Equality Impact Assessment (EqIA)
April 2024

All Change at Bank – April 2024 Equality Impact Assessment (EqIA) Update

City of London Corporation
23949605

steer

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1 Introduction

Introduction

1.1 This Equality Impact Assessment (EqIA) relates to potential changes to the traffic restrictions at Bank junction. The City of London (CoL) seeks to ensure that any change fully considers accessibility needs and provides an auditable document trail that sets out design considerations and decisions.

1.2 For context, a short summary of this scheme has been provided within this section of the report.

All Change at Bank scheme

1.3 The All Change at Bank scheme was developed in order to provide more space for people walking and to enhance the public realm. Changes (currently under construction) will simplify the junction to prioritise the space for pedestrians, allowing space for seating and greening:

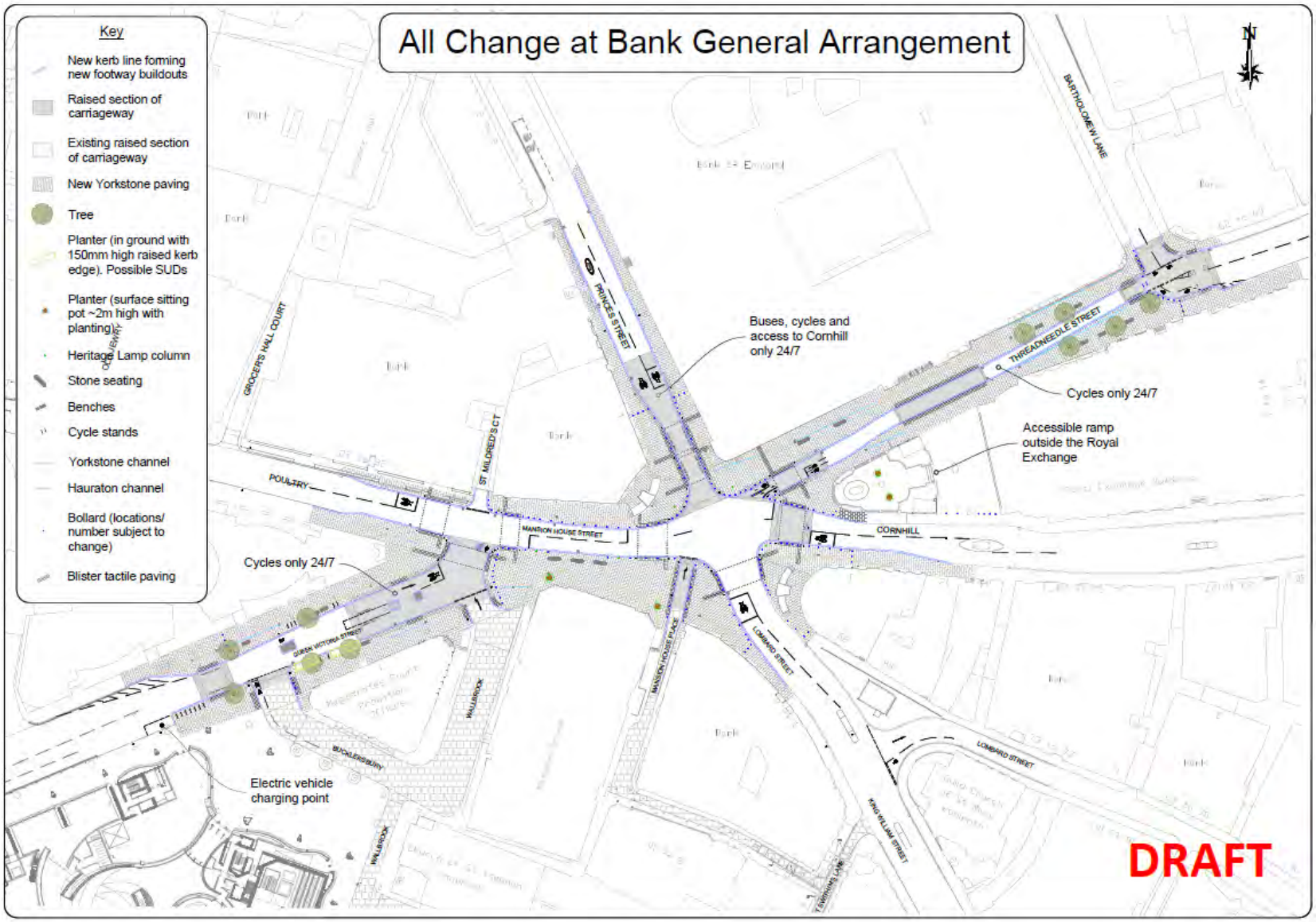
- Parts of Threadneedle Street and Queen Victoria Street will be closed to all motor vehicles 24/7
- Princes Street will see changes that will be in place 24/7
- Only buses and cycles will be able to travel northbound towards Moorgate
- Vehicles needing to access Cornhill will be able to travel southbound and turn left into Cornhill

1.4 The main traffic junction will be made smaller, making it clearer to those driving or cycling as to where they should be positioned on the carriageway. There will be fewer opportunities for turning manoeuvres, reducing the risk of collisions. Narrower carriageways will mean larger footways and more comfort for pedestrians.

1.5 Traffic restrictions of buses and cycles only, Monday-Friday, 7am-7pm across Bank junction and travelling westbound into Cornhill will be retained. The design requires some alterations to bus routes (primarily 8, 11. 26 and 133) – as well as to several stops on each of these routes as buses will no longer have access to Queen Victoria Street and Threadneedle Street. Bus stops have been relocated at the closest alternative location, which does not lead to significant increases in journey times.

1.6 **Figure 1.1** presents the proposed design.

Figure 1.1: All Change at Bank proposed layout (source: City of London)



Existing EqIA (November 2021)

1.7 As the All Change at Bank scheme is aimed at making Bank junction more attractive to people walking and dwelling, as well as safer and less polluted, it is considered that the scheme is likely to impact people's movement and experience of streets and spaces. Groups that have a significant intersection with movement and space, i.e., those that travel in distinguishably different ways, are most likely to be affected. CoL has already completed a Test of Relevance for the All Change at Bank scheme. This identified the following four protected characteristics for assessment: age, disability, pregnancy and maternity, and race.

1.8 An EqIA was then completed by Steer on behalf of CoL to assess the overall impact of the project for all road users and for those who share one or more protected characteristic. This EqIA was completed prior to the implementation of the design to pre-empt any potential disproportionate impacts upon these protected groups and suggested alterations and additions where they may have been necessary.

1.9 The EqIA was based on information supplied by CoL as well as readily available data from other sources. This included traffic counts, pedestrian and cyclist counts, bus journey time modelling and background information through the Bank on Safety scheme.

EqIA for traffic restrictions review (February 2023)

1.10 In a motion passed at the Court of Common Council in April 2022, elected members agreed to review the traffic restrictions currently in force at Bank junction, with the potential to amend the restrictions to allow access to taxis (black cabs only) and powered two wheelers (P2Ws). Since 2017, only buses, cyclists and pedestrians have been allowed to access Bank junction between 7am and 7pm on weekdays.

1.11 To establish the likely equality impacts on revising the modes permitted through the finalised scheme, Steer was commissioned to undertake an additional EqIA to assess the likely impacts of allowing the following vehicular mixes through Bank junction:

- Scenario 1: Buses, cycles, and taxis
- Scenario 2: Buses, cycles and P2Ws
- Scenario 3: Buses, cycles, taxis and P2Ws
- Scenario 4: Buses, cycles, and all motor traffic

1.12 In each of these scenarios, the arms of the junction available for those vehicles would be the same as those available to buses and cycles in the scheme that is currently under construction, which are Cornhill, King William Street/Lombard Street, Poultry and Princes Street.

1.13 The existing baseline information produced for the November 2021 EqIA was updated with the most recent London Travel Demand Survey (LTDS) and Census 2021 data, as well as new modelling inputs supplied by CoL to establish impacts on journey times.

EqIA update following additional data collection (March 2024)

1.14 Since the February 2023 EqIA update, additional research was conducted to provide supplementary data to enhance understanding of the potential impacts of restricting taxi access for people who rely upon taxis as essential mobility.

1.15 Steer was commissioned to analyse these additional findings in relation to taxi access, which is presented as an addendum to the February 2023 EqIA in the **Technical Note: Analysis of Additional Datasets**, which is appended to this document. This main document (February

2023 EqIA) has also been updated with the most recent datasets and literature now available to support the assessment.

1.16 A summary and conclusions from the Analysis of Additional Data sets can be found within Chapter 5 of this report.

2 Baseline

General

Workforce

2.1 CoL has a very large workforce in comparison to its usual residential population. The 2021 Census recorded the residential population as 8,600 people and the 2011 Census recorded the workforce as 357,000 people[1] – over 40 times the usual residential population which demonstrates the significant movement in and out of CoL every day.

