent past development of Bank Junction (text provided in Appendix 2):

<https://www.citymatters.london/bank-junction-fines-reap-12-5million/>

If this piece is accurate and as per the stated FOI request, the City received 68,441 items of correspondence about the closure of Bank Junction between May 2017 and November 2018, this would most likely be the largest volume of public communication received regarding the existing works at Bank, significantly exceeding the limited consultation work undertaken by the City. We would probably not be taking a huge risk in assuming that the majority of this feedback was negative.

Appendix 1 provides a detailed overview of the nature and advantages of PTW transport on a national and local level as submitted by MAG to Parliament in June 2020. Some high level points include:

- Flexibility - PTW's provide an essential alternative when public transport is not available or attractive. Participants are necessarily socially distanced given their safety kit

- Travel possibilities - PTW's can be used for journeys that are not practical or attractive solely on foot or bicycle
- PTW's do not contribute to congestion
- Emissions and fuel consumption are significantly lower than common forms of road transport and continue to reduce given market and legislative factors
- Low cost - daily running can be less than the underground given the efficiency of smaller capacity machines, which make up the majority of City traffic
- A combination of these factors mean that through the pandemic, the use of PTW's to provide transport and effective logistical services and support delivery and other services in London has visibly increased

The market is also providing further solutions and we note that post the release of lockdown in England, sales of electric PTW's continue at record levels.

We would urge the City of London to reconsider the very narrow perspective put forward by the Department of the Built Environment in this road design scheme and follow the example of other local governmental and development agencies to embrace PTW's as one part of a range of attractive transport solutions, to develop a balanced and objective multi-modal transport strategy with the goal of empowering the growth and economic recovery of the City.

High level objectives of MAG would include:

- A balanced level of road access that supports efficient movement
- Simple, consistent and intuitive road layouts for all road users, with appropriate design and width for PTW's to safely move in a way that is clear and visible to others
- Improved volume and quantity of parking facilities with simple security features for chaining bikes to.

These are remarkably straightforward, low cost and again, egalitarian measures that are in no way mutually exclusive vs. cycling and walking, as has been proven elsewhere.

There are a range of widely held, poorly informed biases against PTW transport, however, in truth, the vast majority of bikes used to enter the City are low capacity, highly efficient and quiet. This is easily observed in the various PTW parking bays that remain in the City.

We very much hope to have a constructive dialogue with the City around the implementation of such improvements.

Yours

Motorcycle Action Group, London

Following - Appendices.

## **Appendix 1**

### **Written evidence submitted by The Motorcycle Action Group to Parliament - June 2020**

Pasted from the PDF file at this link: <https://committees.parliament.uk/writtenevidence/7362/pdf/>

#### **About MAG**

The Motorcycle Action Group (MAG) is the UK's leading riders' rights organisation. Formed in 1973, we are a membership organisation with over 58,000 full and affiliated members.

We represent the views and opinions of over 1 1/4 million regular motorcyclists in the UK.



We are responding to this inquiry to set out the role of powered two wheelers (PTWs) in meeting these aims, and to address some of the barriers that riders may face in getting back on the road.

### **Executive summary**

- For those who cannot reasonably cycle or walk, PTWs present the best alternative for socially distanced travel.
- PTWs do not contribute to congestion. In fact, it is estimated that if 10% of people switch from cars to PTWs, congestion would decrease by 40%.
- Increased use of PTWs would significantly improve air quality.
- The average PTW on the road emits around 30% less CO<sub>2</sub> than the average car on the road<sup>1</sup>. Electric motorcycles and mopeds produce no tailpipe emissions.
- We are statistically one of the most vulnerable road user groups, but our needs are often ignored in transport planning and road design.
- Allowing PTWs into bus lanes, or bus and cycle corridors, has been proved to have no measurable negative effect on other road users, but a positive effect on motorcycle and scooter riders.
- Despite the advantages that PTWs bring, they are being ignored in transport planning as we emerge from the pandemic and, in some cases, appear to be being deliberately pushed out of towns and cities. We are particularly concerned to see many roads being closed off to PTWs across the UK. In addition, no mention has been made of PTWs in the Department for Transport guidance Reallocating road space in response to COVID-19: statutory guidance for local authorities<sup>2</sup>.

### **What can be done to support PTWs?**

- Recognition in all Government messaging of the role that PTWs should play as a transport mode as we recover from the Coronavirus pandemic and beyond.
- Inclusion of this role in the Department for Transport guidance Reallocating road space in response to COVID-19: statutory guidance for local authorities<sup>3</sup>, and promotional and other materials.
- Inclusion of PTWs in all bus lanes nationwide, including the new bus and cycle only areas that have been created as part of the transport response to Covid-19. Evidence to support this is set out in the section on The role of PTWs during and after the Coronavirus pandemic below.

<sup>1</sup> MAG: Motorcycle Carbon Emissions

<sup>2</sup> DfT: Reallocating road space in response to COVID-19: statutory guidance for local authorities

<sup>3</sup> DfT: Reallocating road space in response to COVID-19: statutory guidance for local authorities

- Provision of fit-for-purpose secure parking facilities for PTWs. This can be provided in the guise of dual-use cycle and motorcycle facilities with no additional cost implications.
- Recognition of the vulnerability of PTWs and our needs in road layout and design, and in efforts to prevent road traffic deaths.

### **About powered two wheelers**

The term 'powered two wheelers' covers a variety of vehicles, including motorcycles, scooters and mopeds.

PTW engines vary in size. Across the UK in 2019, 35% of all PTWs registered for the first time were under 125cc, and 27% of all licenced PTWs were under 125cc<sup>4</sup>.

In addition, the use of electric-powered two wheelers is increasing as the technology becomes more viable. There has been a five-fold increase in new registrations of electric PTWs from 2015 to 2019<sup>5</sup>.

**The key advantages of PTWs are:**

- Congestion busting: PTWs don't contribute to congestion, due to their size and the fact that they can filter when other traffic is slow moving or stationary, meaning journey times are quicker and more consistent. For car drivers it means one less car on the road in front of them.
- Lower emissions: The use of PTWs has the potential to significantly reduce pollution, due to the relative efficiency of the vehicle compared with cars, and the fact that they do not contribute to congestion. Electric motorcycles and scooters (a growing part of the market) produce no tailpipe emissions.
- Longer distance travel: The fact that PTWs have an engine means they can be used for journeys that are too far to walk or cycle.
- Lower cost: A PTW can be considerably cheaper to run than an average car, and parking is often free, making it a more accessible transport option for those on low incomes.
- Flexibility: PTWs can be an essential alternative at times when public transport isn't available.
- Safety: Women riders (a fast-growing demographic) are at a lower risk of sexual harassment while travelling by motorcycle or scooter than by walking or using public transport.

Roughly 1.3 million PTWs are registered in the UK<sup>4</sup>.

Many more people could switch from public transport or cars to a PTW with appropriate incentives in place.

**The role of PTWs during and after the Coronavirus pandemic**

PTWs are the ideal transport mode to meet the Government's dual aims of socially-distanced travel and reduced congestion and pollution as we emerge from the Coronavirus pandemic. The nature of the vehicles and mandatory helmet wearing means that riders are naturally socially distanced.

<sup>4</sup> DfT: Vehicle

<sup>5</sup> Ibid

<sup>6</sup> DfT: Data on all licensed and registered vehicles

In addition, they do not contribute to congestion. In fact, it is estimated that if 10% of people switch from cars to PTWs congestion would decrease by 40%<sup>7</sup>. This figure could be improved even more if people ride pillion with members of their own household.

The relative efficiencies of PTWs, alongside the fact that they do not contribute to congestion, means that PTWs are significantly less polluting than cars. The average PTW on the road emits around 30% less CO<sub>2</sub> than the average car<sup>8</sup>. Electric motorcycles and scooters produce no tailpipe emissions. There is the potential for such vehicles to contribute significantly to reducing levels of air pollution in the future.

PTW's take up significantly less parking space than other vehicles, with up to six fitting in one car parking space.

PTW's are vulnerable to theft however, as are pedal cycles. The most effective solution for reducing theft is the ability to chain the vehicle to an immovable object. Cycle parking consisting of solid rails can fulfil this role if careful consideration is given to placement and access by PTWs. We

are therefore calling for dual use cycle and motorcycle parking provision; a policy requiring no additional funding, but providing a better return on investment of emergency funding made available to Local Authorities.

The idea that cycling and walking alone can replace all the transport needs of those who will be unable to commute by public transport is not realistic. The average cycle trip in 2018 was 3.3 miles. Nationally, average local bus trips are 5.3 miles. The average trip on the London Underground was 8.9 miles and, on average, surface rail trips are 30.9 miles. During lockdown, we have not all moved closer to our places of work. At an average trip distance of 13.4 miles, PTWs can clearly replace far more public transport trips than cycling, whilst also offering congestion reduction benefits over cars.

The majority of riders use their bike for commuting or for work. In 2019, 65% of all PTW trips were for commuting/business purposes in comparison with 18% of all modes<sup>8</sup>. Many riders wish to return to this, but it is being made difficult by changes in road layout and the approach to transport planning taken by the Government and local authorities.

During the Coronavirus pandemic, many motorcycle and scooter riders have been using their vehicles to volunteer. One example of this is the Bike Shed Community Response.<sup>10</sup>

At the time of writing some 1,100 riders were signed up to this service, running around 100 jobs a day across the UK, delivering food, PPE, Oximeters, medicine and many other items through over 40 partners. This service is delivering around 10-15 Oximeter probes a day in London alone, relieving pressure on emergency services during the pandemic.

In addition, the well-established 'blood bikers' - who provide a voluntary rapid response for hospitals transporting anything from platelets, plasma, serum and surgical instruments to patient's notes and X-rays - have been very active UK-wide during the pandemic.

The advantages of PTWs (they are manoeuvrable, able to bypass congestion and carry fragile and heavy items) make them ideal for transporting a variety of emergency medical items.

<sup>7</sup> MAG: New paper shows the cost of anti-motorcycle transport policy

<sup>8</sup> Ibid

<sup>9</sup> National Transport Survey: Purpose of travel

<sup>10</sup> The Bike Shed Community Response

Despite this we are consistently seeing PTWs ignored as a mode of transport during the pandemic, and a number of road closures put in place, or planned, which permit busses and cycles but not PTWs. By excluding PTWs, local authorities risk pushing riders back onto public transport or into cars, thereby removing a key advantage of PTWs.

In addition, reducing the number of streets PTWs can use will force them into smaller areas, thereby interacting with more traffic which risks increasing collisions. This is not in line with aspirations to reduce road traffic accidents and deaths.

We note that two trials of PTWs in 2009-10 and 2010-11 in London bus lanes produced no measurable negative impact on other road users (including cyclists and pedestrians), but significant improvements in safety for PTWs.

The findings of two independent studies of these trials conducted by Transport Research Laboratory included:

- Allowing PTWs in bus lanes had no significant impact on pedestrian collision rates.
- Allowing PTWs in bus lanes had no significant impact on cyclist collision rates.
- Evidence that PTWs using roads allowing access to bus lanes transferred activity

- from other roads.
- An increase in collisions for PTWs at trial sites in the initial study, mainly involving cars turning into or out of side roads. However, the second study showed that the increase in collisions in these bus lanes was half the increase seen on the remainder of the road network between the two study periods, suggesting that whilst dangers on London's roads were increasing for riders, lives were saved by allowing PTWs access to bus lanes.
- Bus speeds were unaffected by allowing PTWs to ride in bus lanes<sup>11</sup>.

PTWs have been allowed in some bus lanes in London for ten years and these findings have been borne out in that time. Similarly, PTWs access many city bus lanes in Bristol, Birmingham, Cardiff and Edinburgh, with no adverse effect on the safety or efficacy of other modes.

In addition, we would draw your attention to a report by the London Assembly Transport Committee in 2018<sup>12</sup> which drew the following conclusions:

"The Mayor and TfL need to get serious about ensuring motorcyclists can ride in all bus lanes. We are unconvinced that TfL is persuading boroughs to make this change with sufficient vigour. The rate of progress is far too slow and this is causing unnecessary risk for riders. TfL should provide whatever practical support boroughs need. Ultimately it might be necessary for the Mayor to use his financial leverage to make this change.

"We support the ongoing changes to roads to create Healthy Streets across London and make cycling and walking safer – good design for safe motorcycling must be implemented in the delivery of these schemes."

<sup>11</sup> London Assembly Transport Committee: Easy rider Improving motorcycle safety on London's roads

<sup>12</sup> London Assembly Transport Committee: Motorcycle safety in London: update report

Road Safety GB, which represents road safety professionals including officers working at all London boroughs, has also called for:

"A consistent policy across London to allow motorcyclists into all bus lanes. Currently motorcyclists are allowed into some bus lanes and not others, creating confusion amongst riders. By allowing motorcycles into all of London's bus lanes, this will enable the motorcyclist to make safer and easier progress by blending within the traffic."

We believe these principles can be applied UK-wide. We are therefore calling for PTWs to be welcomed into all bus lanes nationwide, including the new bus and cycle only areas which have put in place by local authorities as a way to manage traffic as we emerge from the pandemic. This would help to encourage socially distanced, congestion busting travel in a safe way.

We are concerned that many of these road closures are being implemented in a way that is not safe: for example, with temporary planters or bollards that are not appropriately marked or lit. Local authorities should ensure that all road closures are done in a way that is safe for all road users. We are concerned that there is talk of these road closures being made permanent. Given the lack of consultation or inclusion of PTWs in many of these schemes, this risks pushing PTW riders out of cities altogether, or onto more congested and dangerous routes. We note that even temporary measures can remain in place for up to 18 months.

We are particularly concerned that no mention of PTWs has been made in the Department for Transport guidance Reallocating road space in response to COVID-19: statutory guidance for local authorities or in any of the promotional material used by Government. This is especially prominent given the focus on so called e-scooters in Government literature which, unlike PTWs, are unregulated and require no training to operate.

The voices of motorcycle, scooter, and moped riders are not being heard. Our needs are not taken into account, despite statistically being one of the most vulnerable road user groups, and a clear part of the solution to travel during and after the Coronavirus crisis.

We are therefore calling on Government to recognise the role that PTWs should play as a transport mode as we recover from the Covid-19 pandemic and beyond. One way this can be done is by including consideration of PTW needs in the Department for Transport guidance Reallocating road space in response to COVID-19: statutory guidance for local authorities<sup>13</sup>, and promotional and other materials.

### **PTWs and road safety**

Statistically, PTWs are one of the most vulnerable road user groups. In 2018, PTWs made up 20% of all fatalities despite the fact that we account for less than 1% of all journeys<sup>14</sup>.

A study of 100,162 PTW crashes found that the most commonly occurring crash type involved vehicles turning right from a junction into the path of an oncoming motorcyclist from the rider's right.<sup>15</sup>

Small changes can significantly improve riding conditions for PTWs. For example, 'Think Bike' signs, awareness campaigns and better road surfacing. In addition, allowing us to use bus lanes has had an undeniably positive effect on our safety, as discussed above.

Despite the safety challenges, little or no money is allocated specifically for PTW safety in transport budgets. Additionally, we are being actively excluded from schemes which have been shown to have a positive effect on our safety, such as access to bus lanes.

<sup>13</sup> DfT: Reallocating road space in response to COVID-19: statutory guidance for local authorities

<sup>14</sup> DfT: Reported road casualties in Great Britain: 2018 annual report

<sup>15</sup> RoSPA Road Safety Research: Common Motorcycle Crash Causes

Despite the existence of publications such as the TFL Urban Motorcycle Design Handbook<sup>16</sup> we rarely see evidence that this guidance is consistently followed.

We are therefore calling for greater investment in PTW safety and recognition of our needs and vulnerabilities in road layout and design.

June 2020

<sup>16</sup> TfL: Urban Motorcycle Design Handbook

### **Testimonials from motorcycle and scooter riders about the value their vehicle brings to them and their environment.**

#### **Rachel, 33, London**

"I was attracted to riding a scooter seeing them filter past me while stuck in traffic in my car. When I developed asthma and started to find it impossible to take the tube due to its poor air quality, I decided to switch.

My commute – using a 125cc scooter - is quick, easy and enjoyable. I have replaced many car journeys with a much more efficient form of transport. Most of the journeys I take are too far to cycle or walk.

I am scared that the changes to London roads will force me back onto the tube, which will ultimately force me out of the city I love. I don't want to leave it or my family behind."

#### **Mark, Oxfordshire**

For me, motorcycling has always been the most efficient way to travel. My bike gets me all over the UK to visit business clients, to see friends and family and to get where and when I need to be quickly, cheaply and reliably.

I live in a rural area with almost no public transport. If I ride, it costs less than a third of the train fare, I can leave at a reasonable time and get a guaranteed seat (unlike the train). I can carry everything I need with me and I arrive smiling.

The plans to close roads to bikes are worrying. For those of us in rural areas who work in towns, closed roads and difficult access means less time with our families and friends.

#### **Alex, London**

"For the last year, I used several transport modes to commute from my home in West London to the City, including the Underground, bicycle and motorcycle.

Post-lockdown, motorcycling will be my preferred way of getting to work as it is easy to social distance. However, I am concerned that my route will be directly affected by the proposed road closures in London, and that this will negatively affect my ability to commute safely."

#### **Moussa Kaloga, London**

"I became a delivery rider in 2018. I live near Croydon and ride a 125cc scooter.

Being a delivery rider allows me to work in flexibly to support myself and my family. I work long hours travelling all over London. I couldn't do this job without my scooter.

The roads in London are dangerous enough for riders like me. Closing off roads is just going to make it more dangerous and harder for us to do our jobs. It may put some riders out of work."

## Appendix 2

<https://www.citymatters.london/bank-junction-fines-reap-12-5million/>

# Corporation reaps £12.5million in Bank Junction fines

By [Talia Shadwell](#) -  
12th March 2019

The City Corporation has reaped more than £12.5million in fines from motorists caught flouting its Bank Junction traffic restrictions – and is fielding more than 120 letters a day about it, new figures reveal.

Motorists caught flouting weekday restrictions that have seen the junction closed to all but buses and cyclists during peak hours can be hit with fines up to £135.

Although it couldn't say how many were complaints and how many were compliments, the body that governs the Square Mile has received plenty of correspondence about the ban.

Its Freedom of Information Act (FOI) response shows it received 68,441 letters about Bank Junction Penalty Charge Notices (PCNs) between its closure in May 2017 and 30 November 2018.

But the authority says it wants to see "100% compliance" with the restrictions – adding that it hopes the fines will make drivers think twice.

One black cab driver claims to have been stung by a fine when they strayed just metres into the penalty zone near the junction.

The cabbie, who wished to remain anonymous, said they were dropping off a customer at the exclusive Ned Hotel but because it falls within the restricted area, instead deposited her close-by on Lombard Street.

"Unbeknownst to me I went a few yards further than permitted (although still some distance from Bank) and I received a PCN," the cabbie said.

"I think it's extremely unfair that London taxis cannot access Bank Junction and also unfair that I and others are receiving PCNs for dropping people close to it."

The **restrictions have been in place since May 2017** in response to the death of a cyclist hit by a turning lorry. Councillors voted to make the restrictions permanent in late 2018.

During that period the Corporation has sent 15,496 warning letters and issued 217,061 PCNs over breaches of the rules.

The Corporation has recorded dramatic safety and air quality improvements in excess of its targets at the junction as a result of the closure.

But cabbies are still lobbying to regain access to the junction.

The Licensed Taxi Driver Association (LTDA) said its analysis had found longer journey times, resulting in higher fares, and knock-on effects on City traffic flows.

Chairman Richard Massett said that thinking transport needs in the Square Mile could be met while restricting taxi access to the vital junction was "flawed."

He added: "At the very heart of our objection to the ban is that licensed taxis are a vital form of public transportation, used by thousands of passengers every day, and if buses and cyclists are permitted to use the junction then taxis should be too."

"We are also aware of other less experienced road users, such as Ubers and other private hire vehicles, not observing the closure through ignorance."

A Corporation spokesman said the scheme prioritised safety: "We have made every effort to inform the public of the traffic restrictions at Bank Junction."

"As a safety scheme, our end goal is to see 100% compliance at the junction. The objective of the Penalty Charge Notices is to act as a deterrent."

By law all fines will go toward the funding of highway or road maintenance improvements.



## Appendix 2 – Comments to the traffic orders

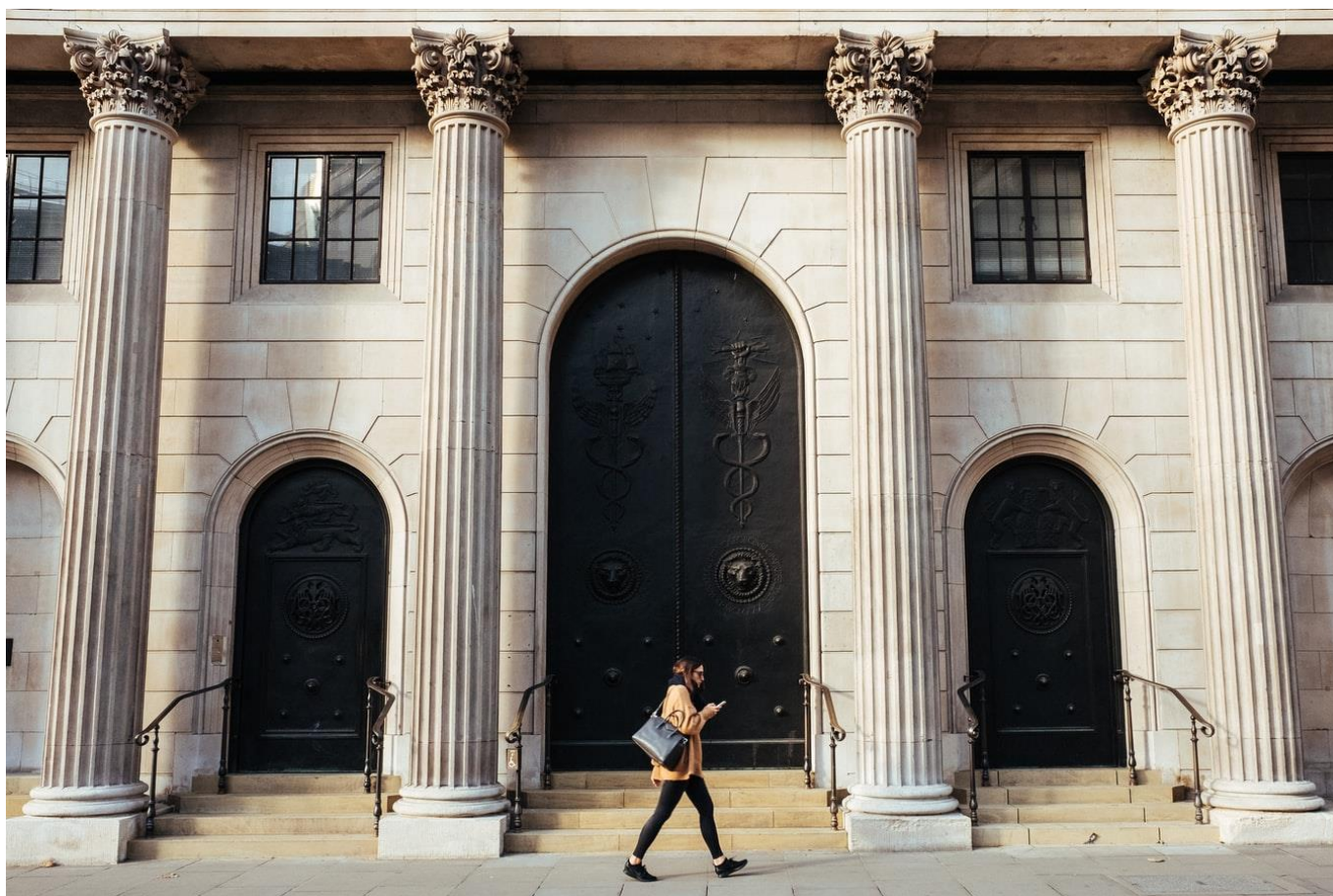
<b>Date:</b> 1/12/2021	<b>Name:</b>	<b>Address:</b> CoL Access Team
<b>Comments:</b> The Access Team and City of London Access Group (CoLAG) have been consulted on these proposals. It is important to reiterate the need for tactile paving for the full width of the raised carriageways to ensure that pedestrians are warned they are about to enter the carriageways.		
<b>Responses:</b> <a href="#">Comment Noted.</a>		

