

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

Summary

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

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

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

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

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

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

The EqIA concludes: **“The additional research undertaken on taxi availability, journey times, and journey costs suggests that, as a whole, the restriction of taxi access through Bank junction between the hours of 7am to 7pm has not led to any extensive negative impacts on equality, and the impacts of the restrictions outside of these hours is deemed to be negligible.**

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

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

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

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

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

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

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

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

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

Recommendation(s)

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

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

Main Report

Background

1. 'Taxi' in this report refers to licensed taxis (black cabs) only. Private hire vehicles (minicabs) are considered as part of general traffic. It is possible to restrict access for general traffic while still allowing taxis. Access for powered two wheelers (motorcycles and mopeds) can also be considered separately.
2. A motion approved at the Court of Common Council in April 2022 requested that the Planning & Transportation Committee immediately begin a review of the nature and timing of the restrictions at Bank Junction, considering all options, and present a recommendation to the Court of Common Council.
3. This motion brought forward the planned review of the restriction, given that the Streets & Walkways Sub Committee had previously agreed in September 2021 that this would begin 12 months after the completion of construction, i.e. in spring 2025.
4. In March 2023, the Planning & Transportation Committee agreed that no further work on the option to reintroduce general traffic into Bank would be undertaken. The review has since focussed on assessing the need for changes to the restrictions to allow access for taxis and/or powered two wheelers.
5. In December 2023, the Court of Common Council decided to immediately restart the modelling of the traffic impacts, running this work in parallel with the data collection and analysis to identify and evidence a need for change.
6. Work on the traffic modelling elements is underway and is being conducted in close collaboration with TfL. This work is unrelated to the evidence base for change and is not covered in this report.
7. Any changes to the restrictions at Bank require an application to TfL under the Traffic Management Act Notification (TMAN) process. A full traffic model audit from TfL will be required before a TMAN application can be made and considered.
8. The current 7am – 7pm, Monday to Friday, bus and cycle only restriction at Bank junction was first introduced in May 2017. The primary objective was to improve safety at the junction, which was a hotspot for collisions, including two fatal collisions in 2012 and 2015.

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

Current Position

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

20. The EqIA to inform this review was carried out by Steer. The EqIA considers the benefits and disbenefits for different protected characteristic groups of the potential changes to allow taxis and/or powered two wheelers through the junction during restricted hours. The full EqIA and accompanying Technical Note is provided in Appendix 3.
21. This report concludes the review requested by the Court of Common Council in April 2022. The next steps, should Members agree to pursue a change to the restrictions at Bank, are provided in Appendix 4.