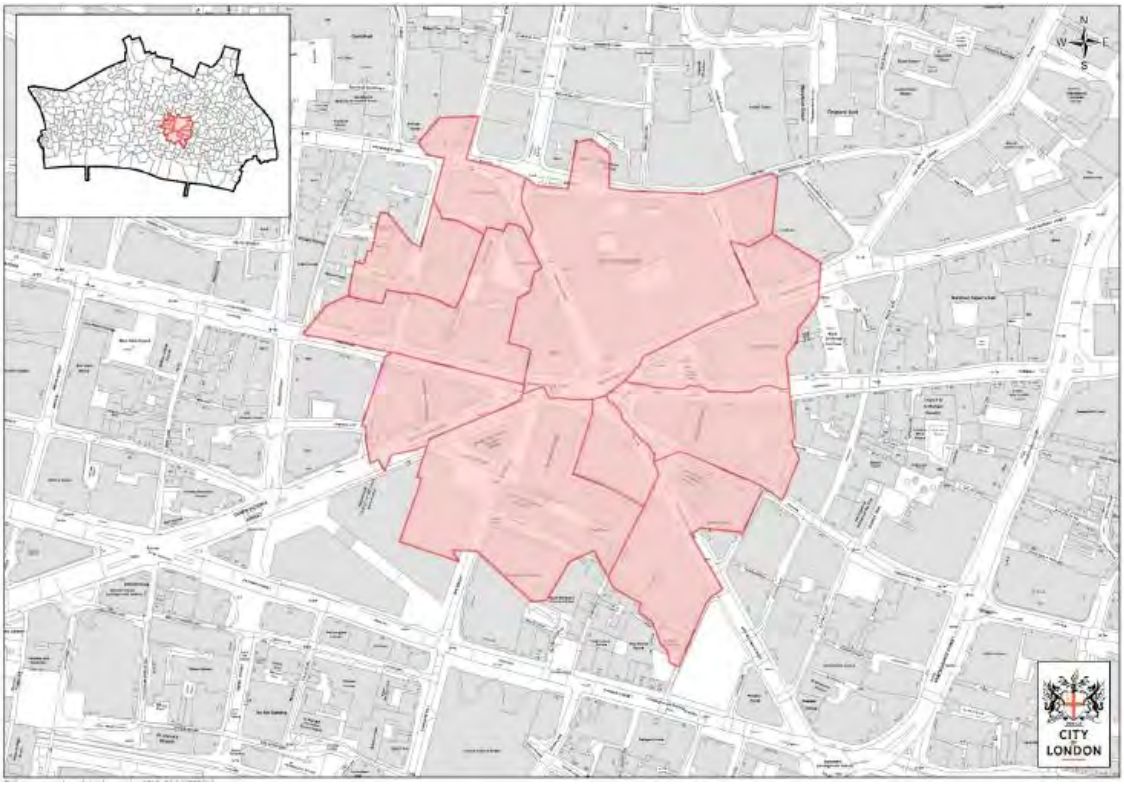
2.2 More recently, the 2022 workforce was estimated to be 615,000[2]. CoL shows the highest workplace density of all local authorities in Greater London with the primary land use in CoL being offices, which make up more than 70 per cent of all buildings. In absolute terms, CoL has the second greatest workforce after the City of Westminster, with a gender split of 63 per cent males and 37 per cent females in 2021.

2.3 The workforce located within the Bank junction Workplace Zone, as defined in the zone shown in **Figure 2.1,** amounts to 9,100 people. **Figure 2.2** shows that the workforce's age profile in the Bank junction Workplace Zone follows a similar trend to that of CoL as a whole, with the most common age group being those aged 30-34. The workforce aged 55+ in the Bank junction Workplace Zone is lower when compared to the workforce aged 55+ across CoL as a whole.

[1] 2021 Census data indicates that 67,224 people recorded their workplace destination within CoL, which similarly represents a significantly higher workforce population in comparison to the resident population. However, 2021 Census data does not capture the workforce accurately due to the effects of the Covid-19 pandemic and associated restrictions on movement and social gatherings at the time of recording (see **https://www.nomisweb.co.uk/sources/census_2021_od**)

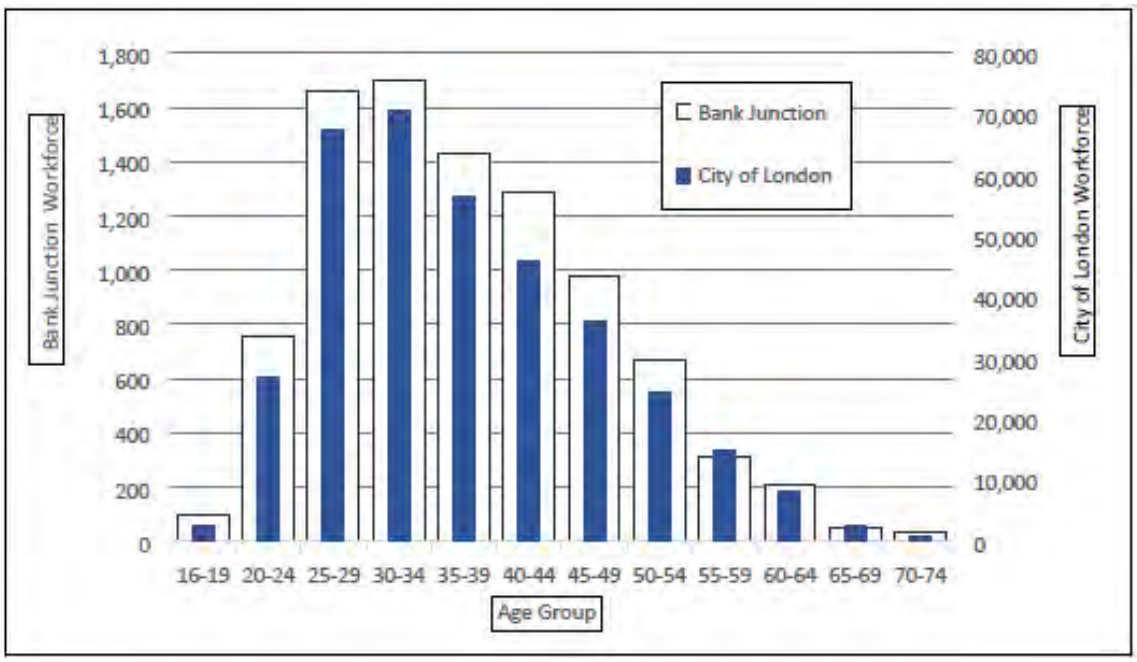
[2] **City of London Factsheets February 2023**

Figure 2.1: Bank Workplace Zone



Source: Bank on Safety Equality Analysis with data from Office for National Statistics

Figure 2.2: Age of daytime occupants within the Bank junction Workplace Zone



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

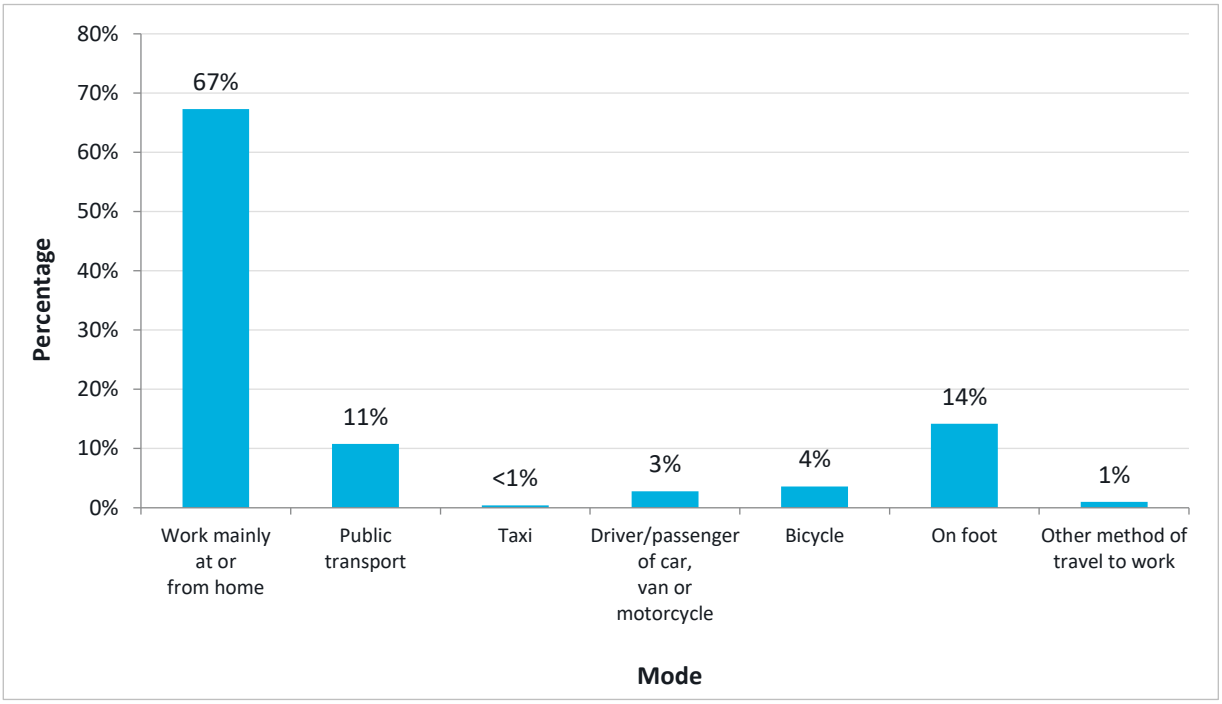
2.4 When compared to Greater London, CoL has a higher proportion of professional occupations, associated professional and technical occupations, skilled trades occupations, and

administrative and secretarial occupations. Professional and associate professional/technical occupations represent over half of occupations within CoL.

2.5 2021 Census data shows most people in employment in CoL work mainly at or from home, as shown in **Figure 2.3**.This is followed by public transport use (11 per cent). Active travel also comprises a relatively high percentage of travel (14 per cent on foot, and 4 per cent cycling).

2.6 Please note that these figures have changed significantly since 2021 due to the change in working arrangements and patterns attributed to the COVID-19 pandemic, however CoL can only act on the latest data available.