<b>Date:</b> 2/12/2021	<b>Name:</b> Correspondence 1	<b>Address:</b>
<b>Comments:</b> Don't you think it's about time that the London taxi had access to bank junction being part of transport for London		
<b>Responses:</b> <a href="https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation">Thank you for your comment to the recently advertised traffic orders at Bank (https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation).</a> We are not treating this as a formal objection to the traffic order being advertised.  Instead, this is being treated as a general comment. If you do not agree with the way that your response is being considered, then please respond to this email by stating the grounds that you are objecting on. This needs to be <b>received by Friday 4 February 2022</b> in order to be considered alongside the other objections in the statutory consultation decision report. This will be circulated to Members on the 7 February.  Relating to your comment; Included in the Committee approvals to proceed to Statutory Consultation on the traffic orders for Bank was a commitment to review the traffic mix and timings of the restrictions on the Poultry, King William/Lombard Street and Cornhill arms of the junction (if the project proceeds). This review will be undertaken at a time when the post pandemic traffic situation has regulated. This will ensure that we better understand what the right balance for the mix of traffic and time of the restrictions is. If the outcome of the review was to permit more types of vehicles for example, then the layout of the junction as proposed would not need to change and can be progressed by amending the traffic orders and signage.  Further information on the project can be found on our website: <a href="http://www.cityoflondon.gov.uk/allchangeatbank">www.cityoflondon.gov.uk/allchangeatbank</a>		

<b>Date:</b> 2/12/2021	<b>Name:</b> Correspondence 2	<b>Address:</b>
<b>Comments:</b> If taxis are part of TFL they should be allowed to use bank junction		
<b>Responses:</b> <p>Thank you for your comment to the recently advertised traffic orders at Bank (<a href="https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation">https://www.cityoflondon.gov.uk/services/streets/traffic-schemes-and-proposals/all-change-at-bank-traffic-order-consultation</a>). We are not treating this as a formal objection to the traffic order being advertised.</p> <p>Instead, this is being treated as a general comment. If you do not agree with the way that your response is being considered, then please respond to this email by stating the grounds that you are objecting on. This needs to be <b>received by Friday 4 February 2022</b> in order to be considered alongside the other objections in the statutory consultation decision report. This will be circulated to Members on the 7 February.</p> <p>Relating to your comment; Included in the Committee approvals to proceed to Statutory Consultation on the traffic orders for Bank was a commitment to review the traffic mix and timings of the restrictions on the Poultry, King William/Lombard Street and Cornhill arms of the junction (if the project proceeds). This review will be undertaken at a time when the post pandemic traffic situation has regulated. This will ensure that we better understand what the right balance for the mix of traffic and time of the restrictions is. If the outcome of the review was to permit more types of vehicles for example, then the layout of the junction as proposed would not need to change and can be progressed by amending the traffic orders and signage.</p> <p>Further information on the project can be found on our website: <a href="http://www.cityoflondon.gov.uk/allchangeatbank">www.cityoflondon.gov.uk/allchangeatbank</a></p>		

# All Change at Bank: Equality Impact Assessment

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# All Change at Bank: Equality Impact Assessment

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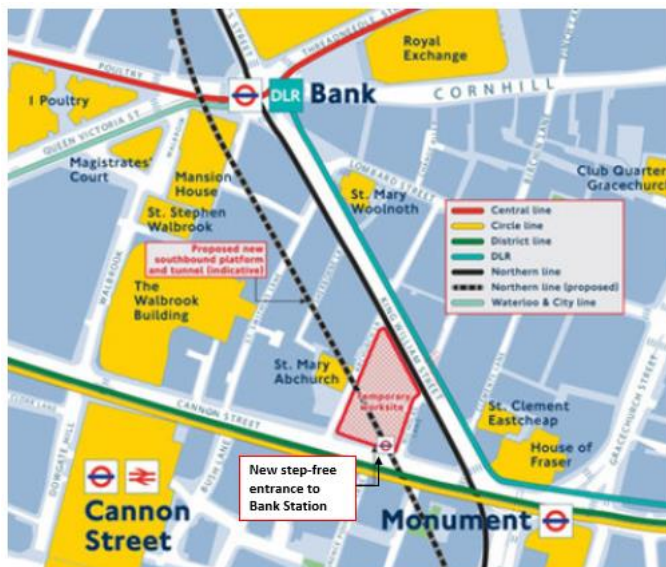
# 1 Introduction

- 1.1 This Equality Analysis (EA) relates to the City of London's ("the City's") All Change at Bank scheme. The All Change at Bank scheme sits separate to the Bank on Safety scheme and the Bank Station Capacity Upgrade. For context, a short summary of each scheme has been provided within this section of the report.
- 1.2 The City of London is ensuring that accessibility needs are fully considered in the design of the scheme, providing an auditable document trail that sets out design considerations and decisions. An Accessibility Audit for the All Change at Bank scheme has also been developed, and is intended to complement this EA. The Accessibility Audit forms part of that process and has been prepared during the detailed design phase of the scheme development. It examines accessibility issues and pays particular attention to vulnerable user groups.

## Bank Station Capacity Upgrade

- 1.3 This Transport for London (TfL) project is a reconstruction of Bank station and will upgrade station capacity to enable movement of 40% more passengers. In addition, a new step-free access, shown in Figure 1-1, will be constructed on Cannon Street, west of King William Street. This will provide access to the Northern Line and Docklands Light Railway. This project is expected to be complete in 2022.

**Figure 1-1: New step-free access at Bank station**



Source: Transport for London (<https://tfl.gov.uk/travel-information/improvements-and-projects/bank-and-monument>)



## Bank on Safety

- 1.4 The Bank on Safety scheme has restricted vehicle movements between Monday and Friday from 7am-7pm, allowing buses and cycles permission to cross Bank Junction or enter Cornhill in a westbound direction. Pedestrian crossings have been improved and footways widened at the junction along with cycle facility upgrades.

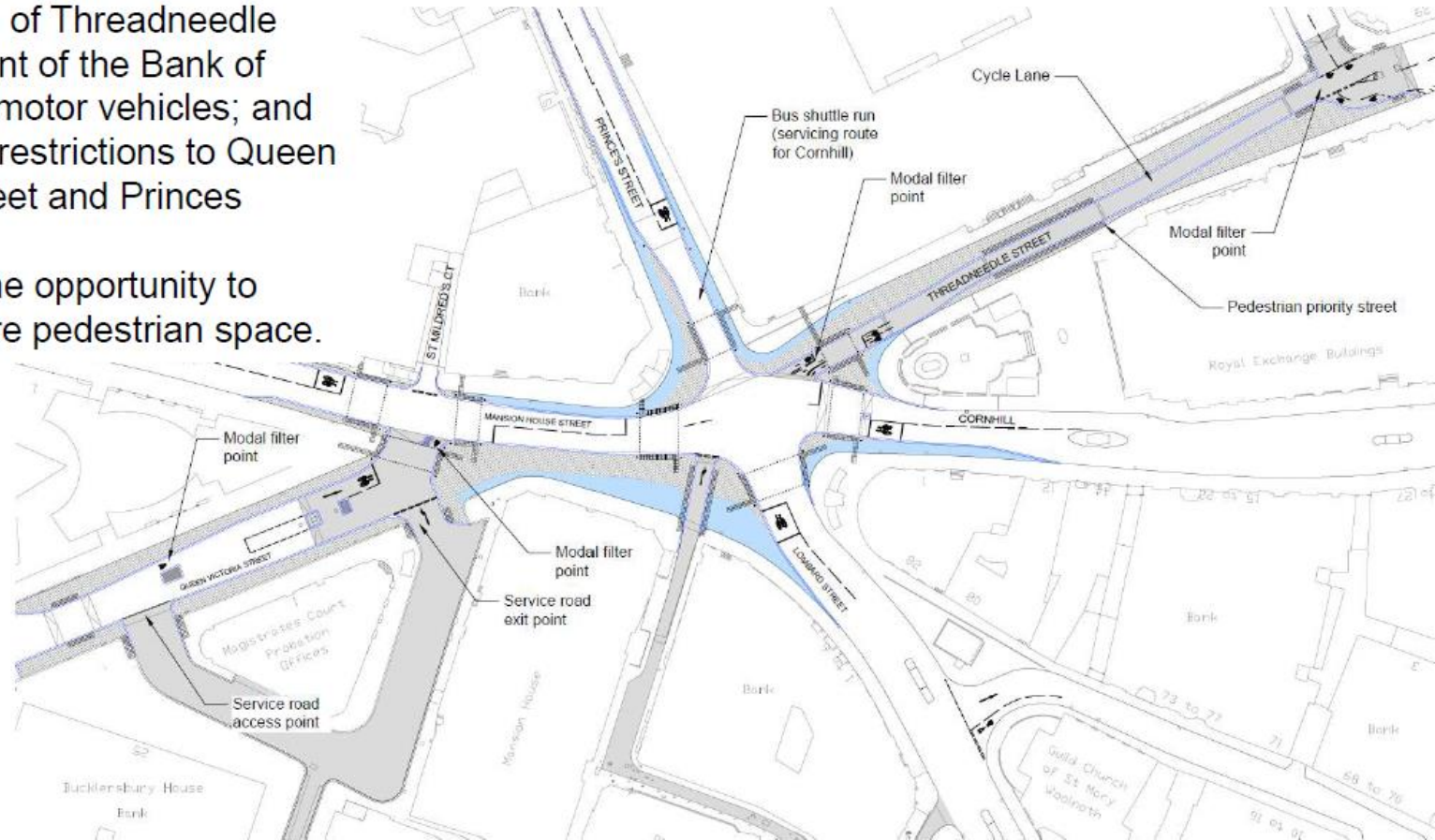
## All Change at Bank

- 1.5 The All Change at Bank scheme sits separate to the Bank on Safety scheme and seeks to bring transformative change to Bank Junction for the longer term. The scheme has the following objectives:
- An improvement in safety at Bank junction
  - An improvement in air quality at Bank junction
  - An improvement in pedestrian experience at Bank junction (in terms of comfort and the experience as a place to spend time in)
- 1.6 Between March 29<sup>th</sup> and May 10<sup>th</sup> 2021, a public consultation was undertaken to collect feedback on the preferred scheme for the redesign of Bank junction. The proposed All Change at Bank improvements include:
- The closure of Threadneedle Street for motor vehicles between Bank Junction and Bartholomew Lane in both directions to create a walking and cycling only area.
  - The closure of Queen Victoria Street between Bucklersbury and Bank Junction for motor vehicles, except those vehicles exiting Walbrook in a westbound direction.
  - Keeping Princes Street open for only buses and cycles northbound, and in addition as a route for servicing to Cornhill in a southbound direction.
  - Widening pavements around the junction to accommodate the large number of people who walk through the area normally
- 1.7 These restrictions are accompanied other design features including widening of pavements, redesign of crossings with raised carriageways, and the inclusion of new planters and benches.
- 1.8 The design requires some alterations to bus routes (primarily 133, 26, 8, and 11) – 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 – and do not lead to significant increase in journey times.
- 1.9 The City of London has already completed a Test of Relevance for the All Change at Bank scheme. This identified the following four Protected Characteristic Groups (PCGs) for assessment: Age, Disability, Pregnancy/Maternity, and Race.
- 1.10 This EqIA has been completed on behalf of the City of London to assess the overall impact of the project for all road users and for those in Protected Characteristic Groups. This EqIA has been completed prior to the implementation of the design to pre-empt any impacts upon these groups and suggest alterations and additions where they may be necessary.
- 1.11 This EqIA is based on information supplied by the City of London as well as readily available data from other sources. This includes traffic counts, pedestrian and cyclist counts, bus journey time modelling and background information through the Bank on Safety scheme. At this stage, the transportation response to support Covid-19 recovery measures that are currently in place in the City have not been included as part of the All Change at Bank in this analysis.

Figure 1-2: All Change at Bank redesign

### The proposal is:

- The closure of Threadneedle Street in front of the Bank of England to motor vehicles; and
- The further restrictions to Queen Victoria Street and Princes Street.
- Maximise the opportunity to provide more pedestrian space.



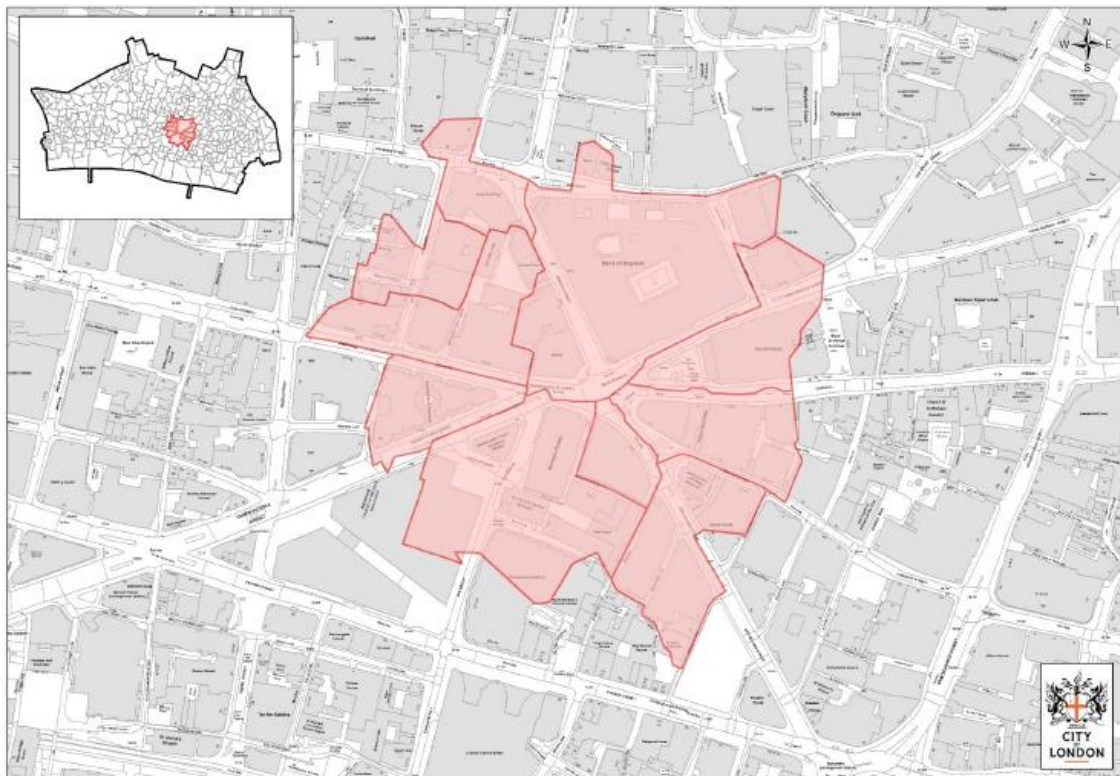
Source: City of London

## 2 Baseline

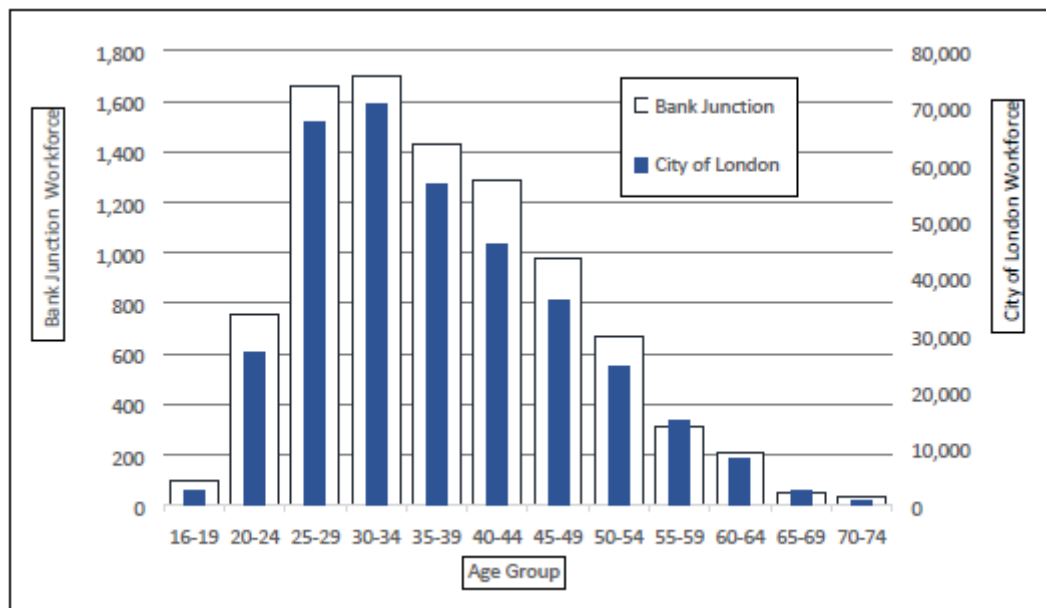
### General

- 2.1 The City of London (“the City”) has a very large workforce in comparison to its usual residential population. The 2011 Census recorded the residential population as 7,400 people and the work force as 357,000 people – almost 50 times the usual residential population which demonstrates significant movement in and out of the City every day.
- 2.2 The workforce located within the Bank Junction Workplace Zone, as defined in the zone shown in Figure 2-1, amounts to 9,100 people. It can be seen in Figure 2-2 that the age profile for the Bank Junction Workplace Zone follows a similar trend to that of the City of London workforce, where the highest age group is those aged 30-34. The workforce in the Bank Junction Workplace Zone is lower when compared to those aged 55+ within the City.

**Figure 2-1: Bank on Safety 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**

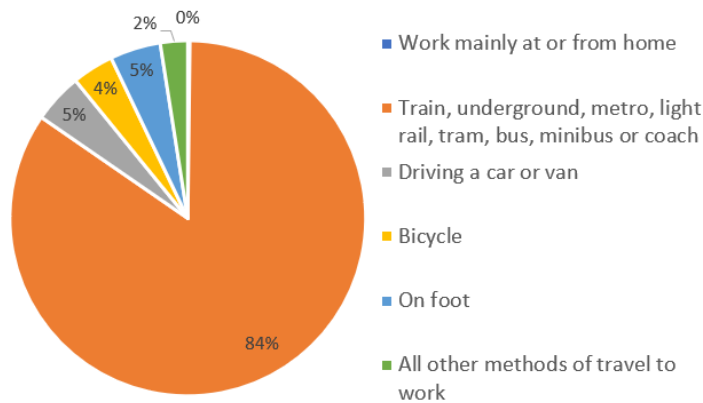
Source: Bank on Safety Equality Analysis with data from Census 2011

- 2.3 More recently, the Office for National Statistics (ONS) mid-2019 estimates show an increase in the City of London residential population to 9,700 people while the 2018 workforce was estimated to be 522,000<sup>1</sup>. The City shows the highest workplace density out of all boroughs in Greater London with the primary land use in the City being offices, which make up more than 70% of all buildings. In absolute terms, the City has the second greatest workforce after the City of Westminster, with a gender split of 64% males and 36% females in 2019<sup>2</sup>.
- 2.4 When compared to Greater London, the City of London 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 the City.
- 2.5 Census data shows that of those travelling to the City of London for work, 38% have trips of 10km or less. 36% of trips are between 10km and 30km, while 16% are within 30km and 50km and 9% are 60km or more. Overall, 84% of the workforce uses public transport to travel to the City of London for work, shown in Figure 2-3.
- 2.6 Please note that these figures may change significantly due to the change in working arrangements and patterns attributed to Covid-19, however the CoL can only act on the latest data available.

<sup>1</sup> <https://www.cityoflondon.gov.uk/supporting-businesses/economic-research/statistics-about-the-city>

<sup>2</sup> <https://www.citywomen.co.uk/wp-content/uploads/2020/02/city-of-london-jobs-factsheet.pdf>

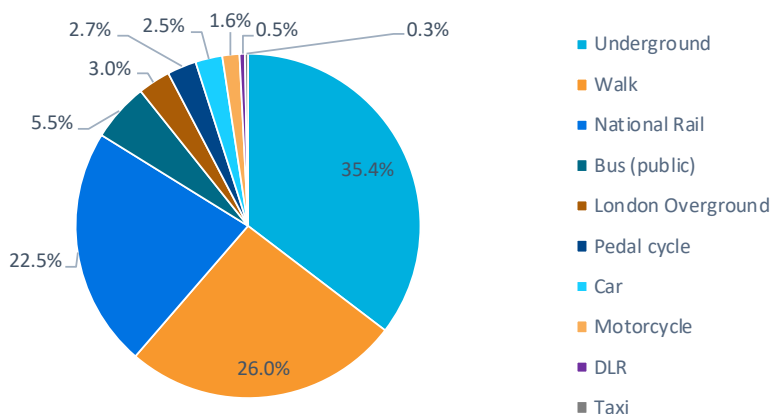
**Figure 2-3: Method of travel to work for those with a workplace in the City of London**



Source: 2011 Census

- 2.7 Data from TfL's London Travel Demand Survey (LTDS) 2018/19 has been analysed to inform this EA, to understand any differences in the travel patterns exhibited by different PCGs. LTDS is a continuous household survey of the London area, covering all London boroughs, including the City of London. The survey records detailed information about the household, the people that live there, and the trips they make.
- 2.8 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 EA, trips that ended in the City of London 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.
- 2.9 When analysing LTDS for all trip purposes, the following mode split for travel into the City was obtained. As shown in Figure 2-4, of all trips ending in the City of London, 66.9% are made using public transport. 35.4% of trips are made using the Underground, 0.5% are made using Docklands Light Rail (DLR) and 5.5% are made by public bus. It can also be seen that walking has a much higher proportion for all trips (26%) when compared to the Census 2011 Travel to Work data (5%).

**Figure 2-4: Method of travel to the City of London for all purposes**

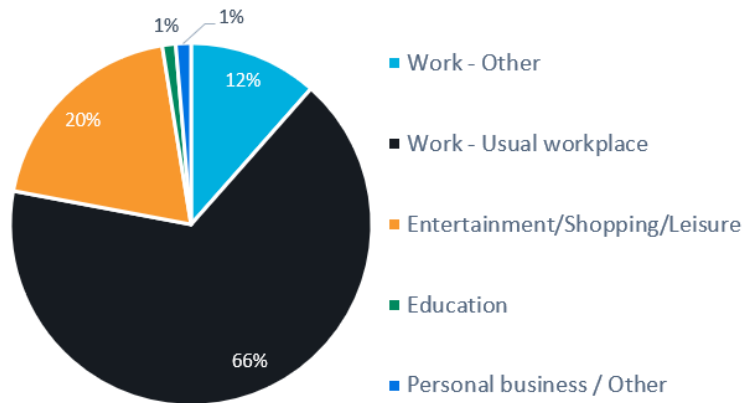


Source: LTDS 2018/19



- 2.10 Please note that this mode split involves other trip types in addition to ‘travel to work’ trips. The top 5 journey purposes are displayed in Figure 2-5 below. Based on trip analysis using LTDS data, 66% of trips made are for the purposes of travelling to their usual place of work.

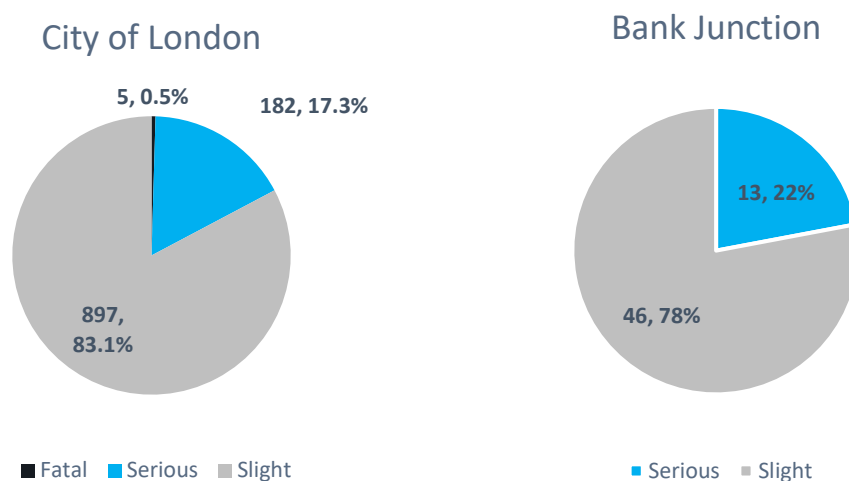
**Figure 2-5: Top trip purposes for travel to the City of London**



Source: LTDS 2018/19

- 2.11 Based on 2016-2018 STATS19 data (the United Kingdom’s (UK) database containing a record of reported road traffic accidents), collisions across the whole of City of London involved 1,084 casualties, 5 of which resulted in a fatal casualty and 182 of which resulted in a serious injury, shown in Figure 2-6. At Bank junction, 59 collisions have occurred within the junction area from 2016 to 2018, of which 46 resulted in a serious injury.