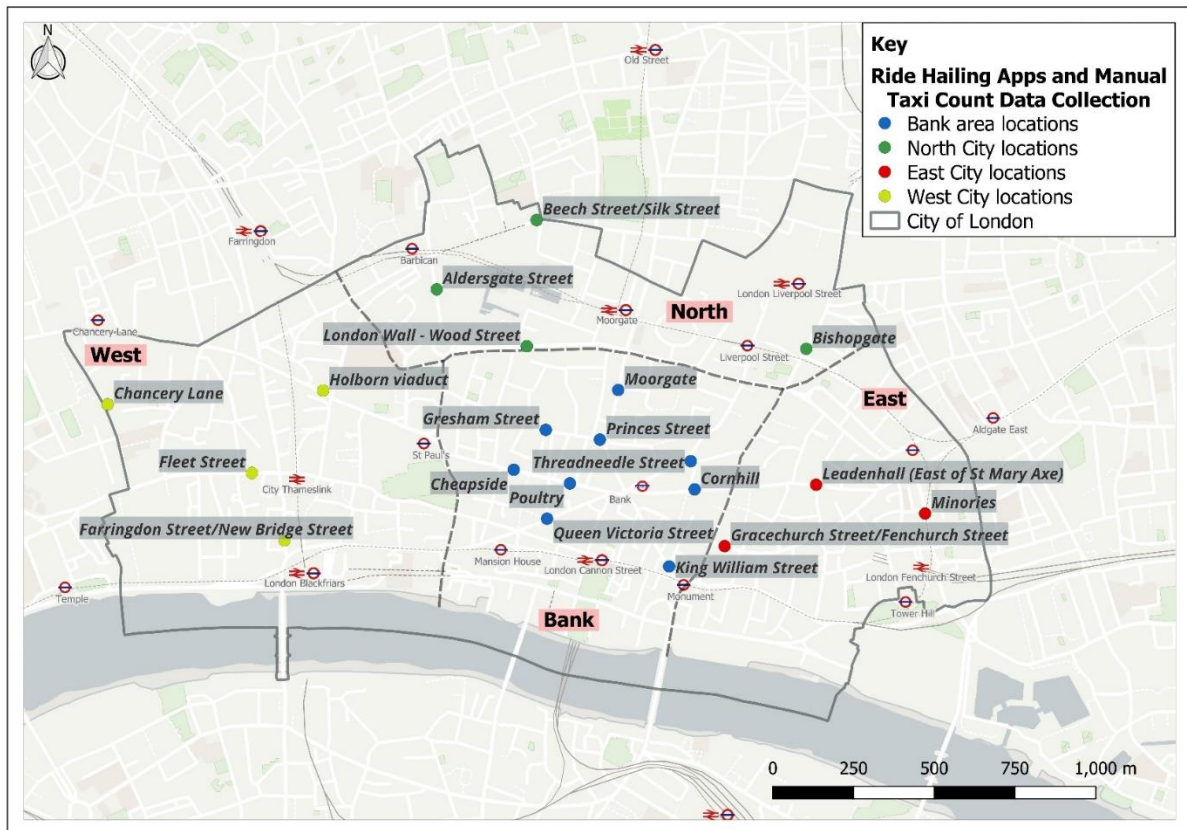


Figure 1: 2023 Taxi availability survey sites and area boundaries

Travel in the City of London

22. The most consistent and reliable source of data on how people travel to/from and within the City is the London Travel Demand Survey (LTDS). This is a long running annual survey of 8,000 Londoners conducted by TfL.
23. The average mode share for trips originating in the City based on data from 2017/18 - 2019/20 is provided in Table 1. Data for 2022/23, the first full year for which post-pandemic data is available, is also provided.
24. A trip represents the main mode of travel used for a journey. Many trips in the City, especially those made by public transport, will involve some travel by another mode, mainly walking.

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

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

25. TfL analysis of London-wide LTDS data¹ found that the most common form of transport used by Londoners was walking. 95% of respondents said they walked at least once a week. The figure is lower for disabled people (81%) and those aged over 65 (87%). 3% of Londoners reported using a taxi at least once a week, with relative consistency across different groups including disabled people (3%) and those over 65 (2%).
26. The TfL analysis also found that for Londoners with lower household incomes (below £20,000) the bus is the second most used form of transport after walking. Compared with 59 per cent of all Londoners using the bus at least once a week, 69 per cent of people with lower household incomes take the bus. 2% of people from households with lower incomes reported using a taxi at least once a week.
27. A table summarising the travel modes used by different communities is provided in Appendix 5.

Taxi availability and trends

Taxi rank usage

28. Data collected by WSP found that most of the 30 ranks across the City are lightly used by taxi drivers, with only a small number very well used across the day. WSP's findings include:
- 2002 taxis were recorded across 30 ranks over 24 hours.
 - Liverpool Street station has the highest recorded number of taxis across the day (879). This rank operates differently to the other ranks in the City as it operates near the station exit as a continuous feeder rank.
 - Excluding Liverpool Street station there is little difference between rank usage by geographical area. What appears more important in terms of rank usage is the proximity of the rank to key attractors such as stations, tourist destinations and hotels.
 - Across all sites, 30% of taxis left the rank without picking up a passenger.

Taxi availability via ride hailing apps

¹ [Travel in London: Understanding our diverse communities 2019 \(tfl.gov.uk\)](https://tfl.gov.uk/research-and-data/understanding-our-diverse-communities-2019)