Figure 2.3: Method of travel to work for people in employment in the City of London

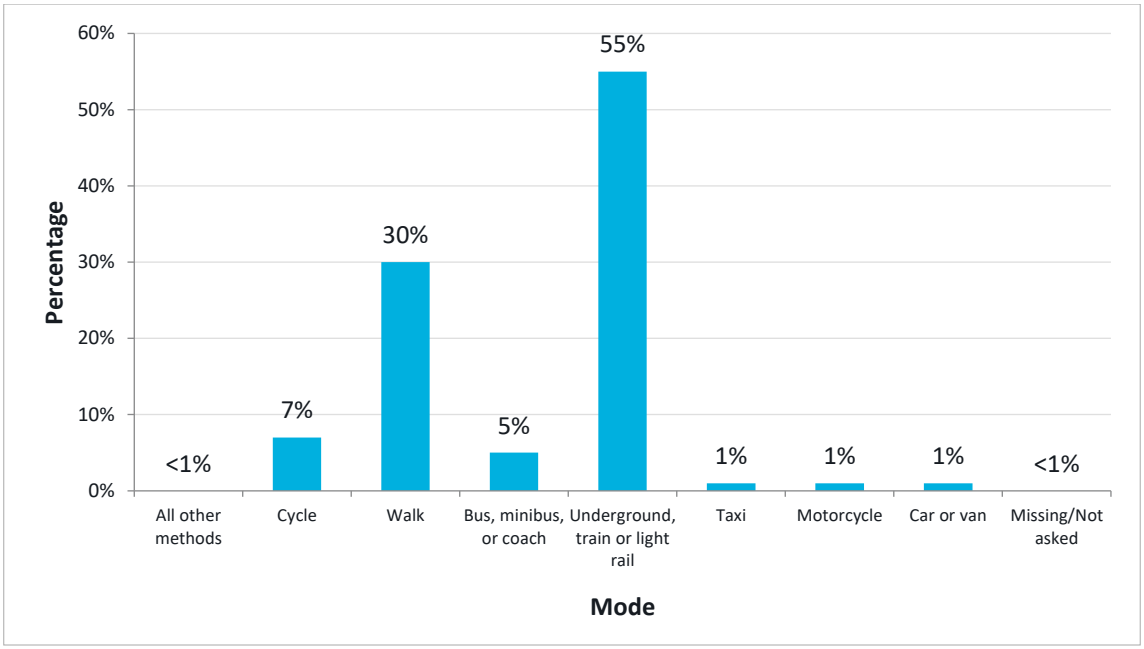


Source: 2021 Census

2.7 Data from TfL's London Travel Demand Survey (LTDS) 2019/20 has been analysed to inform this EqIA, to understand any differences in the travel patterns exhibited by people with different protected characteristics. LTDS is an annual survey of a sample of households across Greater London including CoL. The survey records detailed information about the household, the people that live there, and the trips they make. Every year, approximately 8,000 households take part in the survey which is then weighted using an interim expansion factor to approximate the data for the entire population of London, thus providing an insight into how Londoners travel on a weekly basis. For the purposes of this EqIA, trips that ended in CoL have been analysed. Due to the London-wide nature of this survey, it has not been possible to limit the analysis to trips ending in the Bank junction area, as the low sample size means that it would not be appropriate.

2.8 When analysing LTDS for all trip purposes, the following mode split for travel into CoL was obtained. As shown in **Figure 2.4**, of all trips ending in CoL, 60 per cent are made using public transport. 55 per cent of trips are made using the Underground or other rail modes and 5 per cent are made by bus. It can also be seen that walking has a much higher proportion for all trips (30 per cent) when compared to the 2011 Census Travel to Work data (5 per cent).

Figure 2.4: Method of travel to the City of London for all purposes

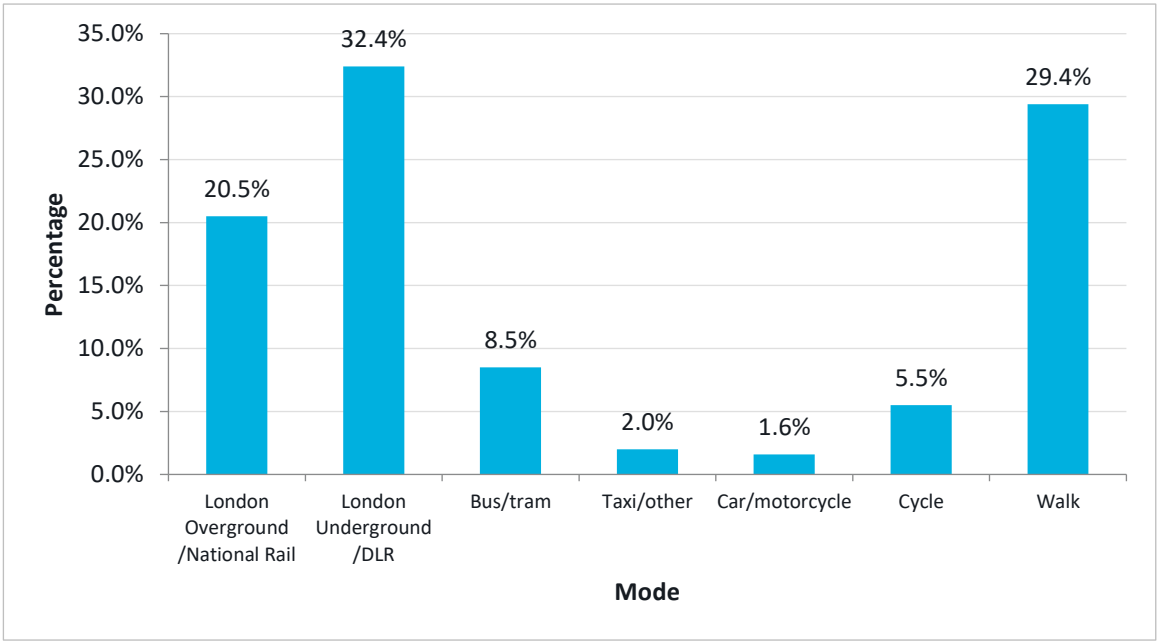


Source: LTDS 2019/20

2.9 Please note that this mode split involves other trip types in addition to 'travel to work' trips. Based on the 2019/20 LTDS data for trip purposes to CoL of London, 71 per cent of trips were for Work (usual workplace and other) and 29 per cent of trips were for other purposes (such as leisure and shopping).

2.10 At the time of preparing this document, the full LTDS 2022/23 dataset was unavailable. However, data was obtained by CoL from TfL's Strategic Analysis which illustrates the proportions for trips per day, by mode. As shown in **Figure 2.5**, active travel trips comprise nearly a third of journeys that originate within the CoL, and over 60 per cent of journeys

Figure 2.5: Percentage of trips per day, by mode, originating within CoL (2022/23)



originating in CoL via public transport. In contrast, a small proportion of trips per day are made by private vehicle (3.6 per cent).

2.11 The more recent data in **Figure 2.5** indicates that a relatively small proportion of trips that originate within CoL are made by taxi (2 per cent) and car/motorcycle (1.6 per cent). This reflects the proportion of modes in the LTDS 2019/20 data for CoL, in relation to method of travel to CoL for all trip purposes, wherein 60 per cent of trips were made via public transport, and over a third of trips were made by active travel (37 per cent).

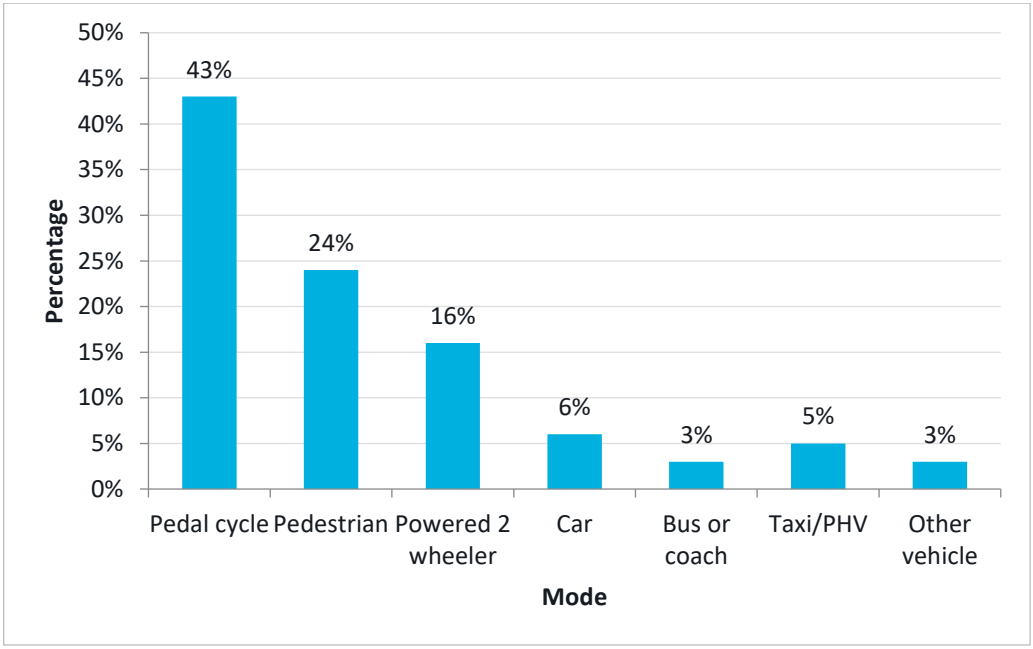
2.12 Proportions of private vehicles, including car, taxi, and van (1 per cent mode share each, respectively) are also comparable to the 2022/23 data in relation to journeys originating within CoL. This suggests that travel patterns have returned after the COVID-19 pandemic, however, other factors may have also influenced mode share across CoL between 2019/20 and 2022/23.