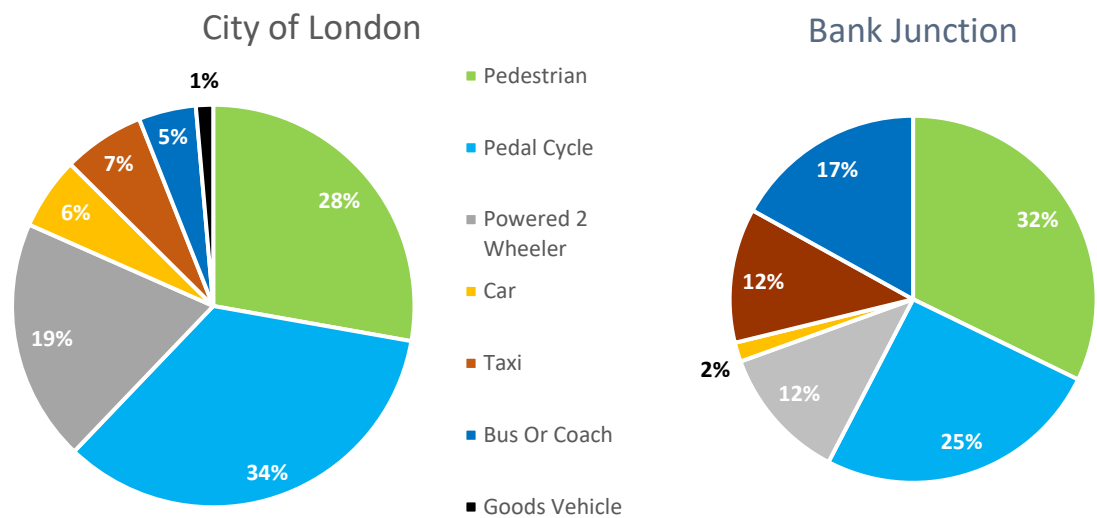
**Figure 2-6: Casualty severities**



Source: STATS19 2016-2018

- 2.12 Figure 2-7 below shows the casualty travel mode splits in the City of London and Bank junction. It can be seen that casualties using active modes accounted for 62% and 57% of all casualties involved in collisions in the City of London and Bank junction, respectively. Bus or taxi casualties resulted in a higher proportion of casualties at Bank junction compared to the City of London. It should be noted that ‘Single bus or coach’ collisions are often described as passengers’ falls due to sudden braking, and they rarely involve any vehicle impact.

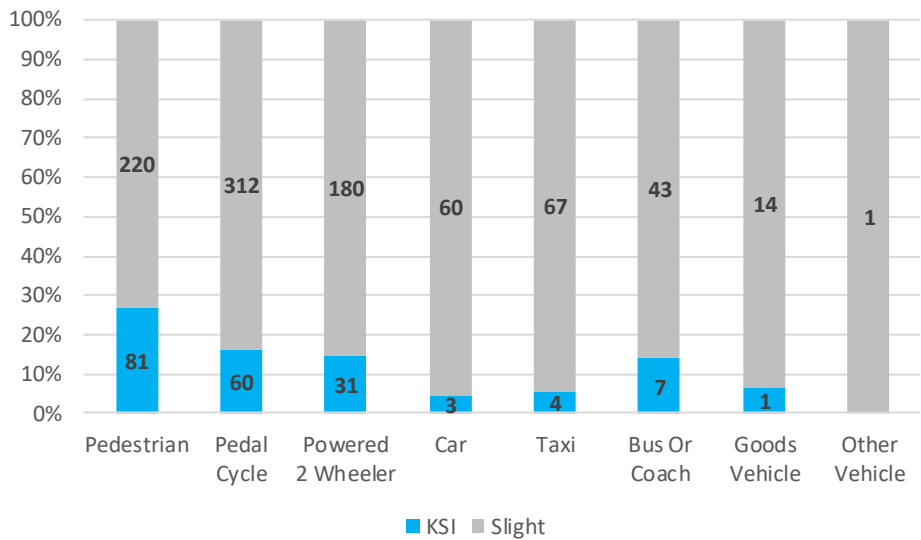
Figure 2-7: Mode of travel for casualties involved in collisions



Source: STATS19 2016-2018

2.13 Figure 2-8 shows the proportion of Killed or Seriously Injured (KSI) and Slight casualties per mode of travel. KSIs account for 17% of all casualties involved in collisions from 2016-2018 in the City of London. Based on this, KSIs for pedestrians are much higher than the average at 27%.

Figure 2-8: Proportion of KSI and Slight casualties per mode of travel in the City of London

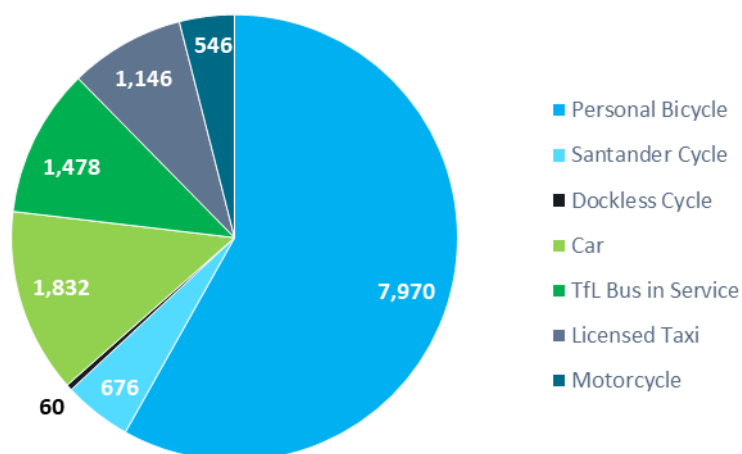


Source: STATS19 2016-2018

2.14 A traffic count was undertaken at Bank junction for the Bank on Safety project on 19 November 2019 between 5:00-10:00 and 16:00-21:00. This counted all vehicle movements and excluding pedestrian movements. During these timeframes, 14,351 movements were recorded. Figure 2-9 shows a breakdown of selected modes that may have an impact certain PCGs.

- 2.15 It can be seen that based on movements only, with the Bank on Safety scheme in place, cyclists account for the majority of 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 2-9: Bank on Safety traffic counts – Passenger modes that may affect certain PCGs**



Source: 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 by junction arm - Selected modes that may affect certain PCGs**

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 PCGs (ex. LGV, HGV). Please note these are vehicle movements and not the total number of passengers.

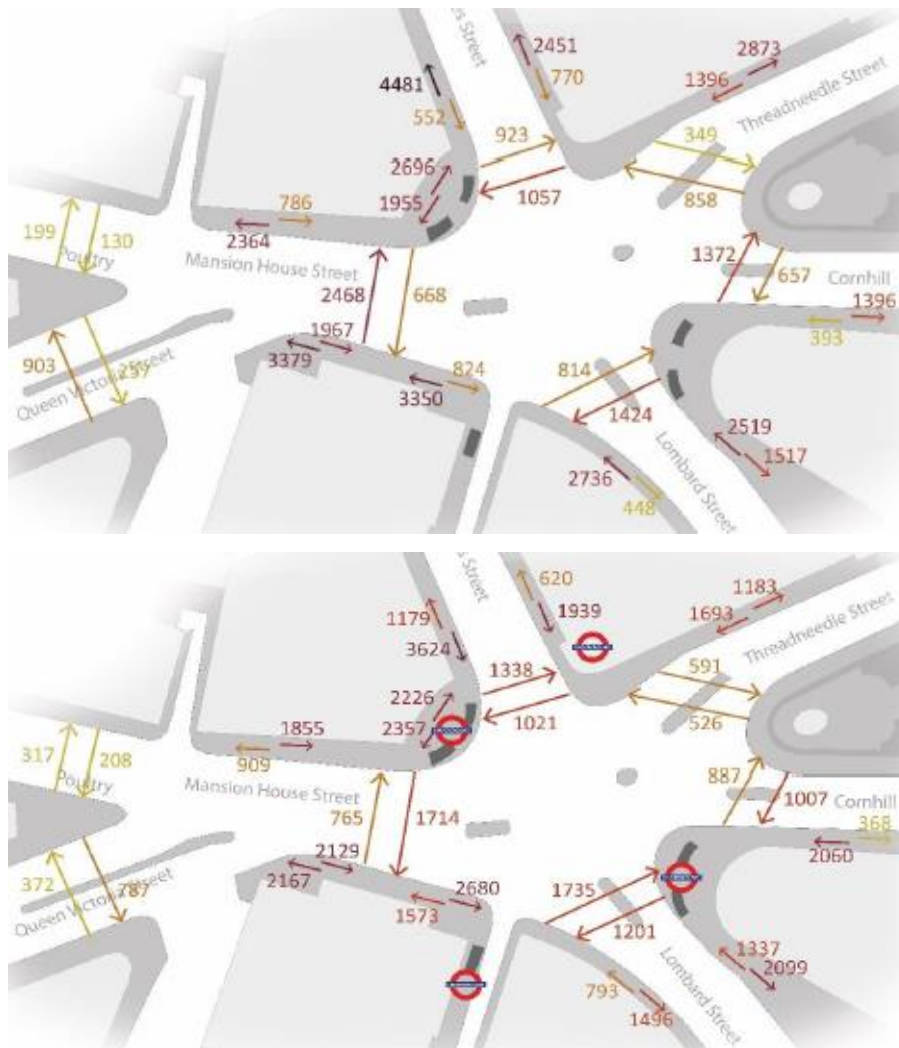
- 2.16 Pedestrian counts from the Bank on Safety project in 2018<sup>3</sup> show approximately 59,000 and 54,000 pedestrian movements in the AM (8:00-9:00) and PM (17:00-18:00) peak periods, respectively. The same study counted 2,200 cyclist movements in the AM Peak (8:00-9:00). Figure 2-10 shows the locations and counts of pedestrian movements while Figure 2-11 shows the existing pedestrian comfort levels as of November 2018. In both the AM and PM peak periods, the highest single flow occurred on Princes Street while the highest two-way flow

<sup>3</sup> Bank on Safety – Pedestrian and Cyclist Movement Update, City of London (November 2018).



occurred on the southern footway of Mansion House Street. The 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 2-10: 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 2-11: Pedestrian comfort levels**



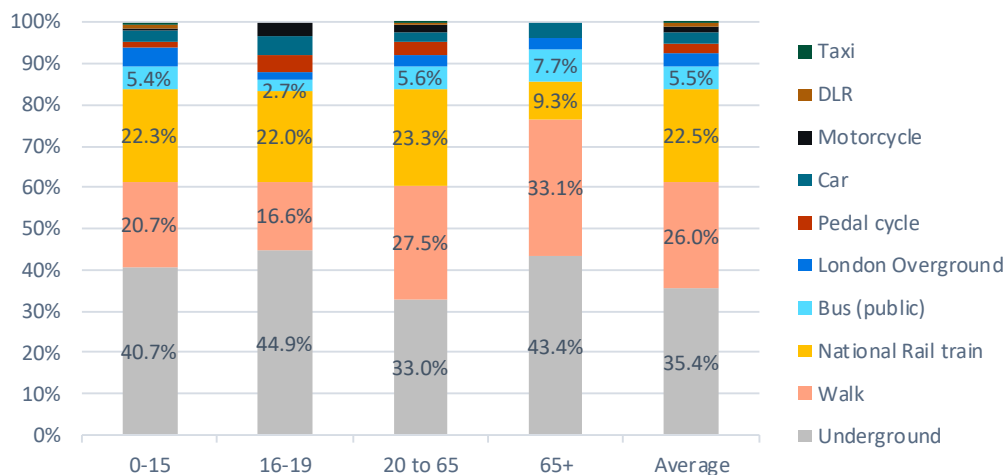
- 2.17 The traffic and pedestrian counts demonstrate that Bank junction is most used by pedestrians, and when looking at vehicle movements, this is followed by cyclists, private car, TfL bus services and licensed taxis. At this time, we do not have exact bus passenger numbers. This demonstrates that the pedestrian priority measures to be 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.

## Age

- 2.18 Based on 2011 Census data, the City has approximately 7,400 residents, 55% of these being male and 45% of these being female. The majority of residents fall within the 25-29 and 30-34 age groups for both genders. When compared to Greater London, The City has proportionately more people aged between 25 and 69 living in the Square Mile. Conversely there are fewer young people<sup>4</sup>. Those aged over 60 represent 20% of the residential population.
- 2.19 When looking at Census data focusing on the workforce in the City, the majority of workforce ages again fall within the 25-29 and 30-34 age categories for both genders, making up 39% of the total workforce. Those aged between 16 and 24 only make up 9% of the workforce population. It can also be noted that as age increases, there is a steady decrease in the proportion of the workforce within each age category. The age categories of 60-64 and 65+ represents 2% and 1% of the workforce population, respectively.
- 2.20 The Census data for each age category shows that 78%-85% 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%) and steadily increases as age increases. This proportion also is also slightly higher for the 20-24 (3%) and 16-19 (5%) age groups. A disproportionately high percentage of those aged 65 to 75 rely on driving a car or van (11%) to travel to work. Generally, as age increases, reliance on driving a car or van to travel to work increases.
- 2.21 The highest proportion of cyclists (5%) are within the 25-29 and 30-34 age categories. Cycling as a mode share decreases with age, falling to 1% 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% and 8%). The proportion of walkers remains steady at 3% from age 35 to 64 and increases slightly to 4% for those aged 65 to 74.
- 2.22 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.
- 2.23 LTDS 2018/19 analysis for trips made for all purposes ending in the City shows the following mode shares, Figure 2-12, per age category.

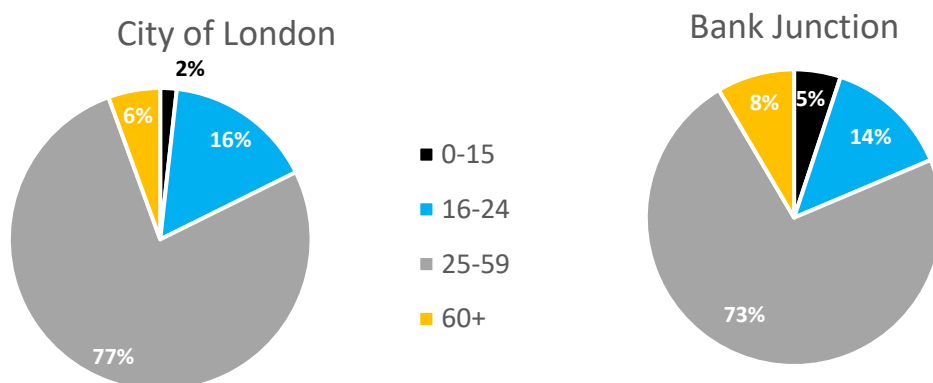
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<sup>4</sup> <https://democracy.cityoflondon.gov.uk/documents/s18096/census-information-reports-introduction-november-2012.pdf>

**Figure 2-12: Mode split by age category for travel to the City of London**

Source: LTDS 2018/19

- 2.24 Those aged 65+ have a higher mode split of walking, bus and Underground compared to the baseline, with no cycling and higher car use. Those aged 0 to 15 have a similar mode split to the baseline, however walking is lower while Underground use is higher. Those aged 16 to 19 show a higher proportion of car use and Underground, and a lower proportion for walk or bus services.
- 2.25 Figure 2-13 shows collision casualties by age category. It can be seen that compared to the City as a whole, those aged 60+ and those aged 15 and below account for a slightly higher proportion of casualties at Bank junction, at 8% and 5%, respectively. This is likely to reflect the lower proportions of people in these age groups moving around the City, relative to the predominant 25–59 age group.

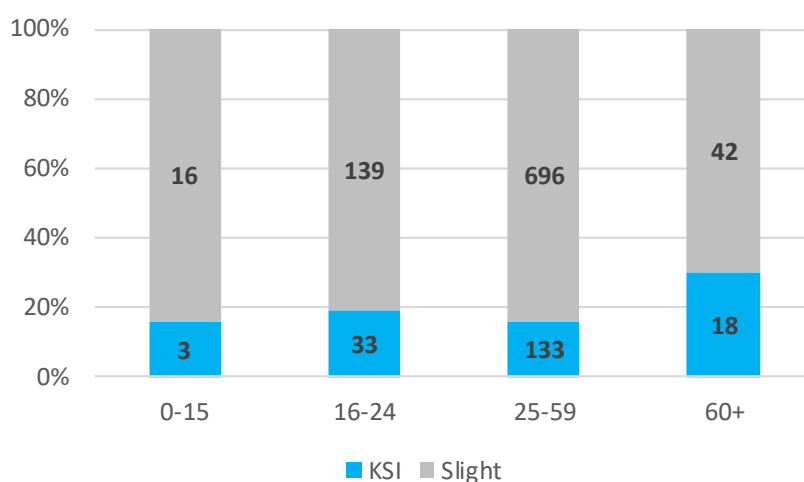
**Figure 2-13: Age of casualties involved in collisions**

Source: STATS19 2016-2018

- 2.26 The proportion of KSI and Slight casualties per age category in the City of London is shown in Figure 2-13 below. On average across all age groups, KSIs account for 17% of all casualties involved in collisions from 2016-2018 in the City of London. Based on this, KSIs are higher than average for those age 60+ (30%) and those aged 16-24 (19%). As such, this indicates that these

age groups are disproportionately more likely to suffer more severe consequences if they are a casualty in a collision.

**Figure 2-14: Proportion of F&S and Slight casualties involved in collisions per age category**



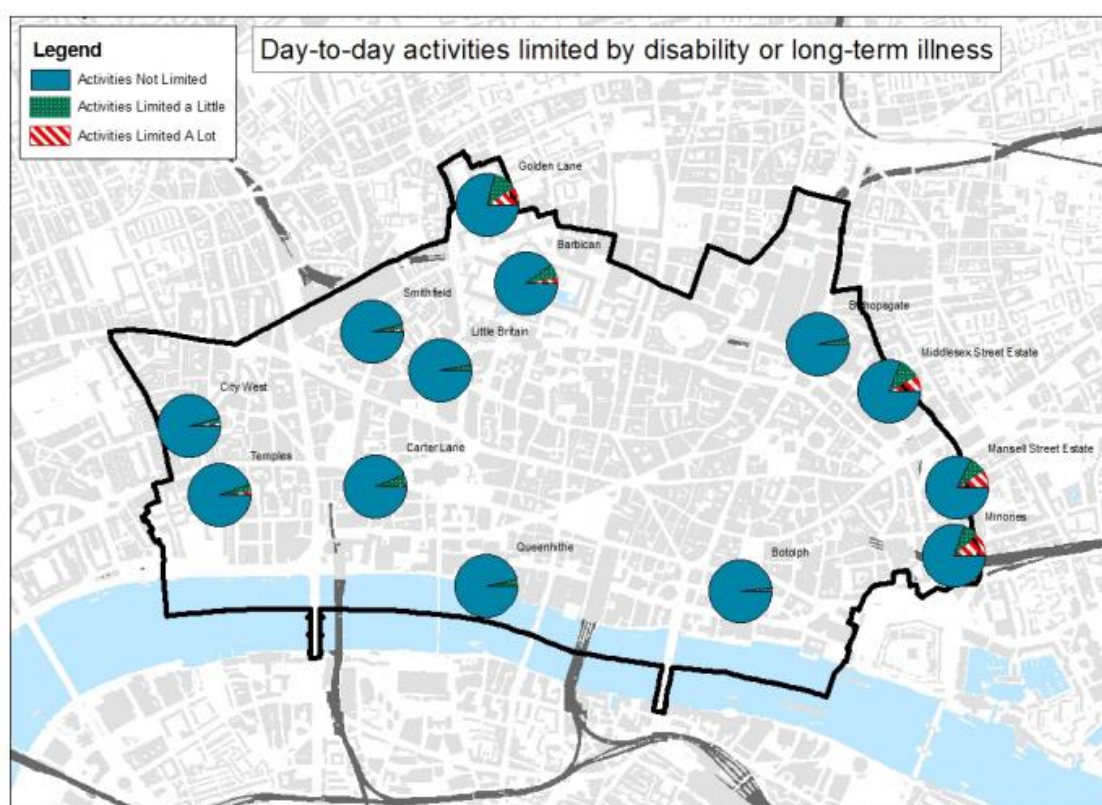
Source: STATS19 2016-2018

## Disability

- 2.27 Day-to-day activities can be limited by disability or long-term illness. In the City of London as a whole, 89% of residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of residents responded that their activities were not limited. 12% of the residential population stated that they were either in fair, bad or very bad health.
- 2.28 The spatial distribution of health-based activity limitations can be seen in Figure 2-15 based on Census data<sup>5</sup>. Generally, areas to the east of the City and north of the City are more likely to have activities limited by disability or long-term illness.

<sup>5</sup> <https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics>

**Figure 2-15: Day-to-day activities limited by disability or long-term illness**



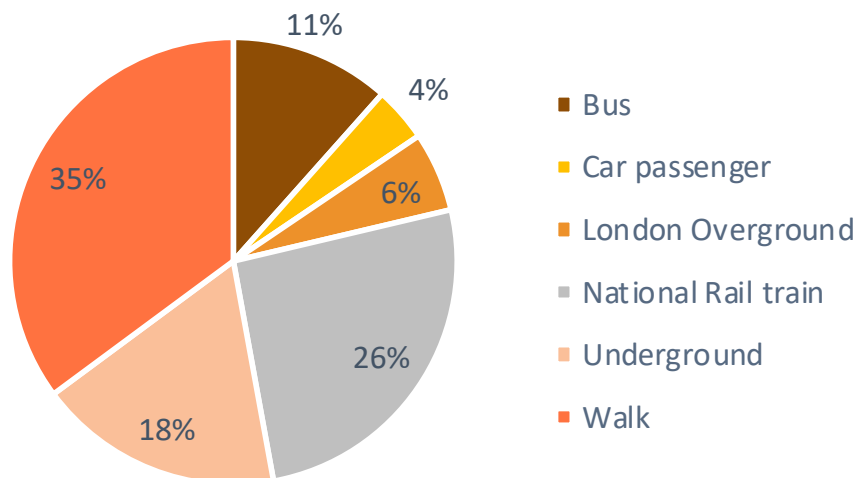
Source: Census 2011

- 2.29 1.7% of the residential population in the City are blue badge holders, which is in the bottom five local authorities for the number of blue badges across the United Kingdom<sup>6</sup>.
- 2.30 Across the UK focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey<sup>7</sup> shows that 72% of disabled cyclists use their bike as a mobility aid, and 75% found cycling easier than walking. Survey results also show that 24% of disabled cyclists bike 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.
- 2.31 LTDS 2018/19 analysis shows that 1.8% of trips made into the City of London 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 2-16.

<sup>6</sup> [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>7</sup>Wheels for wellbeing annual survey 2018: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf>

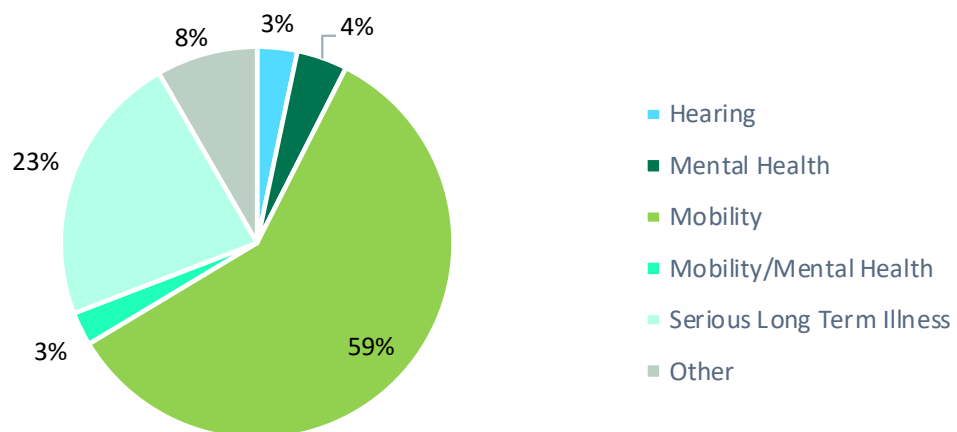
**Figure 2-16: Mode split by people with a physical or mental disability affecting daily travel (including old age)**



Source: LTDS 2018/19

- 2.32 When comparing to the LTDS mode split of trips made by all people, bus use for those with disabilities is twice as high (11% compared to 5%), car trips are higher (4% compared to 2.5%) and walking is significantly higher (35% compared to 25%). Disability types stated by those who have a disability affecting daily travel (including old age) are shown in Figure 2-17 below.

**Figure 2-17: Disability types stated by those who have a disability affecting daily travel**



Source: LTDS 2018/19

- 2.33 It can be seen that mobility impairment represents the highest proportion followed by impairment due to serious long-term illness. It should be noted that this data is based on a very small sample (1.8% of sample size for trips ending in the City of London), therefore results should be taken as general. It is important to note that various physical and mental disabilities can lead to travel limitations.



## Pregnancy / maternity

- 2.34 The birth rate in the City of London was 7.9 births per 1000 people in 2016, approximately 33% below the national average that year of 11.9. Therefore, there are statistically less likely to be pregnant and maternal people who reside in the City. However, this represents only the residents of the City, and not the 522,000 people who work in the Square Mile, principally a working population. A proportion of this workforce will be pregnant and/or have infants or small children at any point in time.
- 2.35 Considering that the residential population of the City of London 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 the City at any given time. However, the numbers of pregnant women or parents with infants and/or young children that travel in and out of the City for work or leisure purposes may be higher.