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

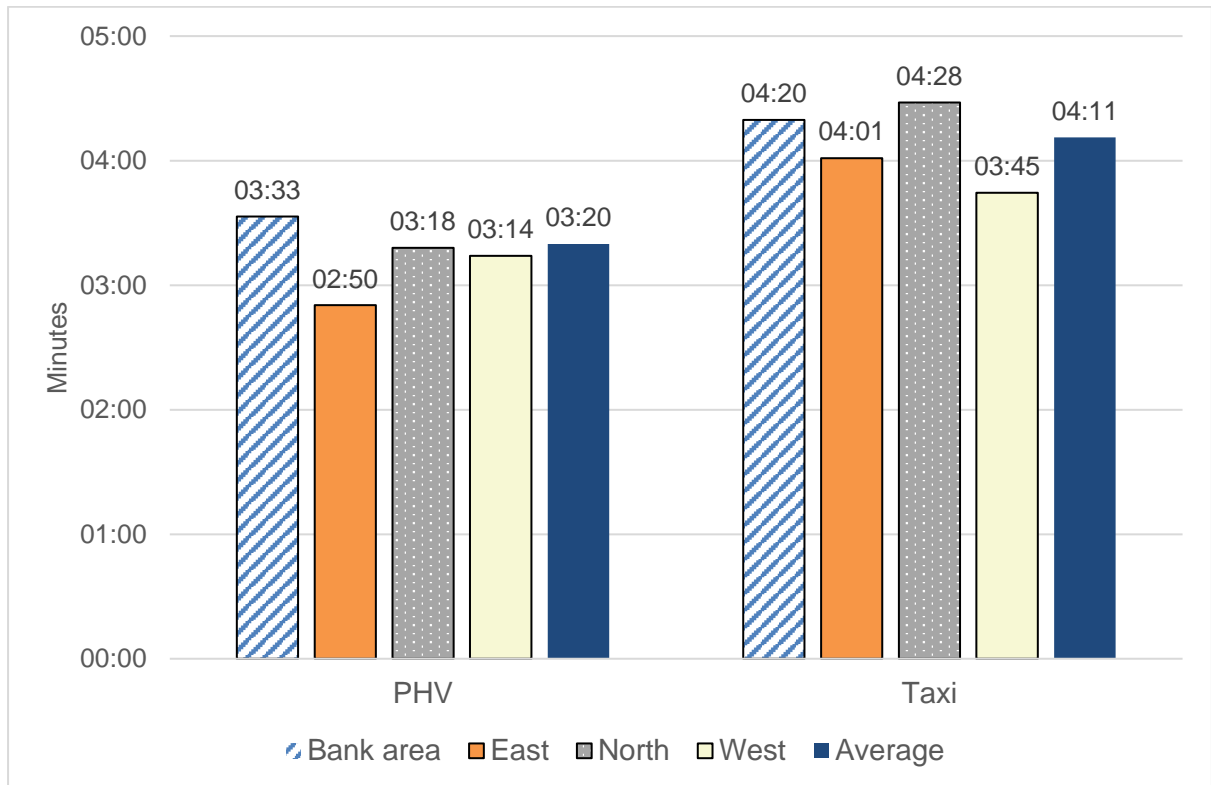


Figure 2: Average wait time for a private hire vehicle or taxi split by area based on ride hailing app data (7am to 1am on a weekday)

30. While this exercise did not take account of drivers not accepting requests or cancelling accepted requests, the data suggests that throughout the day there is good availability of both taxis and private hire vehicles via ride hailing apps, and that the Bank restrictions have no significant impact on these.
31. In relation to taxi availability via apps, Steer commented that: "Though there was little variation in taxi and private hire vehicle wait times across the [City], Poultry and Cornhill were within the top three locations with the highest average taxi wait times across all the sites surveyed". Steer also summarised that "The analysis shows that the average wait time for taxis and private hire vehicles in the Bank junction area is not significantly higher when compared to the rest of the [City] (Approximately +13 seconds for private hire vehicle users, and +10 seconds for taxi users). Overall, this difference in average wait time is not considered to disproportionately impact [disabled people, older people with mobility impairments due to ageing, or pregnant women with acute mobility impairments]."