Road safety

2.13 STATS19 (the national database containing a record of reported road traffic accidents) data has been analysed for road safety analysis. **Figure 2.6** and **Figure 2.7** below show the travel mode splits for collisions in CoL and Bank junction. Casualties using active modes accounted for 68 per cent and 96 per cent of all casualties involved in collisions in CoL and Bank junction, respectively. Pedal cyclists and pedestrians saw a higher proportion of casualties at Bank junction compared to CoL. It should be noted that bus or coach collisions are often described as passengers' falls due to sudden braking, and they rarely involve any vehicle impact.

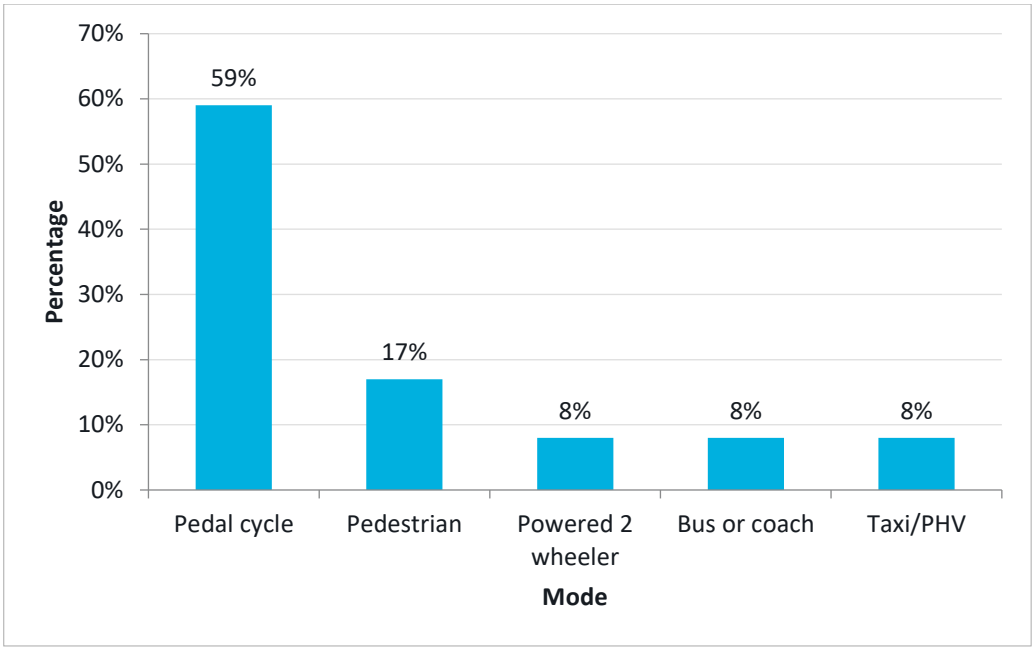
2.14 Analysis of the collisions within Bank junction has been undertaken. Where Bank junction is referred to in the STATS19 2020-2022 dataset, collisions and casualties have been calculated based on a 50-metre radius from the centre of Bank junction.

Figure 2.6: Mode of travel for casualties involved in collisions for City of London



Source: STATS19 2020-2022

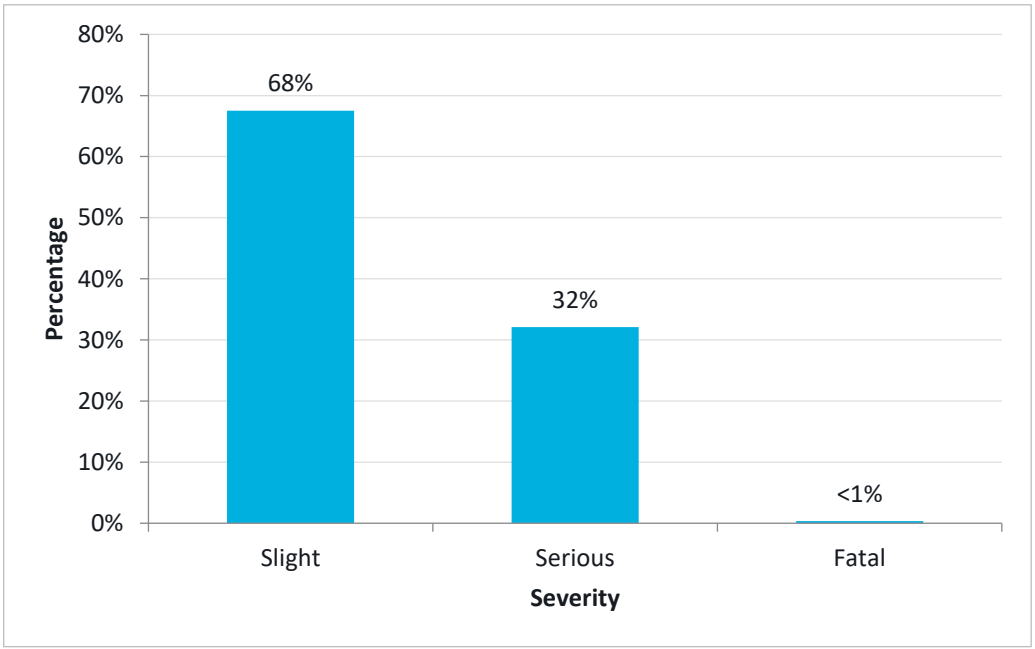
Figure 2.7: Mode of travel for casualties involved in collisions for Bank junction



Source: STATS19 2020-2022

2.15 **Figure 2.8** and **Figure 2.9** show the severity of incidents between 07:00 and 19:00 Monday to Friday for City on London and Bank junction. KSIs (Killed or Seriously Injured) account for 32.5 per cent of casualties involved in collisions from 2020-2022 in CoL. KSIs[3] account for a smaller percentage of casualties at Bank junction, with 13 per cent of incidents resulting in KSIs.

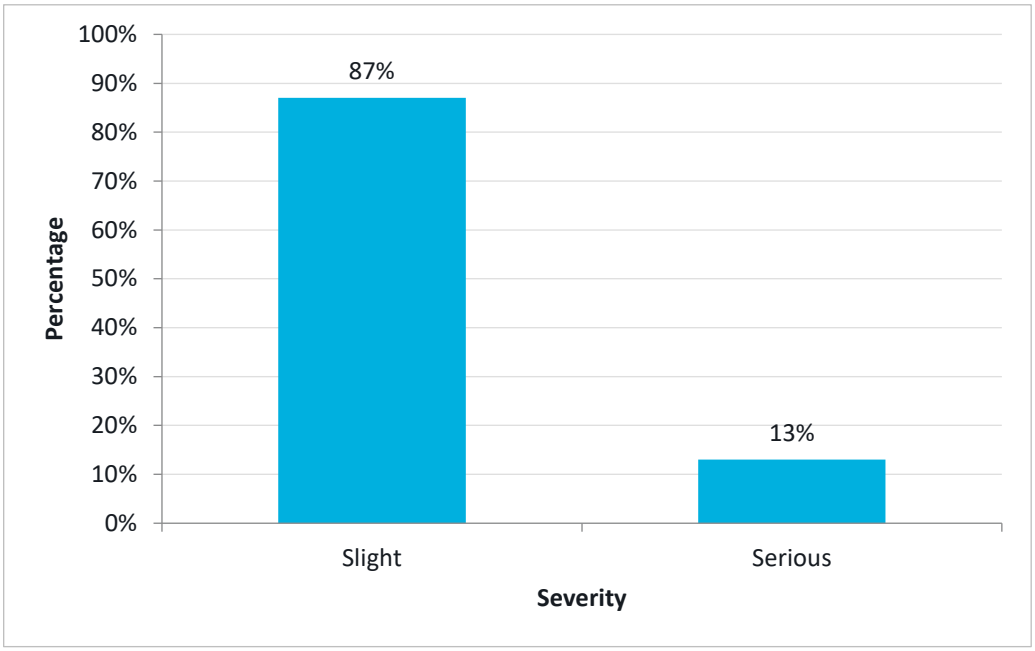
Figure 2.8: Severity of incidents for City of London Monday to Friday 07:00 – 19:00



[3] Please note that no fatalities were recorded in STATS19 data for the Bank junction area, 2020 – 2022.

Source: STATS19 2020-2022

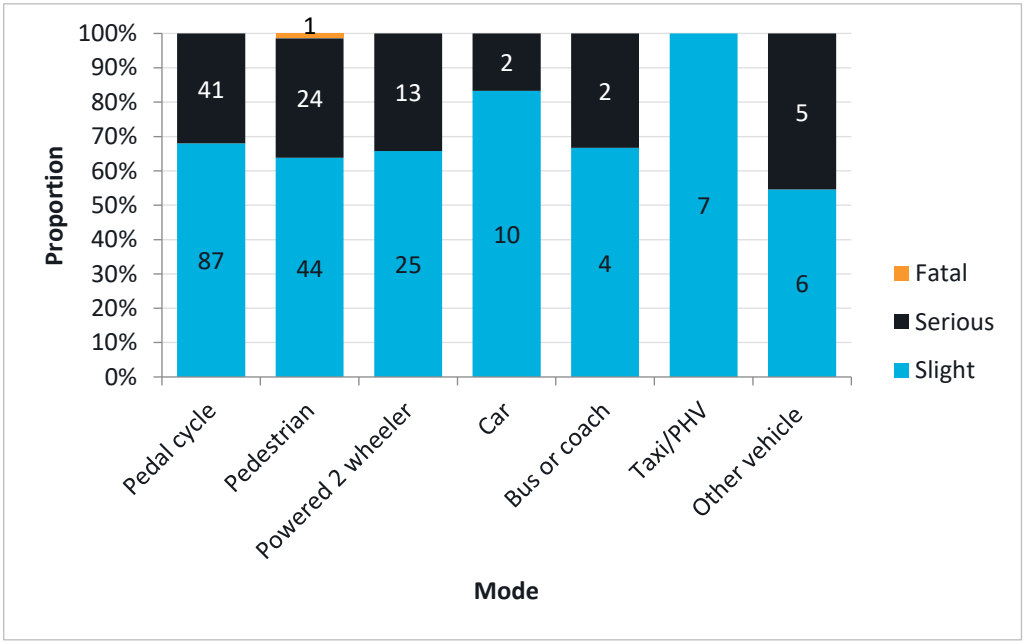
Figure 2.9: Severity of incidents for Bank junction Monday to Friday 07:00 – 19:00