## Race

- 2.36 68% of the City's residential population hold a UK passport and 14% hold non-European passports. When looking at race per area in the City, 79% of the residential population is 'White'. There is a higher proportion of Asian population (47%) on Mansell Street, to the east of the study area, when compared to other areas in the City where the Asian population across the City is 13%<sup>8</sup>.
- 2.37 The Asian population is approximately evenly split between Asian-Indian, Asian-Bangladeshi, Asian-Chinese and Asian-Other. The City 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%. The remaining population identifies as mixed ethnicity (4%) or other.
- 2.38 TfL data, for Greater London, shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65% compared with 56% 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%<sup>9</sup>.
- 2.39 Mode split by ethnicity, based on LTDS 2018/19 analysis is shown in Figure 2-18.

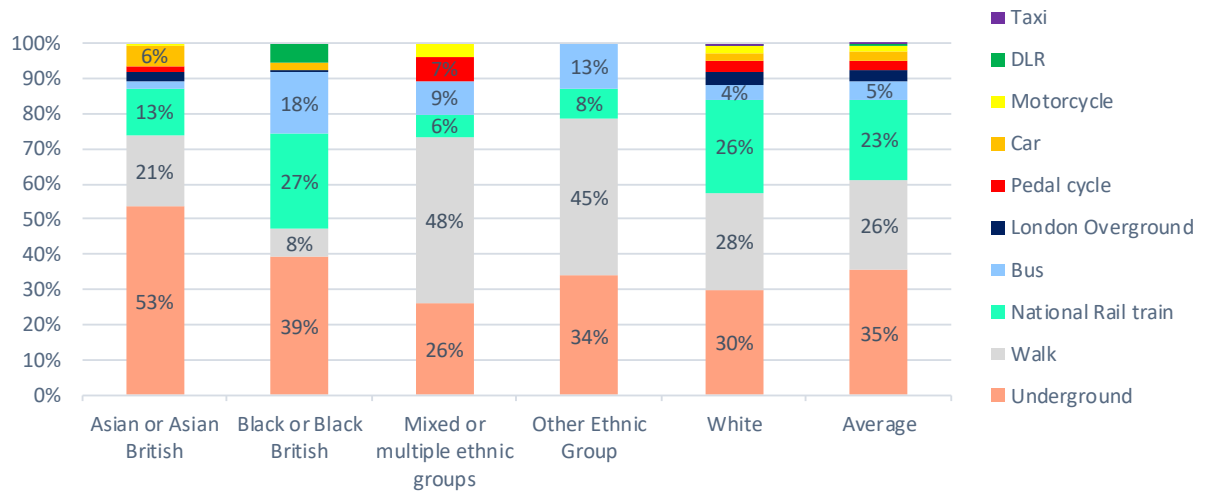
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<sup>8</sup> <https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics>

<sup>9</sup> <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>



**Figure 2-18: Mode split by ethnicity**



Source: LTDS 2018/19

- 2.40 Based on average travel modes to the City of London from the 2018-19 LTDS data, Black or Black British, Mixed or Multiple Ethnic Groups, and Other Ethnic Groups are more likely to use public buses. Asian or Asian British are more likely to drive (6%). Mixed or Multiple Ethnic Groups are more likely to cycle (7%). Both Mixed Multiple Ethnic groups and Other Ethnic Groups are much more likely to walk (45% and 45%, respectively). Again, it should be noted that these percentages may not be precise due to low sample sizes.

## 3 Overall impact on Bank junction movements

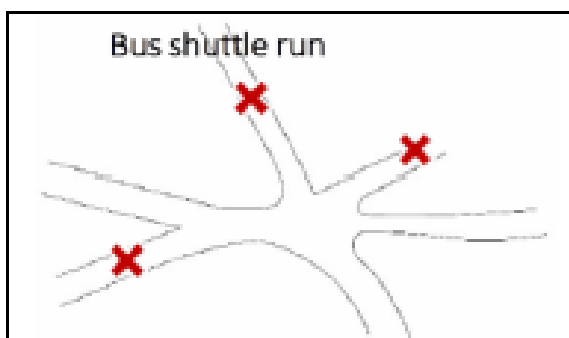
3.1 This section outlines the overall impact on vehicular and pedestrian movements at Bank junction and the impact of the new design. Consideration is given as to how the proposed design would affect movement for the following users:

- Pedestrians
- Cyclists
- Buses
- Taxis
- General motor traffic

3.2 The changes involve restricting access to Princes Street, with only buses and cyclists permitted using a shuttle run, as well as vehicles servicing Cornhill. Both Threadneedle Street and Queen Victoria Street would be closed to motorised vehicles, with access permitted for cyclists only. Pedestrians are not restricted in their movements across, between or through any of the junction arms.

3.3 These restrictions are illustrated in Figure 3-1 below.

**Figure 3-1: Vehicular restrictions**



### **Pedestrians**

3.4 Movement of pedestrians between or through any of the junction arms will not be restricted in any way. Both Threadneedle Street and Queen Victoria Street would become pedestrian priority streets. No through traffic would be permitted to motor vehicles, other than for essential servicing.

3.5 The highest two-way pedestrian flow occurs at the southern footway of Mansion House Street. The majority of informal pedestrian crossings occurs at the Queen Victoria Street arm between the southern footway of Mansion House and Walbrook. Providing pedestrian priority in this area would increase safety and experience for a large number of pedestrians.

- 3.6 Footways would also be widened on Princes Street, Poultry, Lombard Street, Mansion House Street and Cornhill. Placemaking design features such as planters and benches are included within the design, however, are not expected to have a significant impact upon pedestrian comfort levels and have been designed to avoid the most popular pedestrian desire lines. Several pedestrian crossings are to be redesigned and narrowed – leading to a safer and more convenient experience for pedestrians.
- 3.7 An assessment of the forecast pedestrian comfort levels of the design has been undertaken. The results from this assessment are presented within Table 3-1 below. A site plan is presented within Figure 3-2.
- 3.8 The table provides a comparison between the worst-case peak hour pedestrian comfort levels for the All Change at Bank scheme, against the recently completed Bank on Safety footway widening work, as well as the pedestrian comfort level prior to any changes. Note that the All Change at Bank flows assume no pedestrian growth.

**Table 3-1: Pedestrian comfort level assessment**

Site description	Site plan ref #	Pre-scheme (no footway changes)	Bank on Safety	All Change at Bank
Princes Street western footway	1	E	C-	C+
Princes Street eastern footway	2	D	C+	B
Threadneedle footway	3	E	E	B-
Cornhill RE footway	4	B-	B-	B-
Cornhill southern footway east	5	C+	C+	C+
Cornhill southern footway west	6	B	A-	A-
Lombard 1	7	F	F	F
Lombard 2	8	F	F	F
Lombard 3	9	C	C	C
Lombard 4	10	C-	C-	C
MH1	11	D	B+	A-
MH2	12	E	C-	B+
MH3	13	B-	B+	B+
MH4	14	D	B-	B+
QVS1	15	A-	A-	A
QVS1	16	A	A	A
Poultry 1	17	C+	C+	B

**Figure 3-2: Pedestrian comfort level assessment – site plan**

- 3.9 The All Change at Bank scheme will also increase pedestrian crossing widths and reduce crossing distances. Table 3-2 presents a comparison between the existing Bank on Safety conditions, and the proposed All Change at Bank conditions:

**Table 3-2: Crossing distances and crossing widths**

Location	Crossing distances		Crossing widths	
	Bank on Safety (metres)	All Change at Bank (metres)	Bank on Safety (metres)	All Change at Bank (metres)
Poultry	12.5	7.4	3.2	6.0
Mansion House Street	11.0	6.4	4.8	7.0
Princes Street	8.4	4.5	4.8	8.0
Threadneedle Street	10.1	4.0	4.0	6.0
Cornhill	8.8	8.0	4.0	6.0
King William Street	10.2	9.9	4.8	6.0
Queen Victoria Street	13.2	9.7	2.8	4.0

### Cyclists

- 3.10 Princes Street and Queen Victoria Street see the highest volume of cyclists – 1,881 and 1,549, respectively (following Lombard Street/King William Street). Restricting traffic and improving cycle infrastructure would benefit all cyclists.
- 3.11 As with pedestrians, cyclists would not have any restrictions imposed on their movements. However, Threadneedle Street and Queen Victoria Street would become pedestrian priority streets and cyclists would be permitted access at all times. Princes Street would only permit access to buses, cyclists, emergency vehicles and servicing vehicles.

3.12 Modelling has looked at the following six key cycling routes:

- King William Street northbound
- Princes Street southbound
- Poultry eastbound
- Cornhill westbound
- Queen Victoria Street eastbound
- Threadneedle westbound

3.13 The cycling journey time changes in both AM and PM peak on these routes is negligible, with journey times affected by no more than 1 minute.

#### **Buses**

3.14 Buses would be restricted from using both Threadneedle Street and Queen Victoria Street, enforced through a modal filter. Buses would continue to have access to all other arms of the junction. These restrictions would impact c.4.6k passengers per day<sup>10</sup>. Following Lombard Street/King William Street, Threadneedle has the highest volume of in-service TfL buses (305) followed by Princes Street (196) and Queen Victoria (142) between 5:00-10:00 and 16:00-21:00. This scheme expected to displace or impact approximately 4,600 bus users daily.

3.15 These changes would require some alterations to bus routes 8, 11, 26 and 133 (plus night routes N242, N11, N26, N21, N550, N551 and N133) – as well as associated bus stops on these routes. These changes can be seen below. It should be noted that TfL had planned to re-route the 133 before the pandemic, therefore the All Change at Bank scheme would only directly impact three daytime routes.

3.16 The alteration of these bus stops may lead to longer walking journeys as part of bus journeys for some users. However, as the area is dense with destinations it is likely that while some journeys are made longer, others are shortened. The biggest increase in distance between existing and proposed bus stops is for the 133. With the removal of the stop on Threadneedle, the nearest relocated bus stop will be situated on Bishopsgate, approximately a 320 metre walk away (equivalent to 4 minutes at a standard pace). As noted above however, this bus route was due to be re-routed prior to the All Change at Bank scheme, therefore the scheme is not the direct cause of this increased distance.

3.17 Preliminary VISSIM modelling for the design demonstrated a high increase in journey time between Great Swan Alley and Monument Station and between Monument Station and London Wall<sup>11</sup>. In order to lessen this delay along with other bus journey delays modelled in the design, the design has been reviewed and revised to mitigate increases in bus journey times while continuing to account for improved pedestrian movement.

3.18 This review resulted in the introduction of a bus shuttle run on Princes Street. This shuttle run removes a diversion for three services (six routes in both directions) that is approximately 1km in length and passes through four to five extra junctions, considerably improving journey times versus a scenario whereby buses are forced to divert around Princes Street.

3.19 With the bus shuttle run mitigation, updated traffic modelling shows that only 4 routes (of the 24 different services) are expected to experience journey time delays greater than 2 minutes,

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<sup>10</sup> Busto analysis, Transport for London data (February 2018).

<sup>11</sup> Bank Junction Shortlist Option Assessment, Norman Rourke Pryme (August 2020).

all of which are in the AM peak. These are the 11 (northbound), the 26 (northbound), the 133 (northbound) and the 100 (northbound).

- 3.20 The 11 bus route is expected to have increases of journey times of up to 2-3 minutes in the AM peak, and up to 2 minutes in the PM peak (both directions).
- 3.21 The 26 bus route is expected to have increases in journey times of between 3-5 minutes for northbound services in the AM peak, with southbound journey times expected to increase by up to 1-2 minutes. In the PM peak, journey time increases are minimal, with between 1-2 minutes of increased journey times anticipated.
- 3.22 The 100 bus route is expected to have increases in journey times of between 2-3 minutes for northbound services in the AM peak, with southbound journey times expected to increase by 1-2 minutes. In the PM peak, journey time increases are minimal, with up to 1 minute of increased journey times anticipated in either direction.
- 3.23 The 133 bus route is expected to experience journey time reductions of up to 1 minute for southbound services in the AM peak, though an increase in journey times of between 3-5 minutes for northbound services. In the PM peak, journey times on southbound services are expected to decrease by 3-5 minutes and increase by 1-2 minutes on northbound services. However, as noted above the re-routing of this bus route had been planned in any case by TfL and is not arising as a direct consequence of the All Change at Bank scheme.
- 3.24 Journey time savings of between 3-5 minutes are also expected for southbound 21, 43 and 141 services in the AM peak. In the PM peak, journey time savings are expected for northbound services of up to 1 minute, and up to 2 minutes for southbound services.
- 3.25 As such, whilst there are expected to be some increases in bus journey times of the three directly affected daytime bus routes, the maximum increase is modelled to be 3-5 minutes, with most changes smaller than this.



Figure 3: Proposed changes to bus routes 8 and N242

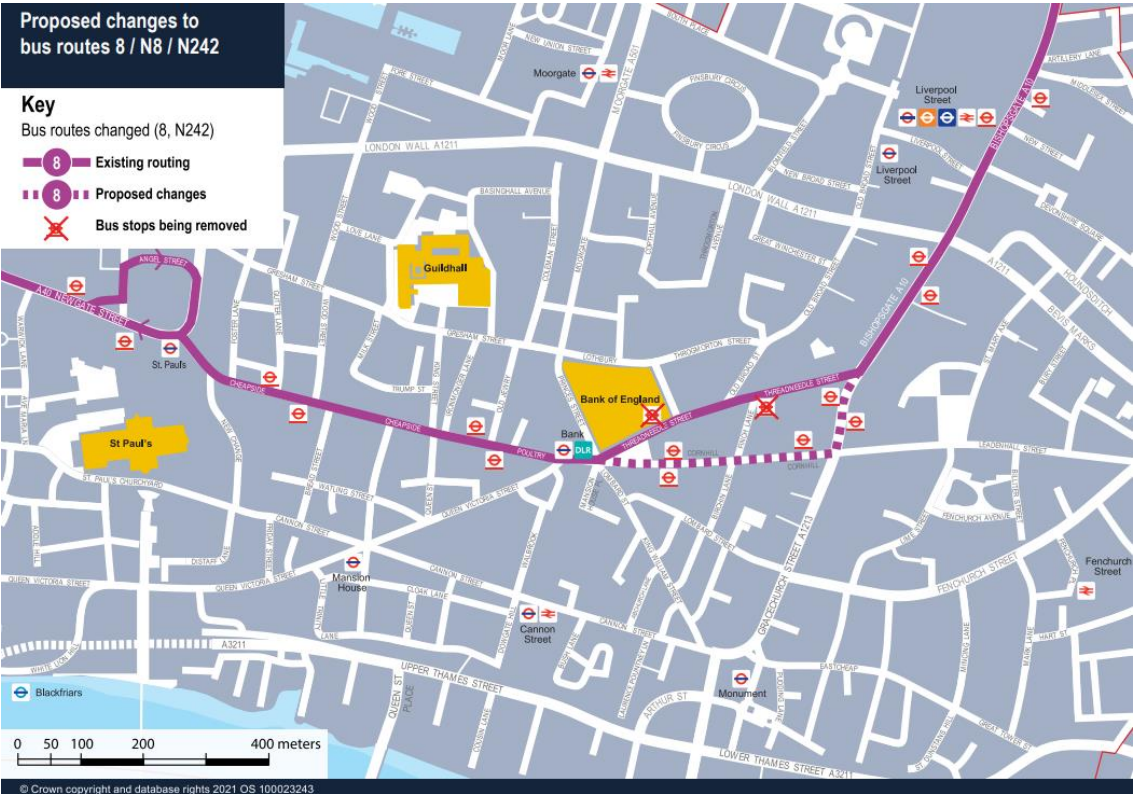
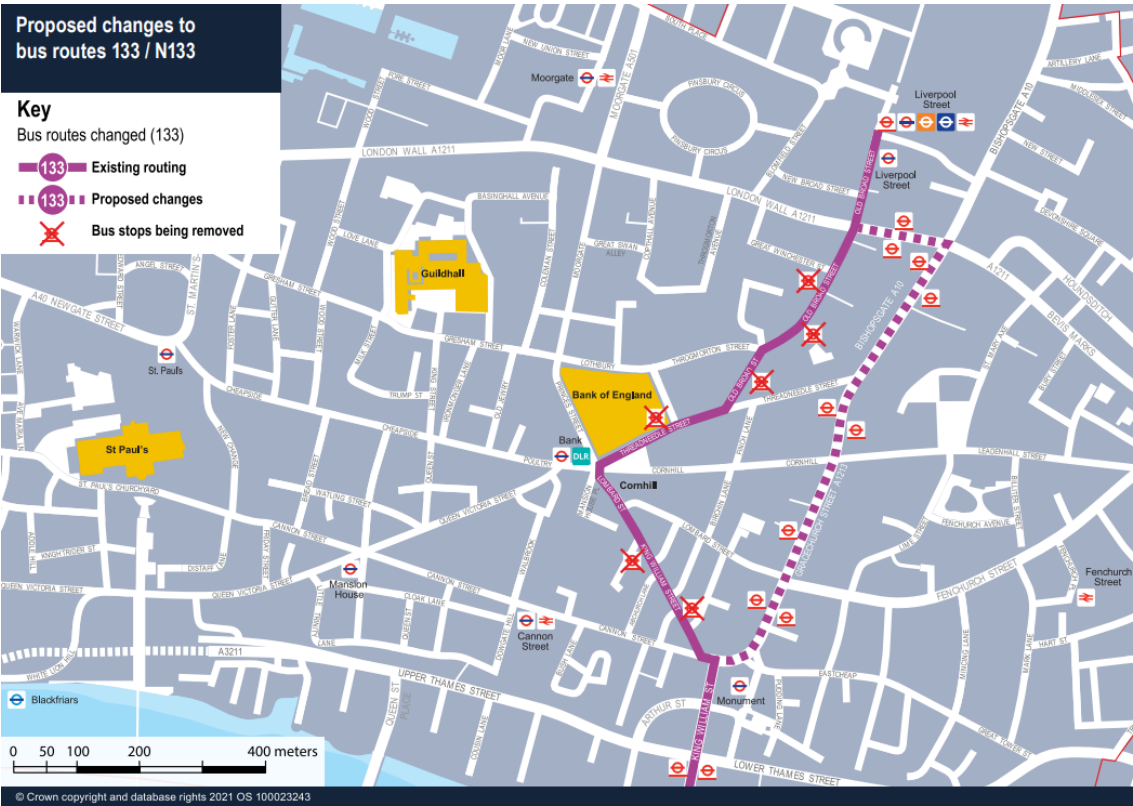
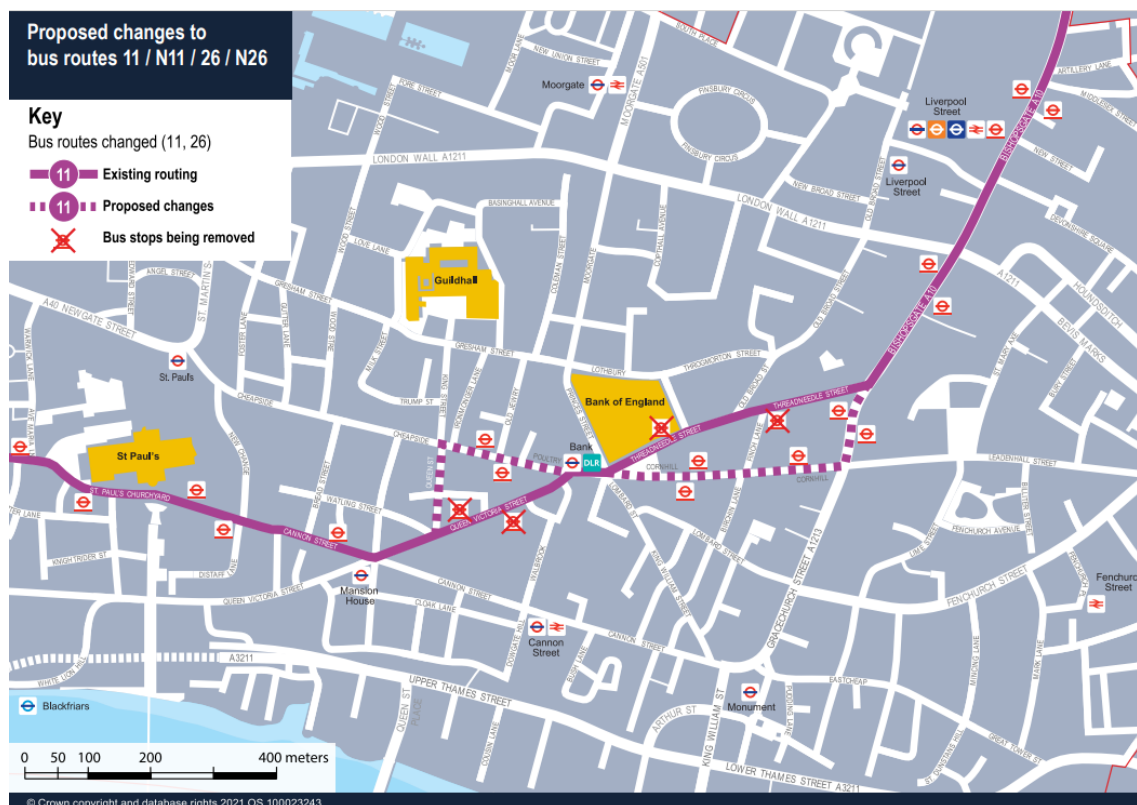


Figure 4: Proposed changes to bus route 133



**Figure 5: Proposed changes to bus routes 11 and 26**

### Taxis and general motor vehicle traffic

- 3.26 Between 5:00-10:00 and 16:00-21:00, Queen Victoria Street currently experiences the highest volume of licensed taxis entering the junction (312).
- 3.27 Motorised vehicle traffic would be restricted from using Threadneedle Street, Queen Victoria Street and Princes Street - except for servicing Cornhill. Access would remain unchanged on all other arms of the junction. Due to these restrictions, motorised vehicle drivers may choose alternative routes to divert around the Bank junction restrictions which could increase congestion and journey times elsewhere.
- 3.28 The existing taxi rank on Queen Victoria Street will moved c.50m westbound, away from the main entrance to Magistrates Court. The taxi rank at the northern end of Princes Street is to be retained as existing.
- 3.29 While taxis will not be able to drop off or collect passengers from Threadneedle St, it should be noted the entrances into the units of the Royal Exchange on this section are currently not accessible for all users. Stakeholder feedback from the Bank of England didn't highlight an issue with the additional distances to travel to the drop off/ pick locations for taxis.
- 3.30 Preliminary VISSIM modelling shows that permitting taxis through Bank junction would have a small benefit to general traffic journey times away from the junction, but a small disbenefit to bus journey times through Bank junction.
- 3.31 At this stage, modelling has looked at general traffic journey times on four key routes: Bishopsgate, Cannon Street, London Wall and New Change/Newgate Street gyratory. The design with mitigation in both the AM and PM Peak are expected to have negligible effect on journey times for general traffic.



- 3.32 It should be noted that general motor traffic access to Bank junction is currently restricted Monday-Friday, 7AM to 7PM, as part of the Bank on Safety improvements. As such, any permanent closure of the junction arms to motor traffic would only affect those currently driving through the junction outside of peak hours or on weekends where traffic flow is lower, and delays are less likely to occur.

**Blue Badge parking**

- 3.33 At present, there are single bay Blue Badge spaces either side of Cornhill, located directly outside of the Pitcher and Piano bar and restaurant. The overall provision and location of Blue Badge parking will not be amended as part this scheme.

## 4 Impacts on equalities

### Introduction

- 4.1 This chapter considers the equality impacts of the measures being proposed as part of the All Change at Bank Scheme. This assesses the design and its disproportionate impact upon equalities – both positive and negative. Recommended mitigations are also provided for any potential disproportionately negative impacts.

### Age

- 4.2 Overall, the scheme is likely to have a positive impact on reducing inequalities for this PCG – as the improvements it provides to pedestrians will improve the safety and journey experience of this mode which makes up a high mode share for trips made by older and younger Londoners.
- 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%). Therefore, mobility issues in accessing public transport are likely to be particularly relevant for those aged 60+.
- 4.4 As noted above there is a large overlap between older and disabled Londoners. Older people are also more likely to suffer from slight mobility impairments due to aging, which do not fall under the disability PCG. This can include slower movement and reaction time, and some may use mobility aids for walking. Additional space for walking is likely to be particularly beneficial for those who find it difficult to navigate narrow and crowded footways.
- 4.5 The Greater London Authority (GLA)’s ‘Equality, diversity and inclusion evidence base for London’ 2019 report<sup>13</sup> shows that 49% of 16-24-year-old Londoners cite cost of tickets as a barrier to using public transport more often, compared to less than 10% of those aged 65+. 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.
- 4.6 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% of Londoners who cycled in the past year were under the age of 45, with just 18% over 45. As the scheme will improve conditions for cycling, this likely to disproportionately benefit young people.

