

Appendix 1 – Objections to the Traffic Orders

Bank Junction

Consultation 10 November – 3 December 2021

Date: 2/12/2021	Name: Objector A	Address:
Comments: 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		

Date: 2/12/2021	Name: Objector B	Address:
Comments: Just open it all up fully to traffic Stop messing around by opening one road west bound to pigeons. Get London moving again!!		
Responses: 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). 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 received by Friday 4 February 2022 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: www.cityoflondon.gov.uk/allchangeatbank		

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.

Date: 2/12/2021	Name: Objector C	Address:
Comments: 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		

Date: 2/12/2021	Name: Objector D	Address:
Comments: Simple request. Either scrap the whole scheme or allow taxis full access		
Responses: 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). 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 received by Friday 4 February 2022 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

Follow up comment: received 28/01/22

It is a formal objection to taxis being excluded

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

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

Date: 3/12/2021	Name: Chairman	Address: LTDA
Comments: 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, Threadneedles 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



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,¹ 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.

Model	Taxis	%	Notes
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
Total	13990	100.00%	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 CO₂ than the average car on the road¹. 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*².

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*³, 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.

¹ MAG: Motorcycle Carbon Emissions

² DfT: *Reallocating road space in response to COVID-19: statutory guidance for local authorities*

³ 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 125cc⁴.

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 2019⁵.

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 UK⁴.

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.

⁴ DfT: Vehicle

⁵ Ibid

⁶ 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%⁷. 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 CO₂ than the average car⁸. 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 modes⁸. 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.¹⁰

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.

⁷ MAG: New paper shows the cost of anti-motorcycle transport policy

⁸ Ibid

⁹ National Transport Survey: Purpose of travel

¹⁰ 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 lanes¹¹.

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 2018¹² 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.”

¹¹ London Assembly Transport Committee: Easy rider Improving motorcycle safety on London's roads

¹² 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*¹³, 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 journeys¹⁴.

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.¹⁵

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.

¹³ DfT: *Reallocating road space in response to COVID-19: statutory guidance for local authorities*

¹⁴ DfT: *Reported road casualties in Great Britain: 2018 annual report*

¹⁵ RoSPA *Road Safety Research: Common Motorcycle Crash Causes*

Despite the existence of publications such as the TFL *Urban Motorcycle Design Handbook*¹⁶ 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

¹⁶ 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 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.