Source: STATS19 2020-2022

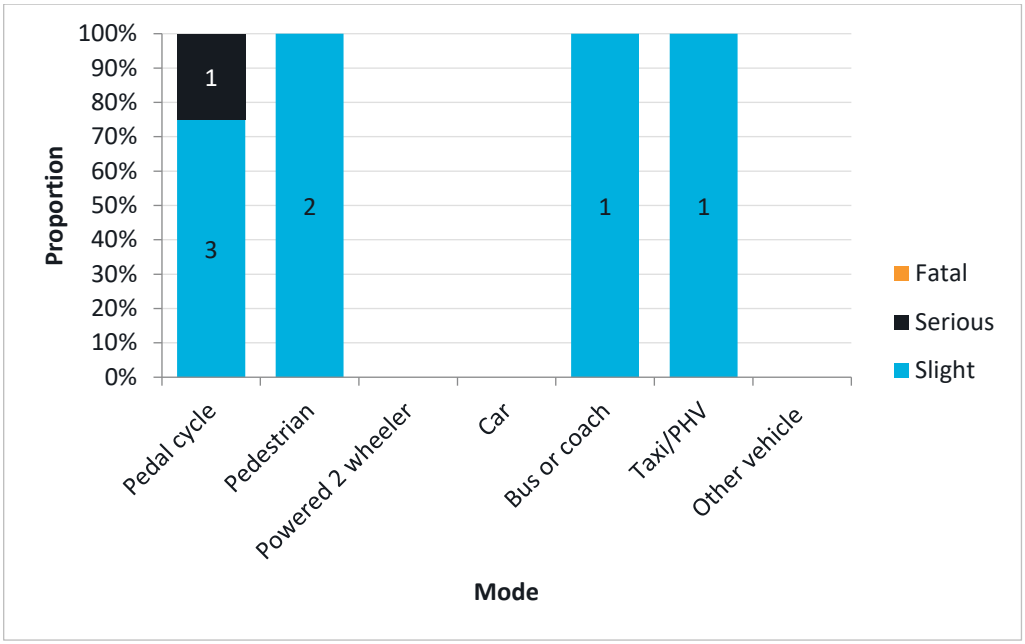
2.16 Based on 2020-2022 STATS19 data, there were 462 casualties across the whole of CoL between 07:00 and 19:00 Monday to Friday associated with vehicle collisions, which are broken down by vehicle type in **Figure 2.10**. At Bank junction, there were 12 casualties between 07:00 and 19:00 Monday to Friday associated with vehicle collisions, these are broken down by vehicle type in **Figure 2.11**.

Figure 2.10: Proportion of casualties for City of London by vehicle type Monday to Friday 07:00 – 19:00



Source: STATS19 2020-2022

Figure 2.11: Proportion of casualties for Bank junction by vehicle type Monday to Friday 07:00 to 19:00



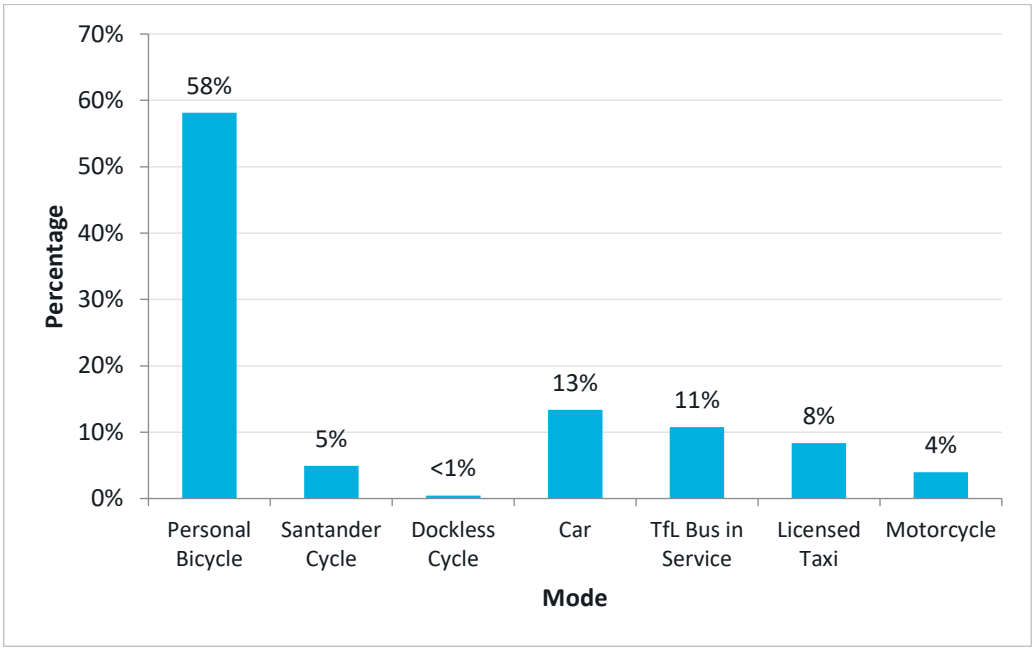
Source: STATS19 2020-2022

Mode share

2.17 A traffic count was undertaken at Bank junction in 2019. This counted all vehicle movements, excluding pedestrian movements. During these timeframes, 14,351 movements were recorded. **Figure 2.12** shows a breakdown of selected modes that may have an impact certain on people who share one or more protected characteristics.

2.18 Based on movements only, with the Bank on Safety scheme in place, cyclists account for most movements (8,706), followed by private car (1,832), in service TfL buses (1,478) and licensed taxis (1,146). Please note that these are vehicle movements and not the total number of passengers. These movements are shown by arm in **Table 2.1**.

Figure 2.12: Bank on Safety traffic counts (5:00-10:00 and 16:00-21:00) – Passenger modes that may affect certain protected characteristics



Source: Data from Tracsis Junction Turning Count Data, Bank on Safety (November 2019).

Note: This figure excludes non-passenger modes.

Table 2.1: Bank on Safety traffic counts (5:00-10:00 and 16:00-21:00) by junction arm - Selected modes that may affect certain protected characteristics

Junction Arm	Cyclists	In Service TfL Buses	Licensed Taxis	Private Car
Princes Street	1,881	196	165	311
Poultry	841	171	163	90
Queen Victoria Street	1,549	142	312	412
Lombard Street / King William Street (KWS)	2,772	570	184	491
Cornhill	807	142	107	236
Threadneedle Street	853	305	215	290

Source: Tracsis Junction Turning Count Data, All Change at Bank (November 2019).

Note: This figure excludes modes that are not expected to have an impact on protected characteristics (ex. LGV, HGV). Please note these are vehicle movements and not the total number of passengers.

2.19 Pedestrian counts from the Bank on Safety project in 2018[4] show approximately 59,000 and 54,000 pedestrian movements in the AM (8:00-9:00) and PM (17:00-18:00) peak periods, respectively. The same study counted 2,200 cyclist movements in the AM Peak (8:00-9:00). **Figure 2.13** shows the locations and counts of pedestrian movements while **Figure 2.14** shows the existing pedestrian comfort levels as of November 2018.

2.20 In both the AM and PM peak periods, the highest single flow occurred on Princes Street while the highest two-way flow occurred on the southern footway of Mansion House Street. The

[4] Bank on Safety – Pedestrian and Cyclist Movement Update, City of London (November 2018).

highest level of informal crossing in both the AM and PM peaks occurred at the Queen Victoria arm between the southern footway of Mansion House Street and Walbrook.

Figure 2.13: Pedestrian Counts AM Peak 8AM-9AM (top) and PM Peak 5PM-6PM (bottom)

Source: Bank on Safety – Pedestrian and Cyclist Movement Update, City of London (November 2018)

Figure 2.14: Pedestrian comfort levels

2.21 The traffic and pedestrian counts demonstrate that Bank junction is used most by pedestrians, and when looking at vehicle movements, this is followed by cyclists, private car, TfL bus services and licensed taxis. Currently, we do not have exact bus passenger numbers. This demonstrates that the pedestrian priority measures that have been implemented at Bank junction will benefit the people who use the junction most (pedestrians and cyclists) by providing a safer journey, better air quality, and improved pedestrian experience.

2.22 A more recent traffic count was undertaken in November 2022. This recorded that cyclists were the largest proportion of vehicles through Bank junction between the combined peak hours of 7am to 10am and 4pm to 7pm (6 hours in total), with 6,248 cycles recorded. 52,075 'designated crossing' movements were made by pedestrians, with a further 12,526 informal crossing movements undertaken by pedestrians. This demonstrates that there has been a reduction in the number of people walking and cycling at Bank junction in comparison to 2019, however, this is likely due to the impacts of travel due to the COVID-19 pandemic[5].

Age

2.23 Based on 2021 Census data, CoL has approximately 8,600 residents, 55 per cent of these being male and 45 per cent being female. Residents most commonly fall into the 25-34 and 35-49 age groups for both genders. When compared to Greater London, CoL has proportionately more people aged between 25 and 69 living in the Square Mile. Conversely there are fewer young people[6]. People aged over 65 represent 14 per cent of the residential population.