<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](#)

- 4.7 Additionally, TfL's "Travel in London: Understanding our diverse communities" 2019 study<sup>14</sup> suggests that younger Londoners aged 16-24 are much more likely to have experienced a recent worrying incident on public transport (40%) compared to the London average of 32% and especially compared to those aged 65+ at 13%.
- 4.8 A key objective of the Mayor of London's Healthy Streets programme is to improve the quality and safety of streets by implementing new or improved infrastructure. This includes measures such as improvements to crossings, addressing maintenance issues, providing more places for people to stop and rest. Older Londoners aged 65+ are currently less likely to be satisfied with the streets and pavements while walking according to the GLA's 'Equality, diversity and inclusion evidence base for London' 2019 report. The research identified uneven pavements, kerbs, street parking, lack of seating (e.g. benches) or accessible toilets as particular barriers to walking for older people.
- 4.9 As older people (65+) undertake the highest proportion of their trips by foot and cite addressing physical barriers as important for encouraging them to travel more, improvements to the street environment facilitate navigation, leading to a better experience with the potential for more active travel among this group. Given that there are more pedestrians than motor vehicles during peak hours, there is a strong case for reallocating road space for their comfort and benefit. Furthermore, improvements to public realm, including the provision of seating, will provide places for elderly people to rest while making their journeys.
- 4.10 People of young and old age are more vulnerable to poor air quality<sup>15</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 a reduction in emissions from private vehicle use and increases in active modes of travel will disproportionately benefit these age groups through improved air quality and increased physical activity.
- 4.11 Creating additional space for pedestrians and cyclists is likely to improve conditions for these people by creating a safer, less crowded environment. This will disproportionately benefit those aged 65+, as a third of trips made by this age group are by walking (higher than 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 the City.
- 4.12 A disproportionately high percentage of those aged 65 to 75 living in the City of London rely on driving a car or van (11%) to travel to work. As the new design will restrict general motor traffic access to some extent, it is likely that a number of journeys may be extended to avoid passing through Bank junction, leading to increased journey times and additional cost.
- 4.13 However, it should be noted that general motor traffic access to Bank junction is currently restricted Monday-Friday, 7AM to 7PM, as part of the Bank on Safety improvements. As such, any permanent closure of the junction arms to motor traffic would only affect those currently driving through the junction outside of peak hours or on weekends where traffic flow is lower, and delays are less likely to occur. Given that there are significantly more pedestrians than motor vehicles during peak hours, there is a strong case for reallocating road space for the comfort and benefit of all pedestrians.

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<sup>14</sup> [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/research-and-data/tfl-research-and-data/travel-in-london-understanding-our-diverse-communities-2019)

<sup>15</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)

- 4.14 It should be noted that the proportion of trips made by the 65+ age group by walking or public transport far outweighs the proportion using private cars. Improvements for pedestrians will also benefit both older and younger people who use public transport, as they are likely to walk to/from the nearest public transport stop.

## Disability

- 4.15 This scheme is aimed at improving conditions for all pedestrians and cyclists, therefore this will benefit those with disabilities who use the street, particularly those with mobility impairments that require mobility aids, such as wheelchairs and walking canes, as more space will be provided. The introduction of pedestrian priority streets with access closed to motor traffic will create significantly more space for pedestrians and reduce crowding around the junction.
- 4.16 As part of the design and public consultation and accessibility engagement period for the scheme, the City of London worked alongside Transport for All (TfA). TfA are the only pan-impairment disabled-led group that strives to increase access to transport across the UK.
- 4.17 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.
- 4.18 The TfA accessibility tracker identified over 140 comments received during the accessibility sessions. Some of the main points that were raised across the workshops and responses received to TfA were:
- Consideration of the design and placement of street furniture to avoid obstructing footways
  - Careful planning and clear communications to allow safe and accessible routes around the construction site
  - Crossing points to be clearly defined and safe to use
  - Suitable solutions for delineation of cycle path and footway and use of kerbs
- 4.19 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 have been assessed through the City of London Street Accessibility Tool to help inform the detail design.
- 4.20 Focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey<sup>16</sup> shows that 65% of disabled cyclists use their bike as a mobility aid, and 64% found cycling easier than walking. Survey results also show that 31% of disabled cyclists bike 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.
- 4.21 The Royal National Institute of Blind People (RNIB) has raised concerns regarding the safety of visually impaired users in shared spaces, particularly with regard to feeling of safety and

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

inclusion. Pedestrian priority areas have the potential to increase collision risk between pedestrians and cyclists, particularly given the high flows of both users in peak periods.

- 4.22 While the introduction of seating areas and public realm improvements will provide disabled people to sit and rest, which is likely to disproportionately benefit those with physical mobility impairments, these pieces of street furniture may increase the challenges for visually impaired people to navigate their way through the area safely and conveniently.
- 4.23 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% 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.
- 4.24 Bus use for those with disabilities makes up 11% of the mode share, which is double the overall bus mode share for travel into the City of London (5.5%). As such, the delays to buses will disproportionately impact those with disabilities. The soon-to-open step-free access at Bank Station will provide another step-free public transport option within walking distance of Bank junction. While this would not directly alleviate the issue of bus delays, it will potentially open up another method of public transport that has previously been inaccessible for disabled users and could facilitate modal shift away from bus.
- 4.25 The TfL 2019 Travel in London report highlights that those who identify as disabled and those who do not have the same rate of car use as passengers. Additionally, they have slightly lower rates of use of taxi and private hire vehicles. Therefore, any impact to those with mobility requirements would not be disproportionate compared to those who do not. At this time, special vehicle access to restricted roads has not yet been decided.

### Pregnancy/Maternity

- 4.26 The majority of journeys in the City of London involve walking, either because they are completely walked or as part of a walking leg to access a public transport stop. The redesign would improve walking for all pedestrians across Bank junction by providing more space on footways and improving pedestrian crossing points. This is likely to disproportionately benefit those travelling with prams, who may find it difficult to negotiate crowded and narrow footways. It will also benefit those walking with infants or small children, enabling them to walk side-by-side more easily.
- 4.27 Reduction to through-traffic is likely to reduce conflict between different road users on the whole. This will create a safer environment, particularly for pregnant people and parents with infants and/or young children. This will also provide benefits to pedestrians travelling with prams who require additional time to navigate curbs when crossing the street.
- 4.28 There is growing evidence showing that prenatal exposure to air pollution is associated with a number of adverse outcomes in pregnancy<sup>17</sup>. Therefore, a reduction in emissions from private vehicle use and increases in active modes of travel will disproportionately benefit pregnant women.

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<sup>17</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)

- 4.29 Furthermore, improvements to public realm and the introduction of benches/seating areas will disproportionately benefit this PCG, providing young mothers or pregnant women with places to sit and rest. The design of street furniture and bollards should however be designed in a way that avoids pinch points, as people with prams/buggies may find it uncomfortable or even difficult to navigate through the space.

## Race

- 4.30 The majority of journeys in the City of London involve walking, either because they are completely walked or as part of a walking leg to access a public transport stop. This design would improve walking for all pedestrians across Bank junction by providing more space on footways, and reallocating road space for pedestrian usage. Improvements for pedestrians will directly benefit those groups who are more likely to use public transport, as they are likely to walk to/from the nearest public transport stop.
- 4.31 Improvements to cycle safety are likely to disproportionately benefit Mixed or Multiple Ethnic Groups. It will also encourage more cycling by ethnic groups that are currently less likely to cycle through increasing the safety of cyclists with motor traffic reduction and reducing the amount of turning vehicles.
- 4.32 TfL data for Greater London shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65% compared with 56% 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%.<sup>18</sup> BAME groups would therefore be disproportionately negatively affected by any increases in bus journey times.
- 4.33 The cost of transport is a particular barrier to increased public transport use amongst BAME Londoners with 60% of BAME Londoners saying costs is a barrier compared to 38% of white Londoners.<sup>19</sup> Therefore, schemes 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.

## Summary

- 4.34 A summary of the impact on each PCG, and recommended mitigating actions are presented within Table 4-1 (overleaf).

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<sup>18</sup> <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>

<sup>19</sup> GLA Intelligence – Equality, Diversity and Inclusion Evidence Base for London

Table 4-1: Summary of impact and mitigation actions

PCG	Impact on equalities	Mitigation actions
Age	<ul style="list-style-type: none"> <li>The pedestrian priority streets on Threadneedle Street and Queen Victoria Street will greatly increase the amount of space usable by pedestrians. As such, improvements for pedestrians will disproportionately benefit those aged 65+.</li> <li>The restrictions on Queen Victoria Street and Threadneedle Street will require some bus stop relocations. This could disproportionately negatively impact those of older age who rely on mobility aids if they are now required to walk further than previously required. However, the new location of bus stops may also disproportionately benefit those who are now closer to their destination and are required to walk shorter distances. Without detailed information on the final origins and destinations of bus passengers, it is not possible to quantify whether positive impacts will outweigh negative impacts (or vice-versa).</li> <li>This review resulted in the introduction of a bus shuttle run on Princes Street. This shuttle run removes a diversion for three services (six routes in both directions) that is approximately 1km in length and passes through four to five extra junctions, dramatically improving journey times versus a scenario whereby buses are forced to divert around Princes Street.</li> <li>Those with aged, related mobility disabilities who rely on taxis may have to travel further to their final destination or to a taxi rank than previously required. However, the proposed relocation of the taxi rank in Queen Victoria Street will remove the need to cross Bucklersbury for those using the accessible entrance to Bank underground located on Walbrook.</li> <li>While taxis will not be able to drop off or collect passengers from Threadneedle St, it should be noted the entrances into the units of the Royal Exchange on this section are currently not accessible for all users. Stakeholder feedback from the Bank of England didn't highlight an issue with the additional distances to travel to the drop off/ pick locations for taxis.</li> <li>The inclusion of additional benches and resting areas as part of widened pavements will disproportionately benefit the elderly who are more likely to require resting points when making journeys.</li> <li>Improvements to the cycling infrastructure such as restricting motor vehicle access on Threadneedle Street may disproportionately benefit younger people who are most likely to cycle.</li> <li>Overall, the design is likely to have a positive impact on reducing inequalities for this PCG.</li> </ul>	<ul style="list-style-type: none"> <li>It is recommended that the City works monitors the performance of the cycle link on Threadneedle Street, with particular regard paid to how elderly users use and perceive this space.</li> <li>Ensure that street furniture is not located on desire lines so that those with visual impairments are not restricted in their movements. Ensure that the design of measures is legible and navigable for those with sensory impairments, for example through the use of appropriate visual, audible and tactile cues.</li> <li>Ensure that any relocated bus stops, taxi ranks or pick up/drop off designated areas are designed with standard kerbs for step-free access from bus and for taxi/car access ramps to function properly.</li> <li>Work in collaboration with TfL Buses to identify opportunities elsewhere on the network to improve bus priority in order to offset bus journey time increases.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>The restriction of all motor traffic on Threadneedle Street and Queen Victoria Street is likely to create a safer environment to cycle, with fewer motor vehicles to interact with and a reduction in the percentage of turning vehicles. As such, this is likely to benefit all cyclists, and could potentially encourage people with disabilities to try cycling, if their disability permits.</li> <li>The restrictions on Queen Victoria Street and Threadneedle Street will require some bus stop relocations. This could disproportionately negatively people who rely on mobility aids if they are now required to walk further than previously required. However, the new location of bus stops may also disproportionately benefit those who are now closer to their destination and are required to walk shorter distances. Without detailed information on the final origins and destinations of bus passengers, it is not possible to quantify whether positive impacts will outweigh negative impacts (or vice-versa).</li> <li>The ability of taxis and minicabs to drop-off and pick-up passengers will be reduced as access will not be permitted on Threadneedle Street, or through Queen Victoria Street or Princes Street. In addition, the existing taxi rank on Queen Victoria Street will moved c.50m westbound, away from the main entrance to Magistrates Court. Therefore, those with mobility disabilities who rely on taxis may have to travel further to their final destination or to a taxi rank than previously required. Taxi journey times may increase due to more indirect routing, though based on modelling, this is expected to be negligible. However, the proposed relocation of the taxi rank in Queen Victoria Street will remove the need to cross Bucklersbury for those using the accessible entrance to Bank underground located on Walbrook.</li> <li>While taxis will not be able to drop off or collect passengers from Threadneedle St, it should be noted the entrances into the units of the Royal Exchange on this section are currently not accessible for all users. Stakeholder feedback from the Bank of England didn't highlight an issue with the additional distances to travel to the drop off/ pick locations for taxis.</li> <li>The main points raised within Transport for All workshops included the need for careful planning and clear communications to allow safe and accessible routes around the construction site, ensuring that crossing points are clearly defined and safe to use, ensuring that suitable solutions are made for the delineation of cycle path and footway on Threadneedle Street, and ensuring that the use of kerbs not make the design inaccessible or difficult to navigate. Addressing each of these will be key to ensuring that the scheme does not disproportionately negatively impact disabled people.</li> <li>Overall, this design is likely to have a positive impact on reducing inequalities for this PCG. The design provides pedestrian priority areas which will benefit all pedestrians, particularly those with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>It is recommended that the City works monitors the performance of the cycle link on Threadneedle Street, with particular regard paid to how disabled users use and perceive this space.</li> <li>It also recommended that the performance of wayfinding signage, design of crossings, kerbs, surfacing and street furniture/bollards are monitored to ensure that they are not disproportionately negatively impacted disabled people.</li> <li>Inaccessible infrastructure is a primary barrier preventing Londoner's with disabilities from cycling. It is therefore important to ensure cycling infrastructure is suitable for all bicycle types – with adequate widths and lack of obstructions to allow for specialised cycles.</li> <li>Ensure that street furniture is not located on desire lines so that those with visual impairments are not restricted in their movements. Ensure that the design of measures is legible and navigable for those with sensory impairments, for example through the use of appropriate visual, audible and tactile cues, for example tactile paving or audible pedestrian traffic signals at appropriate locations.</li> <li>Ensure that any relocated bus stops, taxi ranks or pick up/drop off designated areas are designed with standard kerbs for step-free access from bus and for taxi/car access ramps to function properly.</li> <li>Ensure that access points for modal filtering are accessible to all users, including those with visual or mobility impairments and parents with prams.</li> <li>Work in collaboration with TfL Buses to identify opportunities elsewhere on the network to improve bus priority in order to offset bus journey time increases.</li> </ul>



Pregnancy/ Maternity	<ul style="list-style-type: none"> <li>Due to the restrictions on taxis being unable to pick-up or drop-off passengers on Threadneedle Street, pregnant people or those with prams may who rely on taxis for mobility will have to walk longer distances and cross over additional roads to reach their destination, or a designated pick-up area.</li> <li>Seating will disproportionately benefit pregnant women or young mothers who are likely to require more frequent rests as part of their journeys.</li> <li>Overall, the scheme is likely to have a positive impact on reducing inequalities for this PCG. Improvements to footway widths, pedestrian crossings, public realm and air quality will benefit those travelling with prams or young children.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that any additional space created for pedestrians is accessible to all users, including parents with prams, for example by ensuring that new space is flush with existing footways, or alternatively that dropped kerbs or ramps are provided. Street furniture/bollards should also be designed (and monitored) to ensure that they are not creating any pinch points or making travel through the area more difficult for people with prams/buggies.</li> <li>Ensure that any relocated bus stops, taxi ranks or pick up/drop off designated areas are designed with standard kerbs for step-free access from bus and for taxi/car access ramps to function properly. Consideration should also be given to proximity to key destinations to minimise walking distances.</li> <li>Ensure that access points for modal filtering are accessible to all users, including those with visual or mobility impairments and parents with prams.</li> </ul>
Race	<ul style="list-style-type: none"> <li>This review resulted in the introduction of a bus shuttle run on Princes Street. This shuttle run removes a diversion for three services (six routes in both directions) that is approximately 1km in length and passes through four to five extra junctions, dramatically improving journey times versus a scenario whereby buses are forced to divert around Princes Street.</li> <li>The restrictions on Queen Victoria Street and Threadneedle Street will require some bus stop relocations. This could disproportionately negatively impact those groups who use the bus more often than others, as they are now required to walk further than previously required. However, the new location of bus stops may also disproportionately benefit those who are now closer to their destination and are required to walk shorter distances. Without detailed information on the final origins and destinations of bus passengers, it is not possible to quantify whether positive impacts will outweigh negative impacts (or vice-versa).</li> <li>While it is noted that this PCG is more likely to use public transport – which will be affected by the relocation of bus routes – this PCG will also benefit from pedestrian improvements at the start and end of journeys which will most likely be made on foot.</li> <li>BAME Londoners are more likely to report cost as a barrier to transport. This scheme is therefore likely to disproportionately benefit this PCG through the improvement to low-cost modes of transport – walking and cycling.</li> <li>Overall, the scheme is expected to have a positive impact on reducing inequalities for this PCG. The design provides pedestrian priority areas which will benefit those travelling by foot or cycle.</li> </ul>	<ul style="list-style-type: none"> <li>Work in collaboration with TfL Buses to identify opportunities elsewhere on the network to improve bus priority in order to offset bus journey time increases.</li> </ul>



## 5 Conclusions

- 5.1 This EqIA has assessed the impact of the All Change at Bank design in order to highlight impacts that may positively or negatively affect certain PCGs and any mitigation recommendations to help inform its successful implementation. Where negative impacts have been identified, recommendations have been provided to mitigate these and will be used to help inform the more detailed feasibility designs and to assist with decision making.
- 5.2 The All Change at Bank scheme focuses on improving pedestrian safety, air quality, and pedestrian experience by restricting motor traffic on two to three arms at Bank junction and implementing pedestrian/cyclist priority areas. This scheme will not only benefit those making trips entirely on foot but will also benefit the large share of trips made by public transport, given the likely need to access public transport stops by walking.
- 5.3 The Bank Station Capacity Upgrade project focuses on increasing station capacity to enable movement of 40% more passengers, making the Bank on Safety project even more pertinent to provide safe and pleasant pedestrian priority areas around Bank junction. This will disproportionately benefit those groups who are more reliant on walking, such as those as 65+, as well as those who may find narrow and cluttered footways particularly difficult to negotiate, such as disabled people with mobility impairments or people walking with prams or with young children.
- 5.4 Overall, the number of people who will benefit from the changes is likely to greatly outweigh those under certain PCGs who may be negatively impacted. The improvements to pedestrian safety are expected to benefit all of the PCGs – as all are most likely to make trips as pedestrians in the subject area.
- 5.5 The primary cause of negative impact upon PCGs is due to the alteration of bus routes, and inaccessibility to be picked-up or dropped-off by motor vehicles on Threadneedle Street or Queen Victoria Street in the same locations as was previously possible. While taxis will not be able to drop off or collect passengers from Threadneedle St, it should be noted the entrances into the units of the Royal Exchange on this section are currently not accessible for all users. Stakeholder feedback from the Bank of England didn't highlight an issue with the additional distances to travel to the drop off/ pick locations for taxis.
- 5.6 Engagement facilitated by Transport for All also revealed a number of key concerns from disabled people, including the need for careful planning and clear communications to allow safe and accessible routes (particularly during construction). Furthermore, they recommended that solutions are made for the delineation of the cycle path and footway on Threadneedle Street and ensuring that the use of kerbs not make the design inaccessible or difficult to navigate. Addressing each of these will be key to ensuring that the scheme does not disproportionately negatively impact disabled people.
- 5.7 Due to the limited space available at Bank junction, designing a scheme that perfectly satisfies the specific needs of every stakeholder would be an unachievable aim. As such, the All Change

at Bank scheme has been designed in a way which finely balances the needs of all, while taking into account the specific needs of each PCG. It is recommended that ongoing collaboration with stakeholders takes place to ensure that the scheme can be implemented in way in which maximises benefits and minimises negative impacts on PCGs.

## Control Information

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**Version control/issue number**

1.0 – Draft for comment  
2.0 – Revised based on client comments  
3.0 – Final

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**Date**

29<sup>th</sup> September 2021  
9<sup>th</sup> November 2021  
22<sup>nd</sup> November 2021



## Appendix 7: All Change at Bank and links to relevant strategy and policies.

### Corporate Plan 2018 - 2023

Table 1. Links to the Corporate Plan

Bank Junction Improvements Project Objectives	Corporate Plan Aim	Corporate Plan Outcome	Corporate Plan High-level activity	How
<b>A</b> - To continue to reduce casualties	Contribute to a flourishing society	<b>1</b> – People are safe and feel safe	<b>C</b> – Protect consumers and users of building, streets and public spaces.	Simplifying the junction layout,
<b>B</b> - To reduce pedestrian crowding levels	Shape outstanding environments	<b>9</b> – We are digitally and physically well-connected and responsive	<b>D</b> – Improve the experience of arriving in and moving through our spaces.	Increasing footway widths and prioritising pedestrian movement
<b>C</b> - To improve air quality	Shape outstanding environments	<b>11</b> – We have clean air, land and water and a thriving and sustainable natural environment	<b>A</b> – Provide a clean environment and drive down the negative effects of our own activities.	Reduced number of vehicles by reducing the number of 'open' arms and creating new wide pedestrian spaces
<b>D</b> - To improve the perception of place as a place to spend time in rather than to pass through.	Shape outstanding environments	<b>12</b> – Our spaces are secure, resilient and well maintained	<b>A</b> – Maintain our buildings, streets and public spaces to high standards.	Improved public realm including greening, seating and quieter environment in a historic location.

## Climate Action Strategy 2020 - 2027

City Transportation and Public Realm projects will primarily support the Climate Action Strategy, directly or indirectly, through reducing air pollution. The Climate Action Strategy refers to the action of 'reducing air pollution through implementing our ambitious air quality and transport strategies'. How 'All Change at Bank' aligns and helps to deliver the City's Transport Strategy and Air Quality Strategy is set out in Table 3 and 4 respectively.

Other actions that the 'All Change at Bank' project will support are shown in Table 2 below.

Table 2. Links to the Climate Action Strategy

Climate Action Strategy Aims	2020 -2027 Actions	How
Support the achievement of net zero	Embed circular economy principles into our capital projects and reduce carbon intensity by using life cycle carbon and cost assessment techniques and design specifications	Reuse of yorkstone paving slabs wherever possible. The concrete paving slabs from the interim footway can either be reused elsewhere or they can be compacted to create type 1 material.
Build climate resilience	Make the Square Mile public realm more climate change ready through adding in more green spaces, urban greening, flood resistant road surfaces, adaptable planting regimes and heat resistant materials	Introducing planting and greenery Investigating if there is an opportunity for a SUDS in an inground planting bed
	Ensure that we continue to protect the residents, critical assets, infrastructure and heritage of the Square Mile	Improving the public realm in an area with buildings of significant historical and architectural importance. The design will protect and enhance the Bank setting
Champion sustainable growth	Reduce pollution and increase the resilience of the Square Mile Reduce air pollution through implementing our ambitious air quality and transport strategies	Alignment to Transport Strategy, see Table 3 Alignment to Air Quality Strategy, see Table 4
	Enhance greening and biodiversity across our public realm and open spaces	More greenery and planting will be incorporated into the design

## Transport Strategy 2019 – 2044

Bank junction and the streets within scope of the 'All Change at Bank' project are identified within Proposal 2 of the Transport Strategy as a key walking route where improvements are needed. How the project will support the delivery the Transport Strategy outcomes and proposals is set out in Table 3 below.

