

Implications Report

Strategic implications

1. The extent to which any potential changes contribute to the delivery of the Corporate Plan, Transport Strategy and Destination City are being considered as the review progresses.

Financial implications

2. The total cost of the review and taking forward a proposal to approval to implement a change is estimated to be in the region of £643,000 excluding costed risk (this includes the £143,000 estimated to have been spent on the review to reach the July 2023 Court of Common Council decision).
3. Table 1 details the estimated profile of expenditure under Option A to reach the next set of decision reports based on the current agreed programme. This would see any proposal for permanent change through the approvals process within the City and within TfL. Depending on the need for further data collection, there could be funding left towards the implementation of any recommended changes.
4. If it is decided to use an experimental traffic order, there will be other costs required after approvals to implement the changes including monitoring, reporting and consultation on the experimental scheme.
5. The traffic modelling exercise needed for either a permanent or experimental order is expensive and lengthy because the modelling area for changes at Bank is large and covers a high number of signalised junctions.
6. Other aspects of the estimate include some Officer time, TfL costs for reviewing the traffic models, further data collection, consultancy support, stakeholder engagement, a public consultation exercise and further reviews of the equalities assessment as proposals are developed. The estimated costs are based on previous experiences of progressing the Bank model through the TfL audit and approval process.

Table 1

Option A - estimate to Gateway 5			
	Budget	July 2023 - June 2024 decision report	To gateway 5
	£	£	£
Staff	55,000	12,000	43,000
Fees	445,000	125,000	320,000
Total	500,000	137,000	363,000

7. If Option B is approved and the traffic modelling work is restarted earlier than currently programmed, the total amount of money required is not likely to change, but the profile of spend would. The estimate for this is shown in Table 2.

Table 2

Option B - estimate to Gateway 5			
	Budget	July 2023 - June 2024 decision report	To gateway 5
	£	£	£
Staff	55,000	18,000	37,000
Fees	445,000	290,000	155,000
Total	500,000	308,000	192,000

8. Under Option C the only remaining costs would be the completion of the current data collection and analysis which are already committed (approximately £104,000 including officer time of the £137,000 in Table 1).
9. An additional £650,000 of On-Street Parking Reserve has been secured to fund the review up to the point that a final decision on whether to change the restrictions is made. This includes £150,000 of costed risk given the potential for legal challenge of the decision.

Resource implications

10. Depending upon the chosen option there is the possibility of requiring more internal resource than is currently available. Consideration as to how this is managed, for example by reprioritising other work or through additional consultancy support, will be required following the decision on how to proceed.
11. It should also be noted that progressing the traffic modelling work with TfL requires them to have sufficient staff resource to undertake their assessment and audits. This may be a particular issue if we are to immediately restart the modelling process. The capacity of the traffic modelling consultant would also be required.

Legal implications

12. In exercising the City Corporation's functions as traffic authority and taking a decision on the review, the City are required to comply with the duty in Section 122 of the Road Traffic Regulation Act which requires the traffic authority, in exercising its traffic authority functions, to secure the expeditious, convenient, and safe movement of vehicular and other traffic (including pedestrians), so far as practicable having regard to:
 - (a) the desirability of securing and maintaining reasonable access to premises.
 - (b) the effect of amenities of any locality.
 - (bb) national air quality strategy.
 - (c) public service vehicles.
 - (d) any other relevant matters.
13. Under Section 149 of the Equality Act 2010 the public sector equality duty requires public authorities to have due regard to the need to:
 - Eliminate unlawful discrimination, harassment and victimisation
 - Advance equality of opportunity and
 - Foster good relations between those who share a protected characteristic (i.e., race, sex, disability, age, sexual orientation, religion or belief, pregnancy or maternity, marriage or civil partnership and gender reassignment) and those who do not.
14. As part of the duty to have "due regard" where there is disproportionate impact on a group who share a protected characteristic, the City Corporation should consider what steps might be taken to mitigate the impact, on the basis that it is a proportionate means which has been adopted towards achieving a legitimate aim.

Risk implications

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

Programme risks

16. The review is currently on programme to meet the time frame set out in the July 2023 report to the Court of Common Council. The next decision point, on whether to pursue a change to the restrictions, will be the May and June 2024 meetings of the Planning & Transportation Committee and Court of Common Council.
17. If it is decided to change the restrictions at this point then, under the current approach (Option A), then changes to the restrictions are likely to be implemented in Summer 2025 – if successful in gaining TMAN approval and depending on whether it is promoted as an experiment or a permanent change. This timetable is largely driven by the time required for the traffic model audit process which is likely to take at least 12 months, assuming TfL have the capacity to undertake the work.
18. This timetable could potentially be compressed by three to four months under alternative option of immediately beginning the traffic modelling and running this in parallel with the remaining data and collection and analysis (Option B). This time frame would be subject to TfL resourcing and there is a risk of abortive work and costs if it is decided to not pursue any change to the restrictions at Bank.
19. The timeframes above are similar to the original timeframe for the review that was agreed in 2021 before the Court of Common Council motion to begin an immediate review. They are 8 – 12 months longer than originally anticipated when the review was initiated, when implementation was expected in summer 2024. It is recognised that these extended timeframes carry a degree of both political and reputational risk.

Equalities implications

20. Further equalities analysis will be undertaken as the review progresses.

Climate implications

21. The extent to which any potential changes contribute to the delivery of the Climate Action Strategy will be considered as the review progresses.

Security implications – N/A