2.24 2011 Census data focusing on the workforce in CoL shows that the majority of workforce ages again fall within the 25-29 and 30-34 age categories for both genders, making up 39 per cent of the total workforce. Those aged between 16 and 24 only make up 9 per cent of the workforce population. It can also be noted that as age increases, there is a steady decrease in

[5] Committee Report Template (cityoflondon.gov.uk)

[6] City of London Resident Estimates and Projections

the proportion of the workforce within each age category. The age categories of 60-64 and 65+ represent 2 per cent and 1 per cent of the workforce population, respectively.

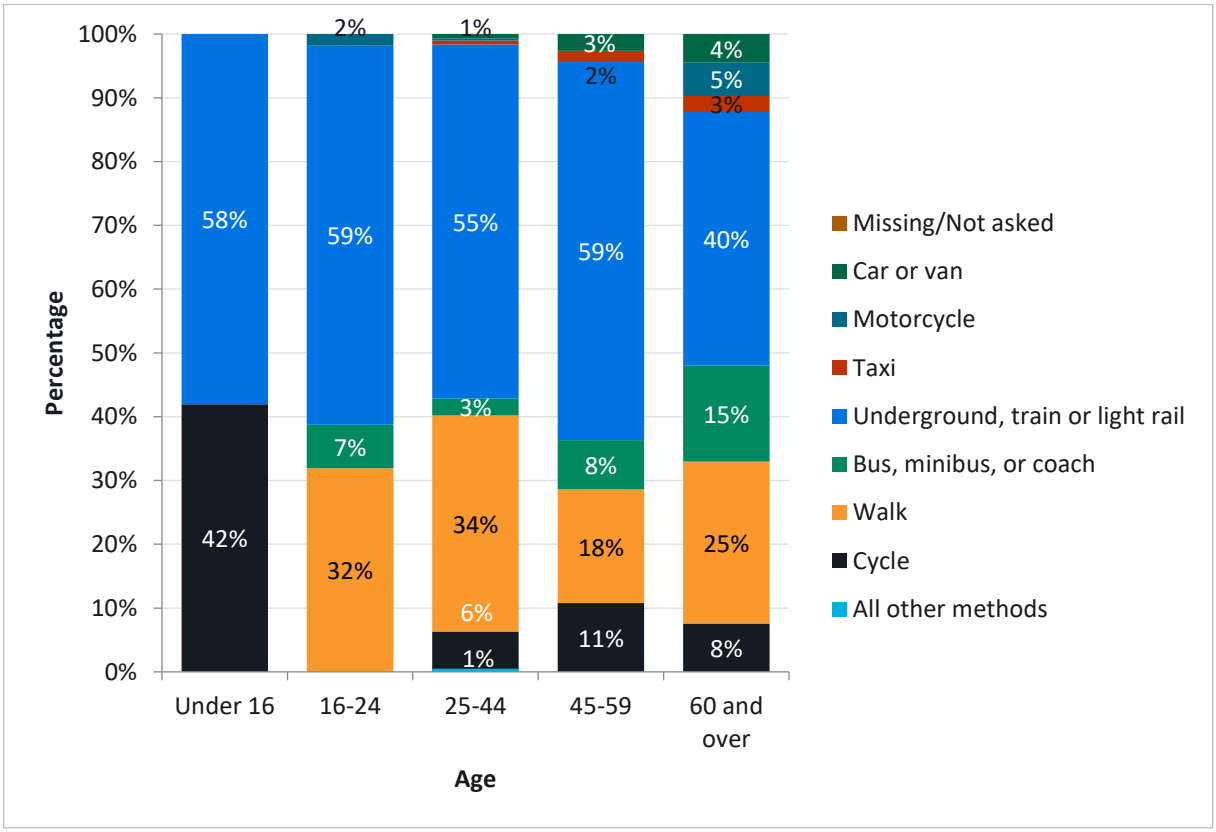
2.25 The 2011 Census data for each age category shows that 78-85 per cent of the workforce relies on public transport to travel to work. The lowest percentage of people driving a car or van falls within the 25-29 age category (2 per cent) and steadily increases as age increases. This proportion also is also slightly higher for the 20-24 (3 per cent) and 16-19 (5 per cent) age groups. A disproportionately high percentage of those aged 65 to 75 rely on driving a car or van (11 per cent) to travel to work. Generally, as age increases, reliance on driving a car or van to travel to work increases.

2.26 The highest proportion of cyclists (5 per cent) are within the 25-29 and 30-34 age categories. Cycling as a mode share decreases with age, falling to 1 per cent by the age of 60 onwards. The proportion of people who walk to work falls within the younger age categories from 16 to 34 (ranging between 5 per cent and 8 per cent). The proportion of walkers remains steady at 3 per cent from age 35 to 64 and increases slightly to 4 per cent for those aged 65 to 74.

2.27 As age increases, people are more likely to develop impairments relating to sight, hearing, and mobility, therefore those above the age of 65 are more likely to be disproportionately affected by these potential impairments, though the absolute number of both residents and workforce fitting this description is expected to be quite low.

2.28 LTDS 2019/20 analysis for trips made for all purposes ending in CoL shows the following mode shares, **Figure 2.15**, per age category.

Figure 2.15: Mode split by age category for travel to the City of London

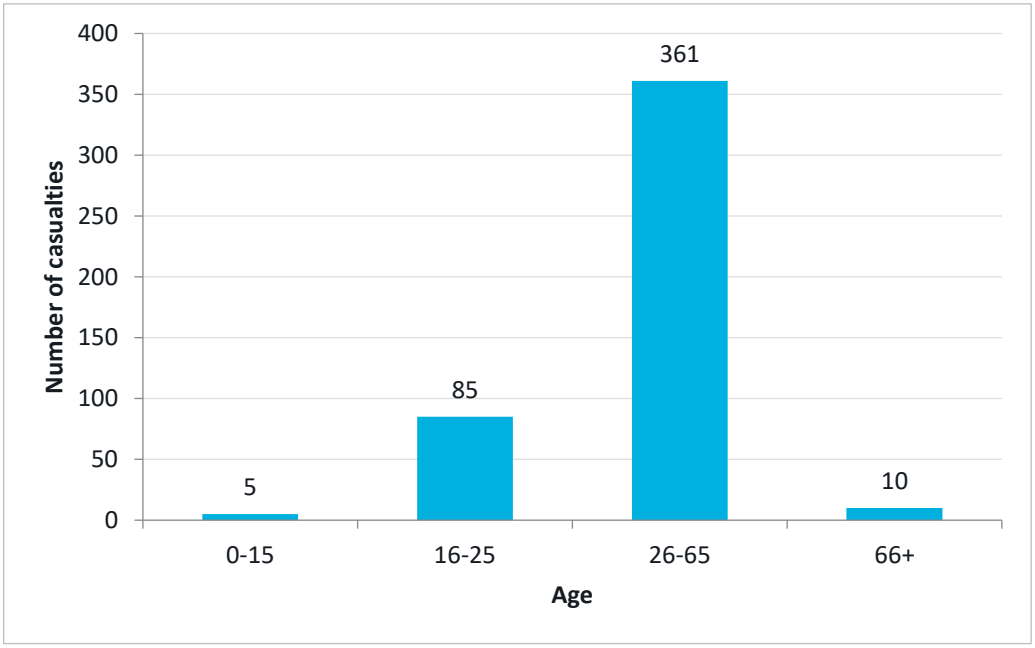


Source: LTDS 2019/20

2.29 Those aged 16-24 and 25-44 have a higher mode split for walking compared to the baseline. Those aged 0 to 15 have higher cycling use. Those aged over 60 show a higher proportion of bus use, and a lower proportion of Underground or other rail mode use. The majority of all other age groups use the Underground or other rail modes.

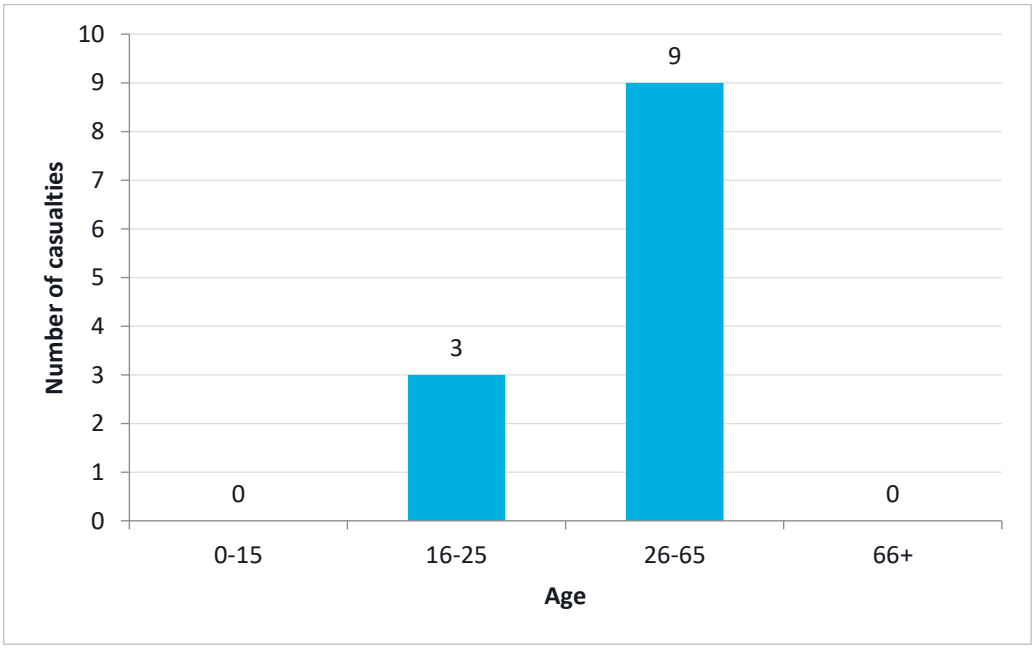
2.30 **Figure 2.16** shows collision casualties by age category. It can be seen that compared to CoL as a whole, those aged 16-24 and those aged 60+ account for a slightly higher proportion of casualties at Bank junction, at 22 per cent and 11 per cent, respectively.