Table 3 Links to Transport Strategy

Bank Junction Improvements Project Objectives	Transport Strategy Outcome	Transport Strategy Proposal	How
<b>A</b> - To continue to reduce casualties	People using our streets and public spaces are safe and feel safe	<b>Proposal 20:</b> Apply the safe system approach and the principles of road danger reduction to deliver vision zero.	Redesigning the junction to a more simplified layout to reduce the likelihood and severity of collisions
		<b>Proposal 22:</b> Ensure on street security measures are proportionate and enhance the experience of spending time on our streets	Including appropriate and proportionate on-street security measures into the design
<b>B</b> - To reduce pedestrian crowding levels	The Square Mile's streets are great places to walk and spend time	<b>Proposal 2:</b> Put the needs of people walking first when designing and managing our streets	Implementing pedestrian priority streets  Widening pavements, increasing crossing widths  Key walking routes through Bank junction  decreasing crossing distances
<b>C</b> - To improve air quality	Street space is used more efficiently and effectively  <i>which directly helps to support</i>	<b>Proposal 11:</b> Take a proactive approach to reducing motor traffic.	Introducing access restrictions and other measures to reduce through traffic in line with City of London street hierarchy  Reduced number of vehicles by reducing the number of 'open' arms

	The Square Mile's air and streets are cleaner and quieter	<b>Proposal 12:</b> Design and manage the street network in accordance with the City of London Street Hierarchy	designing Bank junction and approaching arms into Local Access streets
		<b>Proposals 13:</b> Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time in	Timed restrictions to support pedestrian priority
<b>D</b> - To improve the perception of place as a place to spend time in rather than to pass through.	The Square Mile's streets are great places to walk and spend time	<b>Proposal 7:</b> Provide more public space and deliver world-class public realm	Creating new public spaces by reallocating carriageway  Improving the public realm in an area where there are buildings and structures of significant importance. Protecting and enhancing the setting
		<b>Proposal 8:</b> Incorporate more greenery into the City's streets and spaces	Incorporating greenery and planting into the public realm design

## Air Quality Strategy 2019 – 2024

Table 4. Links to Air Quality Strategy

	Action	How
Reducing Emissions from Road Transport	<b>29</b> - Ensure that Healthy Street Plans have air quality improvement targets and that the air quality impact of major transport and public realm schemes are measured.	The project will be assessed for local air quality improvements
	<b>31</b> - Implement a wide range of action through the City Corporation Transport Strategy to reduce the exposure of pedestrians to transport generated air pollution in the Square Mile	See Table 3 for alignment of Transport Strategy
	<b>35</b> - Implement a range of actions through the City Corporation Transport Strategy and City Local Plan to support and encourage cycling.	Encouraging a modal shift away from motorised transport by improving the experience for cycles
	<b>38</b> - Ensure that improving air quality and reducing exposure is an integral part of all major transport and public realm schemes and that all schemes incorporate greening where possible.	Reducing the level of exposure by reducing the number of operational arms, providing more



		space further away from the carriageway. Monitoring air quality improvement Incorporating greenery and planting
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<b>Committees:</b> Corporate Projects Board Operational Property and Projects Sub-Committee Streets and Walkways Sub-Committee	<b>Dates:</b>  (Urgency)  30 <sup>th</sup> May 2022  31 <sup>st</sup> May 2022
<b>Subject:</b> Leadenhall Street traffic management– Eastern City Cluster  <b>Unique Project Identifier:</b> 12295	<b>Gateway 2</b> <b>Regular</b> <b>Issue Report</b>
<b>Report of:</b> Executive Director Environment <b>Report Author:</b> Daniel Laybourn – City Transportation	<b>For Decision</b>
<h1>PUBLIC</h1>	

<b>1. Status update</b>	<p><b>Project Description:</b></p> <p>This report provides an update on the delivery of traffic management changes to Leadenhall Street that are to deliver the aspirations of the adopted City Cluster vision, and the outcomes of the Transport Strategy and Climate Action Strategies. The project will address impacts on the street network arising from new developments in the Cluster by providing more space for people walking and cycling.</p> <p>A delegated report was approved in February 2022 by the Chairman and Deputy Chairman. This approval was to progress an outline design for Leadenhall Street based on the transformational concept plan included in the City Cluster Vision.</p> <p>This report requests that the project is refocused from the delivery of an experimental traffic order to developing the design for Leadenhall Street. In the short term there is a proposal to mitigate the risk of the potential impacts of Transport for London's (TfL) experimental traffic restriction on Bishopsgate being amended or removed by progressing some of the design elements for this as set out in this report.</p> <p><b>RAG Status:</b> Amber (no change from previous)</p> <p><b>Risk Status:</b> Medium (no change from previous)</p> <p><b>Total Estimated Cost of Project (excluding risk):</b> £480-£550k (no change since last report to committee)</p> <p><b>Funding Source:</b> S106 (already approved as part of the Eastern City Cluster Programme) and ReVeAL Air Quality Funding. Details can be found in <b>Appendix 2</b>.</p>
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	<p><b>Spend to Date:</b> £38,187 as of 18<sup>th</sup> March 2022</p> <p><b>Costed Risk Provision Utilised:</b> None. A Costed Risk Provision (“CRP”) of £57,000 is being requested as part of this report. The Costed risk register can be found in <b>Appendix 3</b>.</p> <p><b>Slippage:</b> Should the requested decisions in this report be approved, delivery of substantive on-street changes will have slipped from Summer 2023 to at least Summer 2024 due to the requested refocusing of the project.</p>
<p><b>2. Requested decisions</b></p>	<p><b>Next Gateway:</b> TBC. The next report will be submitted in Summer 2023 following the results of a Capital Funding Bid.</p> <p><b>Requested Decisions:</b></p> <ol style="list-style-type: none"> <li>1. Note and approve the contents of this report;</li> <li>2. Note and agree that this project’s original Gateway 1/2 proposals for Leadenhall Street will not be progressed at this time;</li> <li>3. Approve a change in project title to ‘Leadenhall Street Improvements – City Cluster Vision Programme’ to better reflect the approved scope of work;</li> <li>4. Approve the amendment of the previously agreed budget (no change in the approved overall amount) detailed in <b>Appendix 2, Table 2</b>;</li> <li>5. Approve the updated funding strategy set out <b>Appendix 2, Table 3</b>;</li> <li>6. Approve a Costed Risk Provision (CRP) of £57,000 detailed in <b>Appendix 3</b> (to be drawn down via delegation to Chief Officer);</li> <li>7. Note that the requested CRP includes provision for the implementation of an experimental timed point closure on Leadenhall Street that can be seen in <b>Appendix 4</b> should this be required (subject to recommendation 8).</li> <li>8. By virtue of the promotion of experimental timed point closure proposal being placed within the risk register that authority to implement this is delegated to the Executive Director Environment subject to their prior consideration of the statutory consultation responses, TfLs TMAN process and the Equalities Impact Assessment (and to them being satisfied, following such consideration, that implementation should proceed)</li> <li>9. Note that the next report to committee is planned for Q2 2023 when funding to progress the transformational scheme for Leadenhall Street may be in place.</li> </ol> <p><b><u>Project Sub Committee (or equivalent) Only</u></b></p> <ol style="list-style-type: none"> <li>10. Agree that the Director of City Operations, in consultation with the Chairman of the Project Sub Committee and Director Environment as necessary, is to decide whether any project issues or decisions that falls within the remit of paragraph 45 of the ‘City of London Project Procedure – Oct 2018’ (Changes to projects: General), as prescribed in <b>Appendix 5</b> of this report, is to be delegated to Chief Officer or escalated to committee(s).</li> </ol>

### 3. Budget

Officers are requesting to amend the previously agreed ReVeAL and Section 106 funding strategy and rearrange the budget to accommodate a CRP. The details of these requests, including the latest spend to date, can be found in **Appendix 2**. The £218,000 budget previously approved at Gateway 2 is sufficient to cover the outline design work recently approved under delegation and further work detailed in this report.

Should the requested decisions be approved, there will be no trial hole works undertaken during this stage of work. This is because we are no longer proposing footway widening works. The Highway Engineers are proposing a less expensive methodology that better reflects the information required at this stage of design compared to our usual detailed methodology for highways surveys. It is on this basis that the project's 'Trial Works' and 'Fees' budgets can be reduced, and the funds reallocated to the requested CRP as shown in the table below.

Table 2: Budget Adjustment Required			
Description	Approved Budget (£)	Adjustment Required (£)	Revised Budget (£)
Env Servs Staff Costs	12,000	-	12,000
Legal Staff Costs	3,000	-	3,000
P&T Staff Costs	65,000	-	65,000
P&T Fees	133,000	(52,000)	81,000
Trial Works	5,000	(5,000)	-
Costed Risk Provision	-	57,000	57,000
<b>TOTAL</b>	<b>218,000</b>	<b>-</b>	<b>218,000</b>

### 4. Issue description

1. As part of the consultation on the City Cluster Vision, and more recently from occupiers, feedback had been that walking and cycling comfort levels were low and it was proposed that reducing the traffic levels on the street would improve this. Both walking and cycling are key components in the City's Transport and Climate Action Strategies.
2. In July 2021, Committees approved the project's Gateway 1/2 report. This included assessing whether the temporary point closure on Leadenhall Street, installed as part of the City's Covid-19 on-street response, should be continued as an experimental traffic order. This temporary traffic order restricted through traffic to buses and cycles only as a signed only restriction without any enforcement. The reinstatement of this as experiment was proposed so it could be monitored during the post-pandemic return to the City. A Gateway 3 / 4 report was expected to be presented to members in September 2021.
3. Soon after the Gateway 1/2 July report, Transport for London (TfL) implemented a further Temporary Traffic Order (TTO) on Bishopsgate. This reaffirmed the operational restriction to through traffic to buses and cyclists only (Monday to Friday 7am to 7pm), controlled through a series of bus gates located along Bishopsgate and Gracechurch Street. This was subsequently replaced by an experimental traffic order (ETO) in January 2022.

	<ol style="list-style-type: none"> <li>4. Whilst this ETO remains in place, officers have determined that an experimental point closure to reduce traffic levels and improve walking and cycling on Leadenhall Street is unnecessary. This is due to TfL's Bishopsgate restrictions substantially reducing the amount of traffic on Leadenhall Street.</li> <li>5. Alongside this, officers are learning from the Pedestrian Priority Programme that the temporary footway extensions such as those proposed in this project's Gateway 1/2 report are challenging to achieve on streets with flat longitudinal falls. This means there's very little scope to adjust the street's current attributes (drainage, kerb heights, etc) before a full reconstruction of the carriageway is required.</li> <li>6. Officers are therefore recommending not to proceed with promoting an experimental point closure proposal on Leadenhall Street or the proposed footway extensions, as originally identified in the Gateway 1/2 report at this time. The overall aims and objectives remain unchanged from the project's original scope however, which are to improve walking and cycling service levels along Leadenhall Street.</li> <li>7. However, there is a risk that TfL could remove its Bishopsgate ETO at short notice. Should this happen, it's likely that traffic levels on Leadenhall Street would quickly increase, and the reasons for promoting the point closure proposal to help maintain the improved walking and cycling comfort levels would return.</li> <li>8. Officers are therefore recommending that to reduce this risk, a £57,000 CRP is approved. This would be for the promotion (including statutory consultation) of the experimental timed (Monday to Friday 7am to 7pm) point closure scheme if the Bishopsgate ETO is withdrawn or changed, and it is assessed that a point closure on Leadenhall Street is required. It would also allow for consideration of statutory consultation responses and, if implemented, for the monitoring of the closure and consideration of stakeholder feedback. The previous Covid-19 on-street measures closure restricted through traffic to buses, cycles and HGVs accessing local development sites during the specified times. Any future restrictions would reconsider this, reassessing what is appropriate for the street considering local access needs and other nearby on-street restrictions</li> <li>9. The requested CRP is detailed in <b>Appendix 3</b> and can be accommodated within the existing budget if the amendment to the previously agreed budget is approved. It includes provision for the implementation, consultation and monitoring of an experimental timed point closure on Leadenhall Street, just east of St Mary Axe, as well as the drafting of the associated ETO.</li> <li>10. The design of this would be like the current bus gate on Cheapside and a design is included at <b>Appendix 4</b>. It would include cycle parking which is lacking along Leadenhall Street.</li> <li>11. As it was agreed in principle at the previous gateway report and by virtue of the implementation and monitoring of experimental timed point closure being placed within the risk register, it is requested that authority to approve implementation of this is delegated to the Executive Director Environment.</li> <li>12. The powers to make the experimental orders already sits with the Executive Director. As with all experimental orders, once active, the order would be monitored, and statutory consultation for six months would be required. After this, but before the end of 18 months, it would need to be determined whether to make this a permanent intervention.</li> <li>13. Should the experimental timed point closure be promoted, any implementation would take approximately 3-4 months from when a decision is taken. This is</li> </ol>
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primarily due to the associated statutory consultation periods, consideration of responses, and determination whether to proceed following such consideration.

14. If the experimental timed point closure is implemented, an Issue report containing a consultation summary after 6 months of the experiment being in place would be brought to Members.
15. It is recommended however that the following tasks are undertaken now in case they are required at short notice, and to act as a risk mitigation exercise. The abortive cost of undertaking these should a timed point closure is low and is all part of usual tasks undertaken in project evaluation:
  - Equalities Impact Assessment and Road Safety Audit Stages 1 and 2 on the design in **Appendix 4**;
  - Discussions with TfL regarding their TMAN (Traffic Management Act Notification) process as Leadenhall Street is part of their Strategic Road Network; and
  - A monitoring strategy is drafted that accounts for public feedback, air quality, cycling and walking levels of service and bus journey times. This document will set out measures of success for the experimental scheme.
16. There is the alternative option of not progressing any work on an experimental timed point closure until the future of TfL's Bishopsgate ETO is determined. However, this is not recommended due to the low potentially abortive cost noted in the previous paragraph. Not progressing work now would also extend the time to implement by 1-2 months. Undertaking this work now will enable us to be agile if other changes outside of our control eventuate.
17. Separately to this, in consultation with the Chairman and Deputy Chairman of Streets and Walkways and Project Sub Committees the progression of an informed concept design for the Leadenhall Street corridor was recently approved under officer's delegated authority. This will enable officers to more effectively negotiate the extent of the upcoming S278 agreements along the street extent and to determine an overall cost estimate for the delivery of the Leadenhall Street transformation project.
18. The aims and objectives of the rescoped project remain the same as the experimental order was always Phase 1 of the longer-term transformation of Leadenhall Street as identified by the City Cluster Vision and contained within the overall programme for the transformation of the Eastern City Cluster. The designs being developed will help to achieve the City's Transport and Climate Action Strategies, whilst ensuring Section 278 and other projects along the street are aligned to an overall vision. This will include investigating opportunities for greening along the street.
19. This concept designs will go on to inform the City Cluster Vision Programme's bid for central funding. This is to be submitted in Autumn 2022.
20. The designs could then be updated quickly to include a permanent point closure should a decision to make a permanent order be made in the future.

<b>5. Recommended Next Steps</b>	<ol style="list-style-type: none"> <li>1. If these recommendations are approved, officers will progress the work detailed in point 4.15 of this report.</li> <li>2. Following the previous report to committee, work on the informed concept designs for Leadenhall Street has commenced with the required surveys being ordered.</li> <li>3. Officers will also continue to work with TfL to help shape their Bishopsgate scheme to minimise any potentially negative impacts on the City.</li> <li>4. The next committee report will be submitted in Q2 2023 following the outcome of the City Cluster Vision Programme's central funding bid. Any bid recommended by Policy and Resources Committee would then need to be confirmed at the Court of Common Council in March 2023. Should the bid be successful, the report will reset the scope, budget and timeframes of this project and present the latest transformative highways and public realm design for Leadenhall Street to members. It will also provide an update on the related S278 projects along Leadenhall Street.</li> </ol>
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## **Appendices**

<b>Appendix 1</b>	Project Coversheet
<b>Appendix 2</b>	Financial Information
<b>Appendix 3</b>	Risk Register
<b>Appendix 4</b>	Bus Gate design
<b>Appendix 5</b>	Paragraph 45 of the 'City of London Project Procedure – Oct 2018' (Changes to Projects: General)

## **Contact**

<b>Report Author</b>	Daniel Laybourn
<b>Email Address</b>	Daniel.laybourn@cityoflondon.gov.uk

# Project Coversheet

## [1] Ownership & Status

**UPI:** 12295

**Core Project Name:** Leadenhall Street traffic management

**Programme Affiliation:** City Cluster Vision (formally known as the Eastern City Cluster Programme) and Cycling Programme

**Project Manager:** Daniel Laybourn

### Definition of need:

Pre COVID-19 pavement crowding was an issue in many parts of the City and, without change, was forecast to increase as the City's working population increased. Pavement crowding is still expected to be an issue in the future despite the impacts of COVID-19 including safely accommodating the increase in footfall resulting from new developments, particularly in the City Cluster. This has implications for:

- Safety – as people are often forced to walk in the carriageway and are at greater risk of being involved in a collision.
- Accessibility – some disabled people will be uncomfortable and potentially excluded by too narrow or overcrowded pavements
- Emissions reduction – the Climate Action Strategy identifies pedestrian priority and improved pedestrian comfort as necessary conditions for Net Zero by 2050

The 2017 City Streets survey found that 84% of people thought the City's pavements were overcrowded, 60% thought that people walking were given too small a share of street space and 65% thought the needs of people walking were underprioritised.

Walking is the main mode of travel in the Square Mile. 90% of on-street journeys that start or finish in the Square Mile are walked, including walking to and from public transport. Walking is the most common form of transport for disabled Londoners, with 78% reporting they walk at least once a week. 65% of disabled Londoners consider the condition of pavements to be a barrier to walking more frequently.

The Climate Action Strategy identifies pedestrian priority and improved pedestrian comfort as necessary conditions for Net Zero by 2050.

The Eastern City Cluster Vision was adopted in April 2019. The vision shows two options for significant change on Leadenhall Street providing greater space for people walking and cycling and opportunities for greening. This proposal is also included in the Eastern City Cluster Programme reporting received regularly by Committees

During the COVID-19 pandemic in 2020, a number of temporary on-street interventions were implemented to enable social distancing and provide more space for people choosing to walk and cycle. A report was taken to Planning and Transportation Committee in April seeking approval to close this project and retain some of the measures as experimental schemes across a number of programmes. This pedestrian priority programme will incorporate the largest portion of the on-street changes in its first year of delivery.

**Key measures of success:**

- Whether businesses can still meet their delivery and access needs
- Journey times are not significantly impacted on surrounding streets
- Perceptions of pedestrian and cycle comfort improve

**Expected timeframe for the project delivery/ Key Milestones:**

1. People are safe and feel safe.
2. Our physical spaces have clean air, land and water and support a thriving and sustainable natural environment.
3. Our spaces are digitally and physically well-connected and responsive.

**Are we on track for completing the project against the expected timeframe for project delivery?** TBC. A report will follow in May 2022 detailing project slippage.

**Has this project generated public or media impact and response which the City of London has needed to manage or is managing?** No.

**[2] Finance and Costed Risk****Headline Financial, Scope and Design Changes:****‘Project Briefing & Proposal’ G1/2 report (as approved by PSC 23/7/21):**

- Total Estimated Cost (excluding risk): £480-550k
- Requested budget: £218k
- Costed Risk Against the Project: N/A
- Estimated Programme Dates:
  - **Overall programme:** July 2021 – Summer 2024
  - **Key dates:**
  - Gateway 1 /2 July 2021
  - Gateway 3/4 September/ October 2021
  - Gateway 5 (Delegated) November 2021
  - Progress Reporting Summer 2022
  - Progress Reporting/ Gateway 5 at Summer 2023 (end of potential experimental period)

*Scope/Design Change and Impact:* Project initiation that requested authority to review available data, undertake stakeholder engagement, progress design options, develop a monitoring strategy and proceed with third party approvals.

**G2 Issue report (Approved via delegated authority in February 2022)**

- Total Estimated Cost (excluding risk): £480-550k
- Resources to reach next Gateway (excluding risk): no additional budget requested.
- Spend to date: £14,339 (as of 25/2/22)
- Costed Risk Against the Project: N/A
- CRP Requested: N/A
- CRP Drawn Down: N/A
- Estimated Programme Dates: TBC. A report will follow in May 2022 detailing project slippage.

*Scope/Design Change and Impact:* Short report requesting an update to the current Fees expenditure description (which is 'Equalities Assessments, Road Safety Audits, surveys, Traffic Modelling consultancy costs, Topo surveys and utilities investigations') to include "highway and public realm concept design work to be undertaken by third parties" to enable an outline design to be developed for Leadenhall Street based on the City Cluster Vision.

**Total anticipated on-going commitment post-delivery [£]:** None  
**Programme Affiliation [£]:** £15million (City Cluster Vision Programme)

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### Appendix 3 – Financial Information

<b>Table 1: Spend to Date - Leadenhall Street Traffic Management - ECC - 16800455</b>			
<b>Description</b>	<b>Approved Budget (£)*</b>	<b>Expenditure (£) **</b>	<b>Balance (£)</b>
Env Servs Staff Costs	12,000	-	12,000
Legal Staff Costs	3,000	-	3,000
P&T Staff Costs	65,000	38,187	26,813
P&T Fees	133,000	-	133,000
Trial Works	5,000	-	5,000
<b>TOTAL</b>	<b>218,000</b>	<b>38,187</b>	<b>179,813</b>
*Budget approved at Gateway 1/2 but not all set up in CBIS			
** includes commitments of £23,847.61			

<b>Table 2: Budget Adjustment Required</b>			
<b>Description</b>	<b>Approved Budget (£)</b>	<b>Adjustment Required (£)</b>	<b>Revised Budget (£)</b>
Env Servs Staff Costs	12,000	-	12,000
Legal Staff Costs	3,000	-	3,000
P&T Staff Costs	65,000	-	65,000
P&T Fees	133,000	(52,000)	81,000
Trial Works	5,000	(5,000)	-
Costed Risk Provision	-	57,000	57,000
<b>TOTAL</b>	<b>218,000</b>	<b>-</b>	<b>218,000</b>

<b>Table 3: Funding Strategy</b>			
<b>Funding Source</b>	<b>Current Funding Allocation (£)</b>	<b>Earmarked Funding (£)</b>	<b>Total Funding Strategy (£)</b>
ReVeAL EU Funding	22,660	-	22,660
S106 - 13/01004/FULEIA - 40 Leadenhall Street - Transportation	195,340	332,000	527,340
<b>Total Funding Drawdown</b>	<b>218,000</b>	<b>332,000</b>	<b>550,000</b>

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**City of London: Projects Procedure Corporate Risks Register**

 Project name: Leadenhall Street traffic management - Eastern City Cluster

 Unique project identifier: 12295

 Total est cost (exc risk) £480000

Corporate Risk Matrix score table

PM's overall risk rating

Medium

Avg risk pre-mitigation

3.1

Avg risk post-mitigation

1.1

Red risks (open)

0

Amber risks (open)

2

Green risks (open)

10

	Minor impact	Serious impact	Major impact	Extreme impact
Likely	4	8	16	32
Possible	3	6	12	24
Unlikely	2	4	8	16
Rare	1	2	4	8

Costed risks identified (All)

£62,000.00 13%

Costed risk as % of total estimated cost of project

Costed risk pre-mitigation (open)

£62,000.00 13%

" "

Costed risk post-mitigation (open)

£57,000.00 12%

" "

Costed Risk Provision requested

£57,000.00 12%

CRP as % of total estimated cost of project

- (1) Compliance/Regulatory
- (2) Financial
- (3) Reputation
- (4) Contractual/Partnership
- (5) H&S/Wellbeing
- (6) Safeguarding
- (7) Innovation
- (8) Technology
- (9) Environmental
- (10) Physical

Number of Open Risks	Avg Score	Costed impact	Red	Amber	Green
2	4.0	£0.00	0	1	1
1	3.0	£0.00	0	0	1
2	2.5	£0.00	0	0	2
3	2.0	£0.00	0	0	3
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
0	0.0	£0.00	0	0	0
1	3.0	£0.00	0	0	1
0	0.0	£0.00	0	0	0
3	4.0	£62,000.00	0	1	2

Issues (open)

0

Open Issues

Extreme	Major	Serious	Minor
0	0	0	0
0	0	0	0

All Issues

0

All Issues

 Cost to resolve all issues  
(on completion)

£0.00

Total CRP used to date

£0.00

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City of London: Projects Procedure Corporate Risks Register