Taxi availability on-street

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

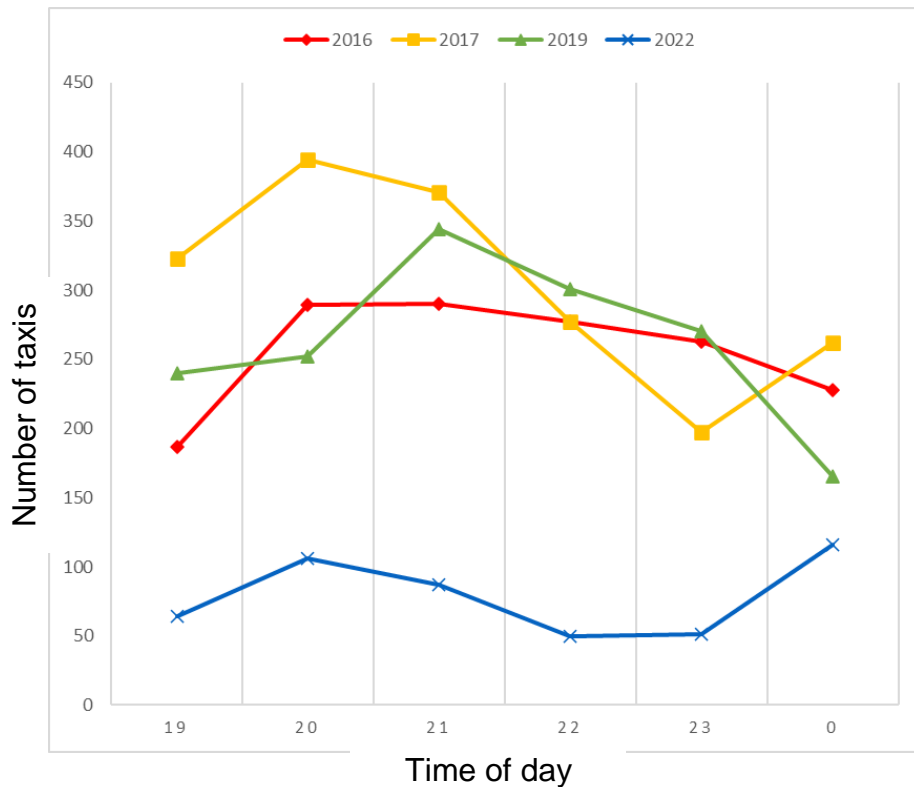


Figure 3: Total taxi numbers on King William Street and Poultry, 7pm – 1am between 2016 and 2022.