Figure 2.16: Age of casualties involved in collisions, CoL



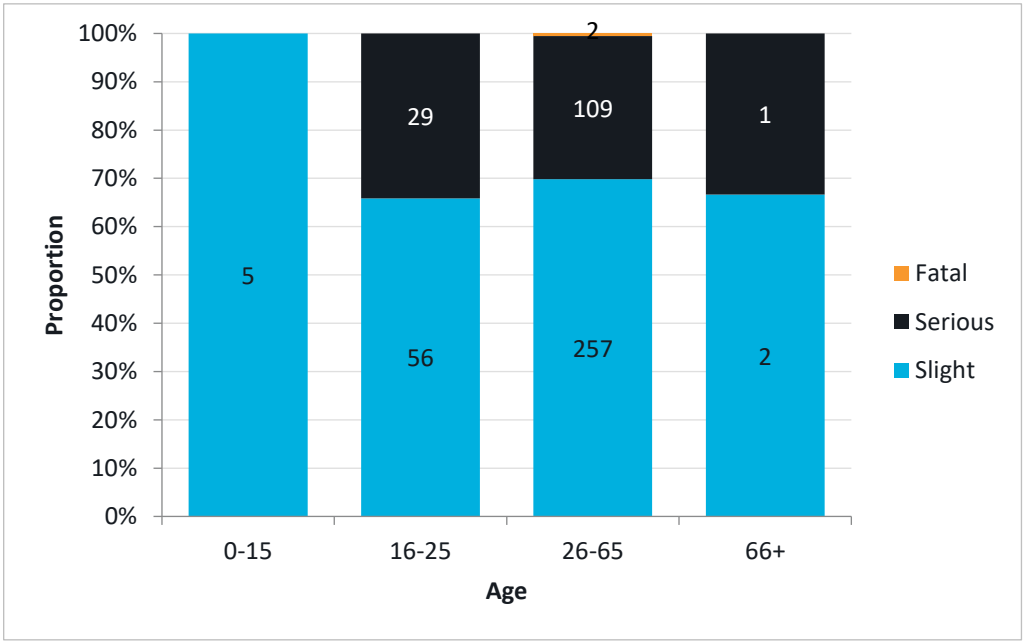
Source: STATS19 2020-2022

Figure 2.17: Age of casualties involved in collisions, Bank junction



2.31 The proportion of KSI and Slight casualties per age category in CoL is shown in **Figure 2.18** below. On average across all age groups, KSIs account for 32.5 per cent of all casualties involved in collisions from 2020-2022 in CoL. Based on this, KSIs are higher than average for those age 60+ (33.3 per cent) and those aged 26-59 (34.1 per cent). This indicates that these age groups are more likely to suffer more severe consequences if they are a casualty in a collision.

Figure 2.18: Proportion of KSI and Slight casualties involved in collisions per age category, in CoL



Source: STATS19 2020-2022

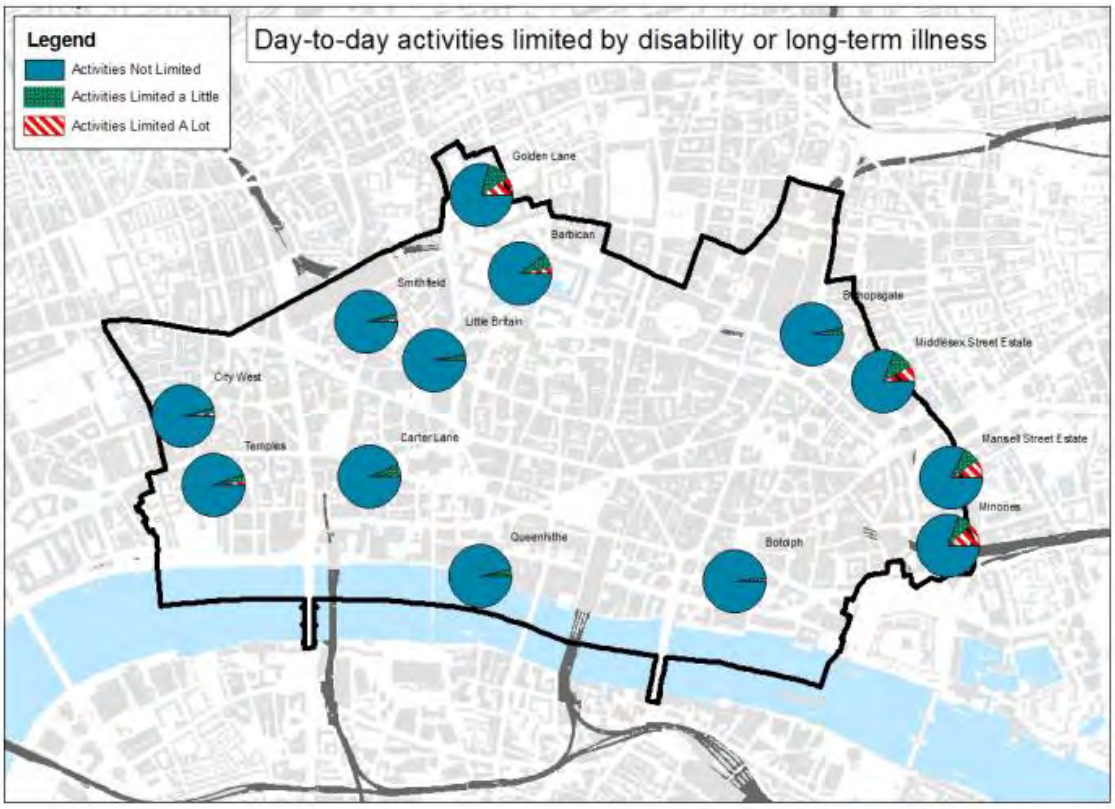
Disability

2.32 Day-to-day activities can be limited by disability or long-term illness. According to 2021 Census data, in CoL as a whole 89 per cent of residents feel they have no limitations in their activities – this is higher than both in England and Wales (83 per cent) and Greater London (87 per cent). In the areas outside the main housing estates, around 95 per cent of residents responded that their activities were not limited. 11 per cent of CoL's residential population stated that they were either in fair, bad or very bad health.

2.33 The spatial distribution of health-based activity limitations can be seen in **Figure 2.19** based on Census data[7]. Generally, areas to the east of CoL and north of CoL are more likely to have activities limited by disability or long-term illness.

[7] https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics

Figure 2.19: Day-to-day activities limited by disability or long-term illness



Source: 2011 Census

2.34 1.7 per cent of the residential population in the CoL are blue badge holders, which makes the CoL one of the five local authorities with the lowest number of Blue Badges across the United Kingdom[8].

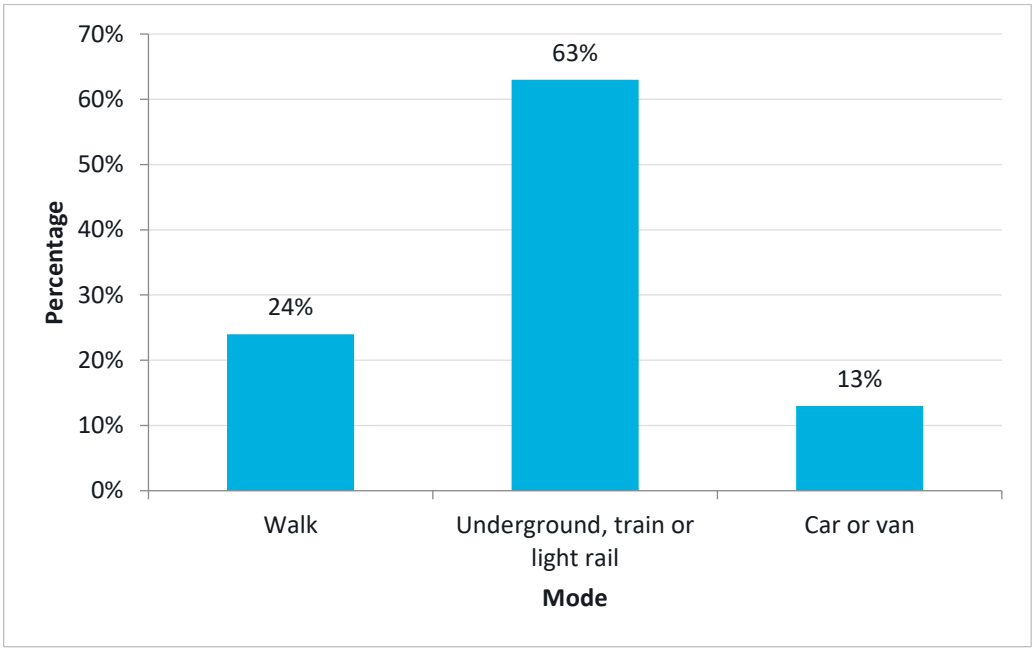
2.35 Across the UK focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey[9] shows that 72 per cent of disabled cyclists use their bike as a mobility aid, and 75 per cent found cycling easier than walking. Survey results also show that 24 per cent of disabled cyclists use a bike for their job or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

2.36 LTDS 2019/20 analysis shows that 1.3 per cent of trips made into CoL are made by someone who has a mental or physical disability affecting daily travel (including old age). The mode split for these trips is shown in **Figure 2.20**.