Project Name: <div>Leadenhall Street traffic management - Eastern City Cluster</div>				PM's overall risk rating: <div>Medium</div>				CRP requested this gateway				£ 57,000		Average unmitigated risk		Open Risks								
Unique project identifier: <div>12295</div>				Total estimated cost (exec risk):				£ 480,000				Total CRP used to date		£ -		Average mitigated risk score		Closed Risks						
General risk classification												Mitigation actions								Ownership & Action				
Risk ID	Gateway	Category	Description of the Risk	Risk Impact Description	Likelihood Classification pre-mitigation	Impact Classification pre-mitigation	Risk score	Costed impact pre-mitigation (£)	Costed Risk Provision requested Y/N	Confidence in the estimation	Mitigating actions	Mitigation cost (£)	Likelihood Classification post-mitigation	Impact Classification post-mitigation	Costed impact post-mitigation (£)	Post-Mitigation risk score	CRP used to date	Use of CRP	Date raised	Named Departmental Risk Manager/ Coordinator	Risk owner (Named Officer or External Party)	Date Closed OR/ Realised & moved to issues	Comment(s)	
R1	2	(3) Reputation	Delays or vacation of worksite due to external events and/ or occurrences	Should such an event happen, a number of possibilities could occur: * Change in project scope * Change in project resources * Change in project delivery timescales * Pause to project whilst situation is assessed	Unlikely	Minor	2		N	B – Fairly Confident	* Work as a team to scenario plan at an early stage to estimate costs and impacts of high, medium and low occurrences. * Budget and programme slack to account for likely low impact events		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22- The project is in the very early stages of planning meaning that this risk is very minor. The project team will continue to assess and mitigate against such risk as part of its BAU processes.	
R2	2	(1) Compliance/Regulatory	Issues or delays in any required consents which cause delay to project delivery	If there was to be any delay in the arrival of any required consents, such as planning permissions, TMOs, Permits, discharge of conditions, heritage, TfL, etc; its likely the project may suffer from some form of unplanned delay, additional work and/ or costs.	Unlikely	Minor	2		N	B – Fairly Confident	* Map out the required consents with project team and continually monitor & update throughout the project * Schedule regular meetings with consent approvers, especially those with long lead in times or complex approval procedures.		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - No change. This scheme will require 3rd party approvals by Transport for London and potentially from adjacent boroughs. Normal BAU processes will mitigate however.	
R3	2	(1) Compliance/Regulatory	Judicial Review, which leads to project delay/ further costs	Should judicial review occur at this early stage, its certain this would have major implications on project delivery. Extra legal advice could also be required to deal with the situation.	Possible	Serious	6		N	B – Fairly Confident	* Consider legal advice. This could be the internal teams or external advice such as QCs if necessary. * Should judicial review be a distinct probability, establish a very detailed and concise project plan, programme and design log which details change and the reasons why. * Reaffirm statutory documentation requirements via internal advice. * Ensure and check that any public advertisements are in place as required (and replaced if needed)		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - No change. Although we can ensure all due processes are followed, a JR can occur during the traffic order process and will need to go through the Court process for determination. Fully compliant processes which are documented and made public may reduce the likelihood of an individual or organisation making a JR claim	
R4	2	(10) Physical	Accessibility and/ or security concerns lead to project change that in-turn results in additional resources being required to compensate.	Further changes to the project's design and scope may be required if accessibility concerns are raised.	Possible	Minor	3		N	B – Fairly Confident	* Regular reviews of designs (especially just prior to Gateways) in liaison with specialist groups and contacts * Regular meetings with associated projects and programmes		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - Accessibility will be assessed during the design phases using the new CoL accessibility tool. This is a new BAU process which will help to mitigate this risk. Also the project is working alongside the relevant security project which will help to ensure synergies are maintained.	
R5	2	(4) Contractual/Partnership	TfL buses engagement and their requirements on a project.	Further time and therefore resource may be required if planned engagement work with TfL buses didn't go as planned. Also, they may change their requirements for a project.	Possible	Minor	3		N	B – Fairly Confident	* Ensure early engagement with TfL buses in the design phase so they can consult internally * Design the scheme to minimise bus impacts or attempt to provide a benefit so TfL buses are more inclined to help fund the project.		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - BAU project discussions have already taken place with TfL buses. Its expected these discussions will be sufficient to mitigate any potential associated risks.	
R6	2	(8) Technology	Modelling issues (results and implications, issues with the delivery, buy-in, required re-runs, etc)	Modelling can play a major role in defining a project and confirming its viability. Any issues could have many different and combined outcomes where additional resource may be required to rectify. Also, further modelling may be required following consultation if design changes needed.	Possible	Minor	3		N	B – Fairly Confident	* Early engagement with TfL to identify requirements, their timescales and costs * Ensure information & data requirements for modelling are agreed and scoped out fully * Regular engagement with design and modelling consultants		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - No change. As this is an experimental traffic experiment, the requirements for modelling should be modest if required at all.	
R7	2	(2) Financial	Lack of available skilled staff resource being available which leads to delays	Additional resource may be required for a number of reasons i.e. new and unplanned requirement identified, loss of team member, etc	Possible	Minor	3		N	B – Fairly Confident	* Resource plan at least two Gateway stages forward in an effort to locate resources as early as possible * Use existing framework contracts where possible		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - The new resourcing framework is now in place to cover resource requirements should there be any issues.	
R8	2	(3) Reputation	issue(s) with external engagement and buy-in lead to additional resources being required to compensate	Further time and therefore resource may be required if planned engagement work with local external stakeholders didn't go as planned. These issues could arise from the public consultation results.	Possible	Minor	3		N	B – Fairly Confident	* Early identification and engagement with key stakeholders using the City Cluster Vision Programme Stakeholder Engagement plan and established communication routes * Consider specific working groups should it be required.		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - At this stage, this risk is thought to be low and will be tracked in partnership with the City Cluster Vision Programme which this project is a part of.	

R9	2	(4) Contractual/Partnership	Project supplier delays, productivity or resource issues impacts negatively on project delivery	Referring both to internal and external suppliers to projects, alternative arrangements which require additional resource may be required if a potential or existing supplier is unable to deliver as agreed for whatever reason.	Rare	Minor	1		N	B – Fairly Confident	* Arrange construction planning meeting with term contractor just prior to construction to ensure that resources are available (i.e. construction pack from them is received in good time)		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - A very minimal risk given the very small amount of on-site work that could occur.
R10	2	(10) Physical	Utility and utility survey issues lead to increased costs/scope of works	At the earlier stages of a project, delays could occur which result unplanned costs if utility companies don't engage as expected. Also, extra resource would be needed if further surveys are required. During construction, any issues with required utility companies could result in extra resources being required.	Possible	Minor	3		N	B – Fairly Confident	* Work with design engineers to work out an appropriate sums to cover utility delays or on-site discoveries. *Quite minor construction works required for this project so risk should be limited.		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - utility surveys are currently taking place and Leadenhall St has already been heavily surveyed in the past. Both these points lead to a low risk score at this time.
R12	2	(4) Contractual/Partnership	Third party delays impacts negatively on project delivery (time & costs)	A CoL project may require a third party to complete its work before it can proceed. Should this work be delayed in anyway, its likely to impact (time and cost-wise) on a project.	Unlikely	Minor	2		N	A – Very Confident	* Include regular meetings with the developer and local stakeholders * Include some slack in the programme to absorb low-level delays		Rare	Minor		1	n/a	n/a	20/06/21	Leah Coburn	Daniel Laybourn		5/4/22 - at this stage, this risk is low but will become more important at the subsequent stages of work. Also, its more likely than not that these risks will be monitored by their own individual projects (most likely S278) which can then feed into this project and the City Cluster Vision Programme.
R13	2	(10) Physical	Removal or amendment of Transport for London's experimental traffic restriction on Bishopsgate leads to an increase in general traffic on Leadenhall Street	Those currently walking and cycling on Leadenhall Street are seeing a benefit from the reduced levels of general traffic. If TfL's Bishopsgate ETO is removed or amended, traffic levels on Leadenhall St could increase that could result in cycling and walking comfort levels reducing. Therefore it would require the implementation of a experimental traffic restriction (a bus gate) on Leadenhall Street to maintain current cycling and walking comfort levels.	Possible	Serious	6	£62,000.00	Y - for costed impact post-mitigation	A – Very Confident	* Under approved BAU processes, undertake an Equalities Impact Assessment, Road Safety Audit Stages 1 & 2, drafting of a monitoring strategy and discussions with TfL now to enable an experimental timed point closure to proceed quicker in future if its needed.	£0.00	Possible	Serious	£57,000.00	6	£0.00	Envisaged uses of the requested CRP are (but not limited to): * On-street experimental scheme implementation * Experimental scheme monitoring and consultation * Drafting and publishing of the experimental traffic order	05/04/21	Leah Coburn	Daniel Laybourn		5/4/22 - Please see the related May 2022 Issue Report for more details.



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## **Appendix 4 - Paragraph 45 of the 'City of London Project Procedure – Oct 2018' (Changes to Projects: General)**

### **Changes to Projects: General**

45. *In cases where:*

- *the financial implications will be higher or lower than the agreed confidence range (capital or revenue expenditure or income/returns/savings);*
- *the overall programme needs to be accelerated or delayed +/- 10% of time against the last numbered Gateway report;*
- *the specification will be significantly different to that agreed, i.e. there will be a shortfall against one or more of the key objectives/ SMART targets, or the inclusion or reduction in the parameters of the project, which may include changing operational performance criteria and business benefits;*

*Officers will report to the Committee(s) or Chief Officer who approved the last Gateway report on the circumstances, the options available and a recommended course of action. For example, if circumstances change on the Light and Regular routes where Authority to start work is delegated to Chief Officer, they would need to return to Committee to progress to the next gateway.*

*If additional unallocated City Corporation resources are required (i.e. from Central resources, not local risk budgets), the approval of the Policy and Resources Committee must also be obtained as Service Committees cannot approve Central resources.*

*In such cases the Policy and Resources Committee must be advised of the impact of the proposed increase in the City's overall Programme and any agreed increase must be reported to the next meeting of the Resource Allocation Sub-Committee for appropriate adjustments to be made to the City Corporation's Programme.*

*Note that Chamberlains have prepared guidance on the preparation of Whole Life Costing (available on the corporate intranet).*

*These will not apply to the costed risk provision drawdown increases to budgets as they have already been considered and delegated [See 49]:*

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# Agenda Item 9

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<b>Committees:</b>  Corporate Projects Board Operational Property and Projects Streets and Walkways	<b>Dates:</b>  11 May 2022 30 May 2022 31 May 2022
<b>Subject:</b> 60 London Wall S278  <b>Unique Project Identifier:</b> 11982	<b>Gateway 6:</b> <b>Outcome Report</b> Regular
<b>Report of:</b> Executive Director Environment <b>Report Author:</b> Leah Coburn – City Transportation	<b>For Decision</b>
<b>PUBLIC</b>	

## Summary

<b>1. Status update</b>	<b>Project Description:</b> 60 London Wall S.278 Highway Improvements. All project costs were fully funded by the developer.  <b>RAG Status:</b> Green (Green at last report to Committee)  <b>Risk Status:</b> Low – this project is fully reimbursable (Low at last report to committee)  <b>Costed Risk Provision Utilised:</b> N/A  <b>Final Outturn Cost:</b> £374,650
<b>2. Next steps and requested decisions</b>	<b>Requested Decisions:</b>  Members of Streets and Walkways and Project Sub – Committees are asked to;

	<ul style="list-style-type: none"> <li>• Approve the content of this outcome report noting that the project was delivered to meet the developers programme and within the budget approved at G5.</li> <li>• Authorise the Chamberlain's department to return unspent S278 funds to the Developer as set out in the s278 legal agreement (subject to the verification of the final account); and</li> <li>• Agree to close the 60 London Wall project</li> </ul>
<b>3. Key conclusions</b>	<p>The improvements, as shown in <b>Appendix 1</b>, have been successfully implemented in parallel with the completion of the building as agreed with the developer.</p> <p>There were delays to the programme caused by COVID-19 lockdown. Works were postponed during summer 2020 to ensure space was available for people returning to work to maintain safe social distancing. COVID-19 caused further delays by impacting the availability of term contractor staff to carry out the works. Delays were also caused by the developer failing to hand over areas to the City's contractor as agreed which required changes to the programme of works.</p> <p>Ultimately the delays did not impact the developer as COVID-19 also impacted their occupation date. This meant that the Highways works were completed prior to occupation.</p> <p>Carriageway resurfacing works on London Wall were delayed on multiple occasions due to issues with contractor resourcing and weather. These delays did not impact the occupation of the building.</p>

## **Main Report**

### **Design & Delivery Review**

<b>4. Design into delivery</b>	The proposed design has successfully accommodated the associated new development. The City's Highways Team and the term contractor (J B Riney) worked together with the developer to re-programme works where necessary.
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<b>5. Options appraisal</b>	The project was limited in its opportunities to explore different designs due to both the standardised nature of the work and the tangible restrictions around them, such as building lines and the road network. Therefore, alternative options were not explored.
<b>6. Procurement route</b>	The design was prepared in-house by the City's highways team and the City's term contractor was used to deliver the project.
<b>7. Skills base</b>	The Project Team had the skills, knowledge and experience to manage and deliver the project.
<b>8. Stakeholders</b>	Local stakeholders, such as neighbouring buildings, were engaged throughout the processes and the project was able to deliver the highways changes to the developers satisfaction.

### **Variation Review**

<b>9. Assessment of project against key milestones</b>	<p>As detailed above, the City's construction period was delayed by the COVID-19 pandemic and resulting lockdown, which meant works were paused and then caused issues with availability of resource for J B Riney to carry out the works. Works were also delayed by the developer failing to hand over areas as agreed. As a result completion of the project was delayed from September 2020 to March 2022.</p> <p>While significant, the delay did not impact the developer's occupation of their building as COVID-19 also delayed this and the final works to resurface the carriageway did not prevent occupation.</p>
<b>10. Assessment of project against Scope</b>	<p>The cost estimate increased between G2 and G5 due to the need to undertake more substantial work to tie into building thresholds than what was anticipated. This required additional drainage works and additional construction costs of £170K which were detailed in the G5 report.</p> <p>A new dropshaft on London Wall was designed out during construction. Otherwise there were no substantial changes to the design approved at Gateway 5. This was achieved by opening a dialogue with the Developer and the statutory undertakers involved as early as possible to confirm the scope of work required.</p>
<b>11. Risks and issues</b>	The risk of the developer not handing over work areas in line with our programme was realised. This required the programme to be adjusted and increased staff costs. These increased costs were passed on to the developer. We work closely with developers on S278 projects try and capture changes to programme as soon as possible but it wasn't possible in this situation due to last minute

	changes to labour and materials due to the impact of the covid pandemic.
<b>12. Transition to BAU</b>	The project is now complete and has been passed over to the Highways Maintenance team to manage. The scheme was designed and built to the City's specifications.

### Value Review

13. Budget	<table><tr><td>Estimated Outturn Cost (G2)</td><td>£200,000-£250,000 (excluding risk):</td></tr></table>		Estimated Outturn Cost (G2)	£200,000-£250,000 (excluding risk):													
	Estimated Outturn Cost (G2)	£200,000-£250,000 (excluding risk):															
	<table><tr><td></td><td>At Authority to Start work (G5)</td><td>Final Outturn Cost</td></tr><tr><td>Fees</td><td>£29,436</td><td>£9,846</td></tr><tr><td>Staff Costs</td><td>£88,358</td><td>£77,086</td></tr><tr><td>Works</td><td>£288,003</td><td>£287,718</td></tr><tr><td>Total</td><td>£405,797</td><td>£374,650</td></tr></table>			At Authority to Start work (G5)	Final Outturn Cost	Fees	£29,436	£9,846	Staff Costs	£88,358	£77,086	Works	£288,003	£287,718	Total	£405,797	£374,650
		At Authority to Start work (G5)	Final Outturn Cost														
	Fees	£29,436	£9,846														
	Staff Costs	£88,358	£77,086														
	Works	£288,003	£287,718														
	Total	£405,797	£374,650														
	<p>The reduced spend on Fees compared to the estimate was due to the drop shaft not needing to be constructed which would have required archaeological supervision (Estimated at £10k). Costs for the topographical and radar surveys also came in under budget.</p> <p><b>Please confirm whether or not the Final Account for this project has been verified.*</b></p> <p><i>Not verified</i></p>																
14. Investment	N/A																
15. Assessment of project against SMART objectives	<p>The project achieved its objectives of;</p> <p>1. Meeting the needs of the developer and delivering works to align with their programme</p> <p>2. Meeting the requirements of the City in terms of: appearance, function and cost (funded by the developer)</p> <p>3. Providing a better pedestrian experience, measured against the ten Healthy Streets indicators.</p>																
16. Key benefits realised	<p>The key benefits have been realised;</p> <p>1. To deliver a high quality and functional highway in the vicinity of the development</p>																

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	<p>2. To mitigate the impacts of the development on the surrounding highway</p> <p>11. This project will be fully funded by the developer, including the provision of applicable commuted maintenance sums.</p>
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### **Lessons Learned and Recommendations**

<b>17. Positive reflections</b>	The project team worked well with the Developer and their contractors in difficult circumstances. Despite the impact of COVID-19 the project delivered against the key milestone of ensuring works were completed in time for the occupation of the development.
<b>18. Improvement reflections</b>	<p>The agreed site handover phasing was not kept to by the Developer's contractors. This meant the project team had to adjust the work programme on several occasions. It is worth noting that this was happening under the effects of the COVID-19 restrictions, so it was more complicated for the project team to visit site and attend meetings as they had been able to do before.</p> <p>The issues of differences between building finished floor levels and the surrounding highways levels is one that often arises on these types of projects where the works are limited to footway replacement only i.e not a full scheme including carriageway reconstruction or a complete change to the highway. Both the Planning and Highways / Public Realm teams try to ensure this is avoided through the pre application and planning process.</p>
<b>19. Sharing best practice</b>	Dissemination of information through team and project staff briefings has taken place.
<b>20. AOB</b>	N/A

### **Appendices**

<b>Appendix 1</b>	60 London Wall – Before and After Photos
<b>Appendix 2</b>	60 London Wall – Final Project Costs

### **Contact**

<b>Report Author</b>	Leah Coburn – City Transportation
<b>Email Address</b>	Leah.coburn@cityoflondon.gov.uk
<b>Telephone Number</b>	

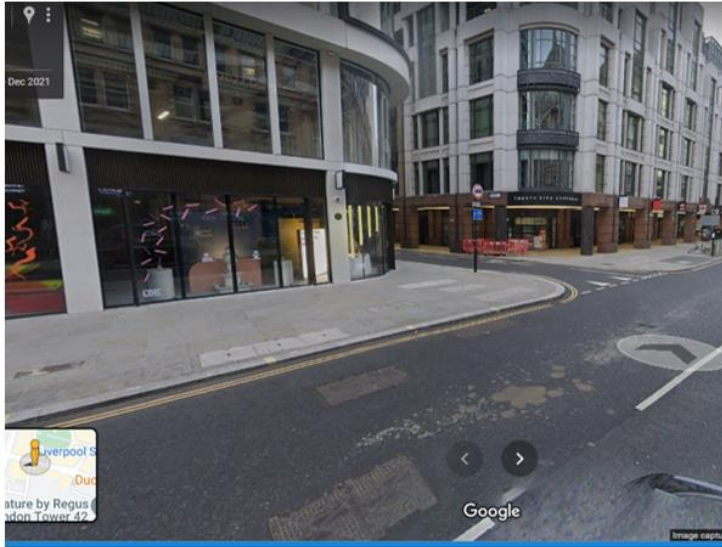
v. April 2019

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## 60 London Wall- Copthall Avenue:

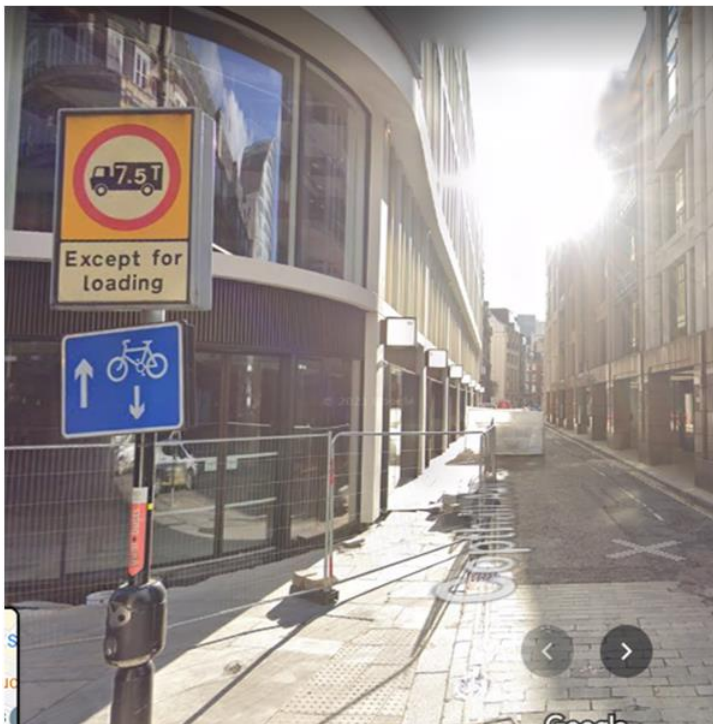
Left (Before completed works): November 2020

Right (After completed works): May 2022



South down Copthall Avenue from London Wall.

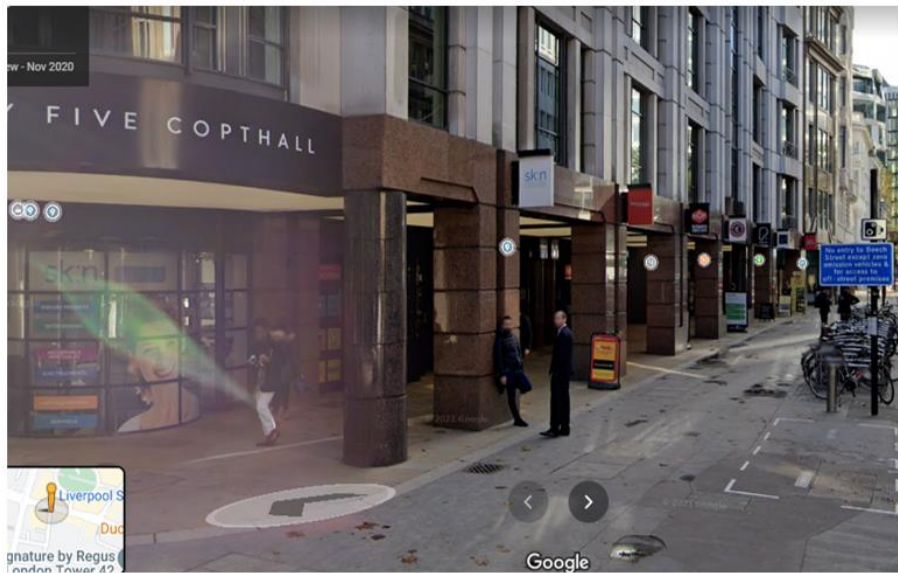
South West on London Wall facing Copthall Avenue.