Wider trends in taxi numbers

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

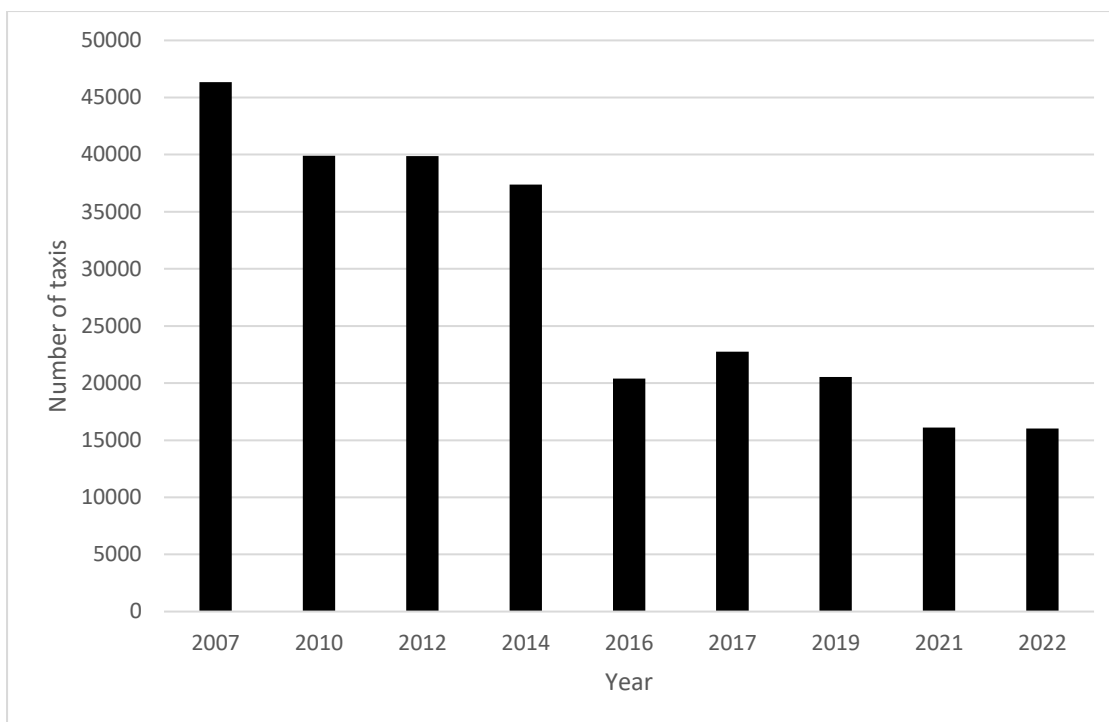


Figure 4: Taxi numbers counted at 15 sites between 7am and 7pm

41. The number of taxis recorded entering the Congestion Charge Zone (during charging hours) fell by 55% between 2016 and 2023.
42. The number of licensed taxis drivers with an All London licence, which includes the City, has also reduced significantly over this time from 21,274 in 2016/17 to 16,327 in 2022/23, a 24% drop. The latest data from TfL suggests that this trend is continuing, with 15,608 All London licences recorded in March 2024, a 4% reduction compared to 2022/23².
43. As part of their analysis WSP compared data on taxi numbers provided by Westminster City Council with data for the City. This comparison, set out in Table 2, suggests that drops in taxi volumes are not unique to the City, or in particular the Bank area.

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

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

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

Journey times and costs

44. WSP undertook journey time surveys for four routes:

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

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

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

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

The impact of changing the restrictions at Bank on project objectives

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

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

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

Continue to reduce casualties by simplifying the junction

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

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

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

52. In 2023 (up to 30 November), there were no recorded collisions or casualties within the junction itself, at any time. One collision/casualty has been recorded on the periphery, on Cornhill near Birchin Lane. This occurred within the restricted times. Note that this time period overlaps with the construction of All Change at Bank. Further detail can be found in Appendix 7.
53. City-wide, between January 2019 and November 2023 there have been 192 casualties from collisions recorded as involving a taxi (including private hire vehicles) and 66 from collisions involving powered two wheelers³. Over the same time there were 320 casualties from collisions involving a car and 117 from collisions involving a pedal cycle. Note that both car and taxi figures could include private hire vehicles and it is not possible to put a precise figure on the number of collisions that involve a taxi.

Reduce pedestrian crowding levels

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

³ TfL Road Safety Data Reports

Improve air quality

55. On average during 2023 NO₂ levels at monitoring sites at Bank junction were below the legal limit (40 µg m⁻³) and have been since 2022, when all sites monitored in the wider area were below the legal limit for the first time. While changing the restrictions to allow taxis or powered two wheelers will increase the number of motor vehicles using the junction this is unlikely to have a significant impact on air quality. Approximately 50% (December 2023) of the taxi fleet is now zero emission capable and all new taxis are required to be zero emission capable. Any increase in NO₂ or particulates is likely to be negligible in comparison with background levels.

Improve the perceptions of place

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

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

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

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

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

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

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

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

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

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

Other considerations

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

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

- Pregnancy and Maternity
- Sex

77. The concerns raised include “decreased taxi availability, increases in time for taxi journeys and longer routes, plus corresponding increase to taxi fares and decreased safety as a result of less passive surveillance from vehicles. A more general concern is that taxi use is relied upon for essential mobility across protected characteristics”. These concerns were already a consideration for the EqlA.
78. Steer’s review focused on the themes raised within the responses. It was not possible to indicate frequency of concern due to not having the full data set. It was also not always possible to differentiate if a respondent was a taxi driver or passenger.
79. The number of City workers has continued to grow in recent years, with 615,000 workers in the City of London in 2022⁴. This number has increased from 542,000 in 2019. Growth is anticipated to continue with approx. 840,000sqm of office floorspace currently under construction (February 2024).
80. Infrastructure provision for people using public transport, walking, wheeling and cycling will need to respond to this growth to ensure the comfort and safety of people living, working and visiting the City. However, this expected growth has not been factored into this review as the layout of Bank junction does not need to change.

Powered two wheelers

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

⁴ [City of London factsheet March 2024](#)

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

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

Proposals

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

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

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

Corporate & Strategic Implications

Strategic implications

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

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

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

Financial implications

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

Resource implications

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

Legal implications

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

(a) the desirability of securing and maintaining reasonable access to premises.

(b) the effect on the amenities of any locality affected.

(bb) national air quality strategy.

(c) the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.

(d) any other relevant matters.

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

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

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

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

Risk implications

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

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

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

Equalities implications

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Climate implications

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

Security implications – None

Conclusion

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

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

Appendices

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

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

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

Appendix 4 – Next steps and indicative programme

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

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

Appendix 7 - Casualty/Collision information

Appendix 8 – Bank junction Traffic modelling area

Appendix 9 – Correspondence received.

Background Papers

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

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

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

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

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

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