

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

	Main Objection points						
	1	2	3	4	5	6	7
Comments relate to							
Correspondence 1				X			
Correspondence 2				x			
City of London Access Team							
Less detailed objections							
Objector A			x	x	x		
Objector B			x	x			
Objector C			x	x			
Objector D				x			
Detailed Objections							
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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