South East on London Wall at Copthall Avenue



South West London Wall at Twenty Five Copthall Avenue



Core Project	Linked Project Number	Project Number	Project Name	Top Task	Sub Task	Approved Budget	Actuals - AP + Misc	GRN Actual Unmatched	Commitment	Total	Amount Unspent	
L5-60 London Wall S278	16100395	16100395	60 London Wall S278.	3A Staff Costs	Env Serv Staff Cost	22,403.00	20,246.32	0.00	0.00	20,246.32	2,156.68	
					P&T Staff Costs	5,229.00	1,030.45	0.00	0.00	1,030.45	4,198.55	
				3A Staff Costs Total			27,632.00	21,276.77	0.00	0.00	21,276.77	6,355.23
				Fees	P&T Fees	25,666.00	6,076.00	0.00	0.00	6,076.00	19,590.00	
				Fees Total			25,666.00	6,076.00	0.00	0.00	6,076.00	19,590.00
				Works	Env Servs Works	288,003.00	287,717.57	0.00	0.00	287,717.57	285.43	
				Works Total			288,003.00	287,717.57	0.00	0.00	287,717.57	285.43
		16500395	60 London Wall S278 OH.	3A Staff Costs	Env Servs Staff Cost	20,217.00	18,832.36	0.00	0.00	18,832.36	1,384.64	
					Staff Costs	4,179.00	656.16	0.00	0.00	656.16	3,522.84	
				3A Staff Costs Total			24,396.00	19,488.52	0.00	0.00	19,488.52	4,907.48
		16100395 Total					365,697.00	334,558.86	0.00	0.00	334,558.86	31,138.14
	16800395	16600395	60 London Wall S278 - OH	3A Staff Costs	Env Servs Staff Cost	7,455.00	7,455.00	0.00	0.00	7,455.00	0.00	
					Staff Costs	9,879.00	9,878.97	0.00	0.00	9,878.97	0.03	
				3A Staff Costs Total			17,334.00	17,333.97	0.00	0.00	17,333.97	0.03
		16800395	60 London Wall S278	3A Staff Costs	Env Servs Staff Cost	8,152.00	8,152.00	0.00	0.00	8,152.00	0.00	
					Legal Staff Costs	100.00	91.66	0.00	0.00	91.66	8.34	
					P&T Staff Costs	10,744.00	10,743.03	0.00	0.00	10,743.03	0.97	
				3A Staff Costs Total			18,996.00	18,986.69	0.00	0.00	18,986.69	9.31
				Fees	P&T Fees	3,770.00	3,770.00	0.00	0.00	3,770.00	0.00	
				Fees Total			3,770.00	3,770.00	0.00	0.00	3,770.00	0.00
				16800395 Total					40,100.00	40,090.66	0.00	0.00
		L5-60 London Wall S278 Total					405,797.00	374,649.52	0.00	0.00	374,649.52	31,147.48
		Grand Total					405,797.00	374,649.52	0.00	0.00	374,649.52	31,147.48

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<b>Table 1: Spend to Date - 60 London Wall S278 (SRP) - 16800395</b>			
<b>Description</b>	<b>Approved Budget (£)</b>	<b>Expenditure (£)</b>	<b>Balance (£)</b>
Env Servs Staff Costs	15,607	15,607	-
Legal Staff Costs	100	92	8
P&T Staff Costs	20,623	20,622	1
P&T Fees	3,770	3,770	-
<b>TOTAL</b>	<b>40,100</b>	<b>40,091</b>	<b>9</b>

<b>Table 2: Spend to Date - 60 London Wall S278 (CAP) - 16100395</b>			
<b>Description</b>	<b>Approved Budget (£)</b>	<b>Expenditure (£)</b>	<b>Balance (£)</b>
Env Serv Staff Costs	42,620	39,079	3,541
P&T Staff Costs	9,408	1,687	7,721
P&T Fees	25,666	6,076	19,590
Env Servs Works	288,003	287,718	285
<b>TOTAL</b>	<b>365,697</b>	<b>334,559</b>	<b>31,138</b>

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<b>Committees:</b> Open Spaces and City Gardens <i>[for information]</i> Operational Property and Projects Sub <i>[for information]</i> Streets and Walkways Sub <i>[for information]</i>	<b>Dates:</b> 29 April 2022 30 May 2022 31 May 2022
<b>Subject:</b> City Cluster Vision - Well-being & Climate Change resilience: Jubilee Gardens Improvements  <b>Unique Project Identifier:</b> <i>PV Project ID – (TBC at next Gateway)</i>	<b>Gateway 4</b> <b>Regular</b> <b>Progress Report</b>
<b>Report of:</b> Director of Environment  <b>Report Author:</b> Emmanuel Ojugo, City Operations	<b>For Information</b>
<h1>PUBLIC</h1>	

<b>1. Status update</b>	<b>Context:</b>  The implementation of the City Cluster Vision is divided between three programmes:  1) pedestrian priority and traffic reduction, 2) well-being and climate change resilience and, 3) activation and engagement.  In April 2021, Members approved a Gateway 4 report to progress the projects within the City Cluster Programme 2 – Well-being and Climate Change Resilience. Please see Appendix 2 for further detail on the structure of the programme and projects involved.  <b>Project Description:</b>  Jubilee Gardens is one of the high priority projects in this programme as it is one of the few green spaces in the area. The project involves the relandscaping of the Gardens to create a more useable, pleasant, greener and more resilient space. It is being developed in close collaboration with local stakeholders and the City gardens team.  <ul style="list-style-type: none"> <li>○ Please see Appendix 3 for a location plan and visuals of the project.</li> </ul>
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	<p><b>Project objectives:</b></p> <ul style="list-style-type: none"> <li>○ Increase the amount of greenery to help mitigate the impacts of climate change, noise and air pollution and soften the urban environment.</li> <li>○ Deliver more accessible and attractive spaces to rest and spend time in.</li> <li>○ Improve thermal comfort in the area</li> <li>○ The creation of 'green corridors' along busy pedestrian routes.</li> <li>○ Deliver sustainable urban drainage systems (Suds) in line with the Climate Action Strategy.</li> </ul> <p><b>RAG Status:</b> Green (as last report to committee)</p> <p><b>Risk Status:</b> Low (as last report to committee)</p> <p><b>Total Estimated Cost of Project (excluding risk):</b> £500K-£600K</p> <p><b>Spend to Date:</b> £148,972.57 as part of the overall City Cluster Climate change and Well-being programme of works, which involves the design development and evaluation of various projects.</p> <p><b>Costed Risk Provision Utilised:</b> None</p>
<b>2. Key points to note</b>	<p><b>Next Gateway:</b> Gateway 5 - Authority to Start Work (Light) - Delegated</p> <p><b>Key Points:</b> The project scope remains unchanged, and the design has progress to an advanced stage. We are now able to develop the design further towards construction package and agree the programme of works.</p>
<b>3. Reporting period</b>	<p>This report covers the period between April 2021 and April 2022.</p>
<b>4. Progress to date</b>	<p>Site and structural conditions in Jubilee Gardens have been established through surveys and liaison with the operators of the adjacent sub-station UK Power Networks (UKPN). This is essential due to its proximity to underground structures.</p> <p>The City is the freeholder of the site, but the land was leased to the London Electricity Board (now UKPN) who then underlet the top 2 metres back to the City. It is the City's intention to ensure all works are within these top 2 metres to avoid trespassing on any UKPN leasehold interest. Where works may interact with the adjacent UKPN asset it is standard practice to obtain their written consent as part of the submission of the construction package/ risk assessment method statement (RAMS).</p>

	<p>Therefore, a legal agreement will be necessary to permit the City to carry out works adjacent to the substation. The parameters of a legal agreement are currently being developed and will be required ahead of the commencement of any improvement works to Jubilee Gardens.</p> <p>Officers also continue to engage with other local stakeholders to agree the build methodology and programme for implementation, to minimise disruption in the area whilst works are underway. Discussions with UKPN have proved positive and welcome improvements to the area.</p> <p>Architects and landscape architects have been appointed (Studio Weave and Tom Massey landscape) and the design has been advanced to RIBA stage 3/4 (detailed design) and visuals and plans are included in Appendix 3.</p> <p>The proposals being developed seek to replace the existing design and layout of the garden that has poor permeability and can be perceived as uninviting. This is typified by a bulky stone clad perimeter wall over a meter in height, inset with railings and stone clad piers that further increase the height of the enclosure.</p> <p>The large brick clad planters in the interior house planting that is shallow, sparse and functional and appears to concede to adjacent UK Power Networks assets lacking a distinctiveness that enhances the setting of the garden.</p> <p>The proposed design includes:</p> <ul style="list-style-type: none"> <li>• Re-landscaping and replacing the existing dated design layout to create a new greener, more attractive space.</li> <li>• Improve access points, paths, reduced boundary wall bulk/height with inset railings.</li> <li>• Upgraded seating designed to complement the new improved accessible pathways throughout the garden and provide opportunities to rest.</li> <li>• A sustainable approach with climate resilience measures that include a sustainable drainage system (SuDs), a green wall to the north of the site that will replace the free-standing planters that currently require greater maintenance than a largely autonomous SuDs system.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Re-use of materials where possible including the existing garden soil. To this end a soil specialist has been appointed to advise on the optimal PH balance of soil required to improve planting conditions. This approach will inform the planting schedule for Jubilee Gardens and ensure selected planting will thrive here as well as in the wider City environment.</li> </ul>
<b>5. Next steps</b>	<ul style="list-style-type: none"> <li>○ Finalise agreement with UKPN services to carry out improvements adjacent to infrastructure.</li> <li>○ Finalise construction package produced in collaboration with external consultants.</li> <li>○ Undertake targeted stakeholder liaison to inform local users on upcoming works.</li> <li>○ Develop construction programme with new City's Highways Term contractor.</li> <li>○ Gateway 5 (delegated) summer 2022</li> <li>○ Construction – start on site autumn 2022 utilising City's Highways Term contractor.</li> </ul>

### **Appendices**

<b>Appendix 1</b>	Project Coversheet
<b>Appendix 2</b>	City Cluster Programme overview, City Cluster - Well Being and Climate Change resilience Programme
<b>Appendix 3</b>	Site Plan, Existing, Proposed

### **Contact**

<b>Report Author</b>	Emmanuel Ojugo
<b>Email Address</b>	<a href="mailto:emmanuel.ojugo@cityoflondon.gov.uk">emmanuel.ojugo@cityoflondon.gov.uk</a>
<b>Telephone Number</b>	0207 332 1158/07597 425 829



# Project Coversheet

## [1] Ownership

**Unique Project Identifier:** TBC (at GW5 when the individual deliverables are fully reported under the City Cluster Vision Programme 2 – Well Being & Climate Change Resilience)

**Report Date:** 29<sup>th</sup> April 2022

**Core Project Name:** City Cluster Vision - Well-being & Climate Change resilience: Jubilee Gardens Improvements

**Programme Affiliation** (if applicable): N/A

**Project Manager:** Emmanuel Ojugo

**Next Gateway to be passed:** Gateway 5

## [2] Project Brief

### Project Mission statement:

The implementation of the City Cluster Vision is divided between three programmes:

- 1) pedestrian priority and traffic reduction,
- 2) well-being and climate change resilience and,
- 3) activation and engagement.

Jubilee Gardens Improvements is a deliverable project identified within the approved City Cluster Programme 2 – Well-being and Climate Change Resilience. It is one of the high priority projects in this programme as it is one of the few green spaces in the area. The project involves the relandscaping of the Gardens to create a more useable, pleasant, greener and more resilient space. It is being developed in close collaboration with local stakeholders and the City gardens team.

The enhancements are estimated to cost between £500K-£600K and would be funded by the following resources: Cool Streets and Greening programme and Section 106 Agreement of 40 Leadenhall Street.

### Definition of need:

In April 2021, Members approved a Gateway 4 report to progress the projects within the City Cluster Programme 2 – Well-being and Climate Change resilience.

Programme 2 is focused on the creation of a greener more welcoming environment, increased climate change mitigation measures, contributing towards an improved pedestrian experience and well-being.

Jubilee Gardens Improvements is one of the projects in this programme and included within this framework. The project involves the delivery of sustainable drainage system through the redesign and relandscaping of the existing Jubilee Gardens that is currently outdated and in need of improvements.

**Key measures of success:**

- 1) Increase the amount of greenery to help mitigate the impacts of climate change, noise and air pollution and soften the urban environment.
- 2) Deliver more accessible and attractive spaces to rest and spend time in. Improve thermal comfort in the area
- 3) The creation of 'green corridors' along busy pedestrian routes and delivery of sustainable drainage systems (Suds) in line with the Climate Action Strategy.

**[3] Highlights****Finance:**

**Total anticipated cost to deliver [£]: £500K-£600K**

**Total potential project liability (cost) [£]: N/A**

**Total anticipated on-going commitment post-delivery [£]:** Maintenance costs will be fully reported at the next gateway (5)

**Programme Affiliation [£]: N/A**

<b>[A] Budget Approved to Date*</b>	<b>[B] New Financial Requests</b>	<b>[C] New Budget Total (Post approval)</b>
£185,000	£N/A	£500K-600K
<b>[D] Previous Total Estimated Cost of Project</b>	<b>[E] New Total Estimated Cost of Project</b>	<b>[F] Variance in Total Estimated Cost of Project (since last report)</b>
£500,000 - £600,000	£500,000 - £600,000	N/A
<b>[G] Spend to Date</b>	<b>[H] Anticipated future budget requests</b>	
£148,972.57	N/A	

**Headline Financial changes:****Since 'Project Proposal' (G2) report:**

▲ The total estimated cost of the project is estimated at £500K-£600K. Full costs will be confirmed at the next Gateway (5).

**Since 'Options Appraisal and Design' (G1-2) report:**

N/A.

A gateway 4 **Progress Report** is now submitted for Committee for information.

**Since 'Authority to start Work' (G5) report:**

A Gateway 5 Report is the next report to be submitted on this project.

**Project Status:**

**Overall RAG rating:** Green

**Previous RAG rating:** Green

**[4] Member Decisions and Delegated Authority**

N/A..

**[5] Narrative and change****Date and type of last report:**

In April 2021, Members approved a Gateway 4 report to progress the projects within the City Cluster Programme 2 – Well-being and Climate Change resilience.

**Key headline updates and change since last report.**

*Increase in estimated cost*

N/A

*Change in programme*

N/A

**Headline Scope/Design changes, reasons why, impact of change:****Since 'Project Proposal' (G2) report:**

NA.

**Since 'Options Appraisal and Design' (G3-4 report):**

N/A

**Since 'Authority to Start Work' (G5) report:**

N/A

**Timetable and Milestones:**

**Expected timeframe for the project delivery:** Sept/Oct 2022 – March 2023

**Milestones:** <Top 3 delivery and planning milestones (upcoming) >

1) Submit Gateway 5 Report – expected June/July 2022

2) Procurement of materials, permits – August 2020

3) Initiate works – Sept/Oct 2022.

**Are we on track for this stage of the project against the plan/major milestones?** Yes.

**Are we on track for completing the project against the expected timeframe for project delivery?** Yes. We believe the project can be delivered within the reported time frame.

**Risks and Issues**

**Top 3 risks:** <things that have not come to pass>

<i>Risk description</i>	<i>Site conditions affect the City's ability to install street furniture</i>
<i>Risk description</i>	<i>Changes in the City Term Contractor for Environment Department may affect the timetable and resources</i>
<i>Risk description</i>	<i>Local occupiers complain about noise from works</i>

**Has this project generated public or media impact and response which the City of London has needed to manage or is managing?**

N/A

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The City Cluster delivery framework, is structured around three programmes and focused on the implementation of the City Cluster Vision. In addition, the work supports objectives set out in the Transport Strategy, Climate Action Strategy, Commerce and Culture Taskforce and Recovery Taskforce.

The three programmes are:

**Programme 1:**  
**Pedestrian priority & traffic reduction**

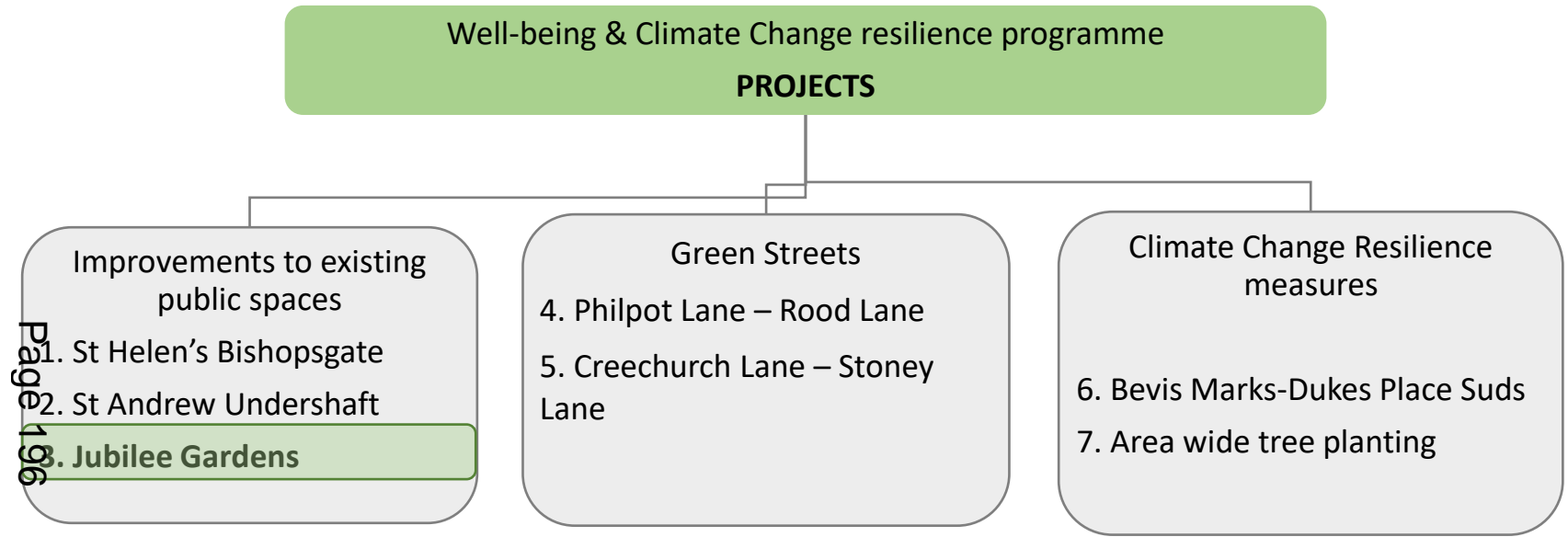
Ensure pedestrian routes can accommodate the projected increases in pedestrians and cyclists flows by rebalancing the street capacity.

**Programme 2:**  
**Well-being & Climate change resilience**

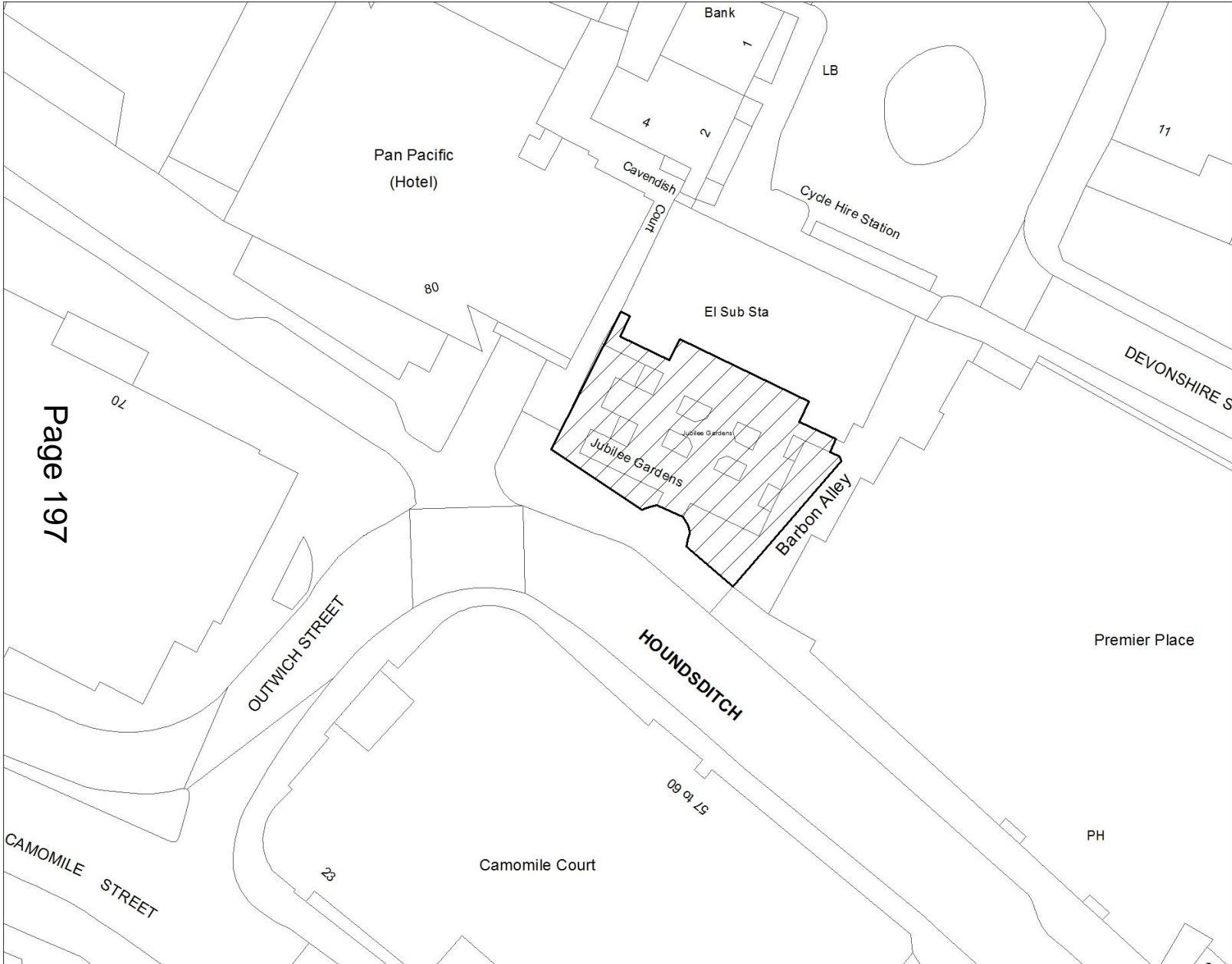
Promote the improvement of public spaces and introduce greenery to deliver an attractive environment.

**Programme 3:**  
**Activation & engagement**

Deliver public places that are welcoming and inclusive; and encourage public participation and social engagement.



Appendix 3. Site Plan. Jubilee Gardens



SITE  
LOCATION  
PLAN

Legend



Created by:  
Emmanuel Ojugo

Date Created:  
19 Apr 2022



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OS 100023243



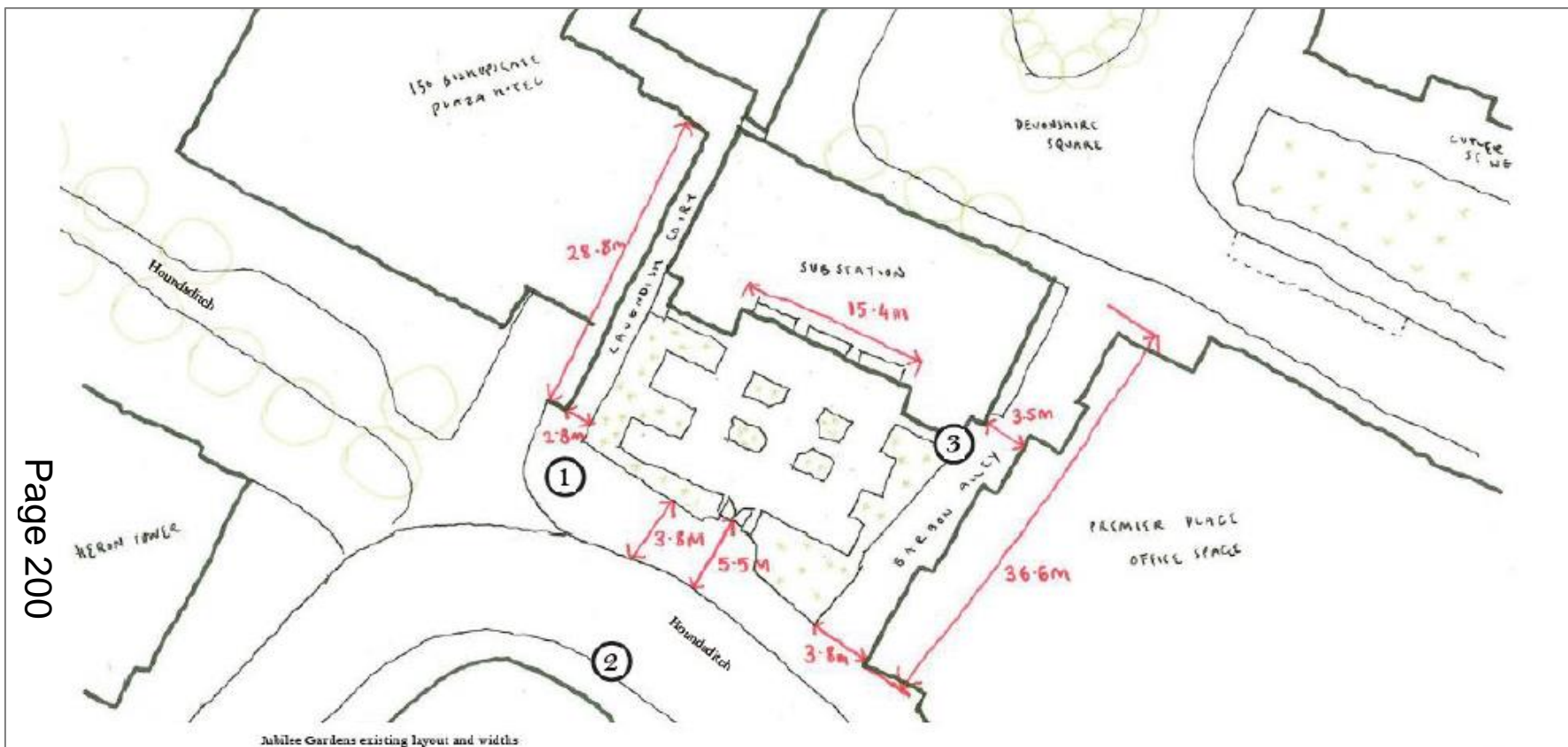




### Appendix 3. Jubilee Gardens | Existing







Jubilee Gardens existing layout and widths









[illegible]

			Sep. 2021	<p>quality in the public realm remains.</p> <p>The experiment concluded on the 18<sup>th</sup> September. All measures have been removed and Beech St is now open to all vehicles. The gaps in the central reservation have been maintained, and as per the Road Safety Audit some safety measures in the form of “wands” have been implemented to protect cyclists from vehicles encroaching into the cycle lanes.</p> <p>The restriction on Fortune Street was removed by Islington on the 24<sup>th</sup> September.</p> <p>There are no initial analyses of traffic counts as these have been affected by southbound traffic on Aldersgate Street being diverted onto Beech Street due to utilities work. But the ANPR cameras are capturing the raw data.</p> <p>Traffic and noise surveys were successfully carried out in the last ten days of the experiment. This data is just being received for analysis. Air quality will be assessed over the coming months.</p> <p>The Project team are meeting regularly with the working group from the Barbican Association to consider options for the new phase of Beech St. A report setting out an approach for next Options for Beech Street will be submitted for December Committee. This will include traffic analysis and other monitoring data, along with the consultation results from the experiment.</p> <p>A comprehensive 6-week public consultation is expected to begin in late March 2022 (after the elections, in line with CoL legal advice), with the intention of a permanent scheme in summer</p>
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				2022.
15 Feb 2022 03 May 2022	<b><u>TfL London Bridge Experimental Scheme</u></b>	Executive Director, Environment	May 2022	An update has been provided on data relating to the London Bridge Experimental Scheme (including enforcement and traffic volumes): data suggested that around four overweight vehicles were travelling over the bridge per day. TfL is considering other approaches, including street design and greater penalties. The Corporation has expressed its concern to TfL around heavy traffic on Tower Bridge

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By virtue of paragraph(s) 3, 4 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

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