8 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759944/blue-badge-scheme-statistics-2018.pdf

9 Wheels for Wellbeing Annual Survey 2018: https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf

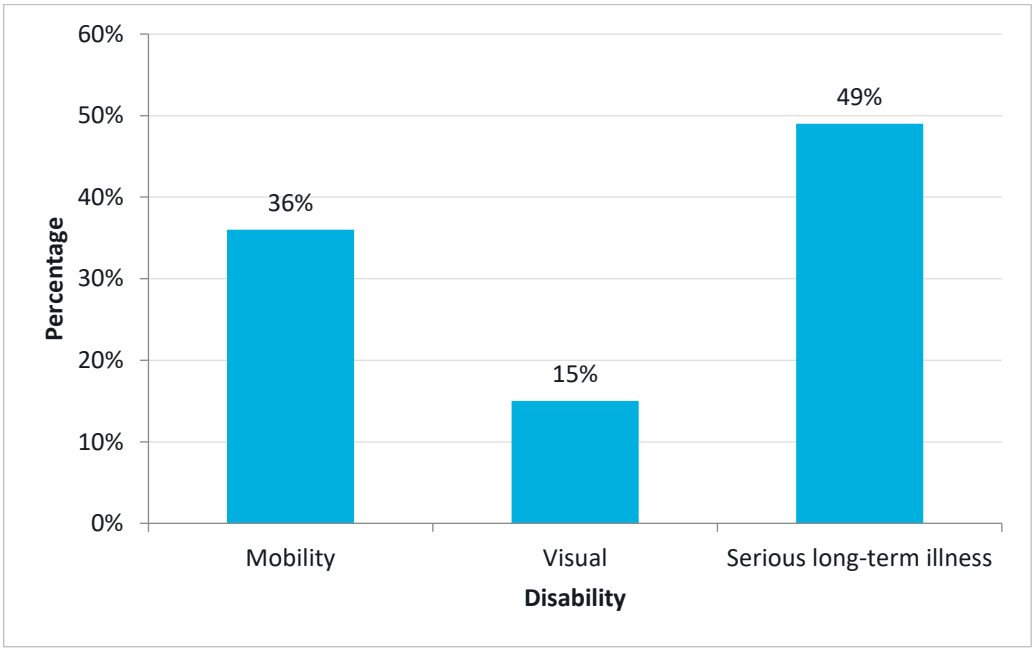
Figure 2.20: Mode split by people with a physical or mental disability affecting daily travel to the City of London (including old age)



Source: LTDS 2019/20

2.37 When comparing to the LTDS mode split of trips made by all people, underground or other rail mode use for disabled people is higher (63 per cent compared to 55 per cent), car trips are significantly higher (13 per cent compared to 1 per cent) and walking is lower (24 per cent compared to 30 per cent). Disability types stated by those who have a disability affecting daily travel (including old age) are shown in **Figure 2.21** below.

Figure 2.21: Disability types stated by those who have a disability affecting daily travel to the City of London



Source: LTDS 2019/20

2.38 It can be seen that impairment due to serious long-term illness represents the highest proportion followed by mobility impairment. It should be noted that this data is based on a very small sample (1.3 per cent of sample size for trips ending in CoL), therefore results should be taken as general. It is important to note that various physical and mental impairments can lead to travel limitations.

Pregnancy / maternity

2.39 The birth rate in CoL was 7.0 births per 1000 people in 2021, approximately 50 per cent below the national average that year of 10.5. Therefore, there are statistically less likely to be pregnant or newly postnatal people who reside in CoL. However, this represents only the residents of CoL, not the 615,000 people who work in the Square Mile, and CoL is principally a working population. A proportion of this workforce will be pregnant and/or have infants or small children at any point in time.

2.40 Considering that the residential population of CoL is quite small, it is unlikely that there will be a significant number of pregnant women and parents with infants and/or small children residing in CoL at any given time. However, the numbers of pregnant women or parents with infants and/or young children that travel in and out of CoL for work or leisure purposes may be higher.

Race

2.41 64 per cent of CoL's residential population hold a UK passport and 16 per cent hold non-European passports. When looking at race per area in CoL, 79 per cent of the residential population is 'White'. There is a higher proportion of Asian population (47 per cent) on Mansell Street, to the east of the study area, when compared to other areas in CoL while the Asian population across CoL is 17 per cent[10].

2.42 The Asian population is approximately evenly split between Asian-Indian, Asian-Bangladeshi, Asian-Chinese and Asian-Other. CoL has the highest and second-highest population of Asian-Chinese in Greater London and England/Wales respectively. The 'Black' population is low compared to Greater London and England/Wales at 2.6 per cent. The remaining population identifies as mixed ethnicity (4 per cent) or other.

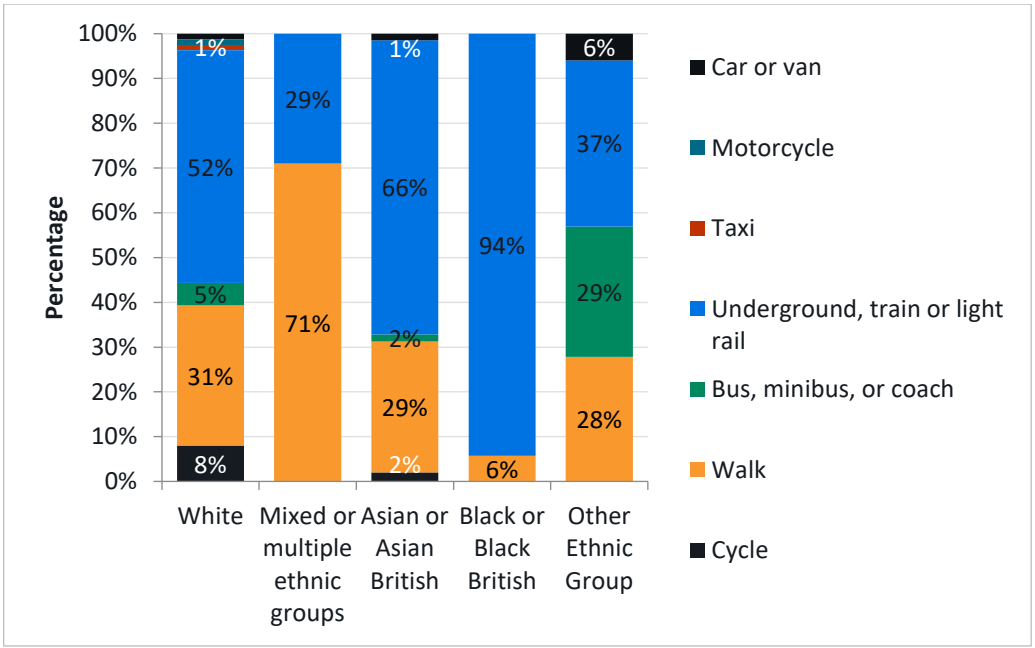
2.43 TfL data, for Greater London, shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65 per cent compared with 56 per cent of white Londoners who use the bus at least once per week. Black Londoners using the bus at least once per week is significantly higher at 73 per cent[11].

2.44 Mode split by ethnicity, based on LTDS 2019/20 analysis is shown in **Figure 2.22**.

[10] **https://www.cityoflondon.gov.uk/services/planning/planning-policy/employment-and-population-statistics**

[11] **http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf**

Figure 2.22: Mode split by ethnicity



Source: LTDS 2019/20

2.45 Based on average travel modes to CoL from the 2019/20 LTDS data, Other Ethnic Groups are more likely to use public buses (29 per cent). Other Ethnic Groups are also more likely to drive (6 per cent). White people are more likely to cycle (8 per cent). Mixed Multiple Ethnic groups are much more likely to walk (71 per cent), while Black or Black British people and Asian or Asian British people are much more likely to use the underground or other rail modes (94 per cent and 66 per cent, respectively). Again, it should be noted that these percentages may not be precise due to low sample sizes.

3 Impact on Bank junction movements

Introduction

3.1 This section outlines the overall impact on vehicular and pedestrian movements at Bank junction and the impact of the scenarios outlined below:

- Scenario 1: Buses, cycles, and taxis
- Scenario 2: Buses, cycles and powered two wheelers (P2Ws)
- Scenario 3: Buses, cycles, taxis and P2Ws

3.2 A fourth scenario, including "buses, cycles, and all motor traffic", was initially considered and analysis of this was included in the February 2023 EqIA. However, following further analysis of this option, Committee decided not to take it any further. Therefore, it has been excluded from this update to the EqIA.

3.3 Consideration is given as to how the proposed design would impact movement for the following users:

- Pedestrians
- Cyclists
- Buses
- Taxis (black cabs – Private Hire Vehicles such as Uber are classified as general motor traffic)
- General motor traffic

3.4 In each scenario, it has been assumed that motor vehicles can access the same arms of the junction that buses and cycles can under the current scheme. These are Cornhill, King William Street/Lombard Street, Poultry and Princes Street.

3.5 To inform this impact assessment, the scenarios have been initially modelled within VISSIM by consultants Norman Rourke Pryme to test their potential impact on bus and general motor traffic journey times in accordance with the current stage of scheme design. A summary of this modelling is included within this chapter.

3.6 It should be noted that this initial modelling conducted by Norman Rourke Pryme relates to initial feasibility. The forecasted impacts are subject to change on refinement and finalisation of the proposals as more detail becomes available, and any mitigation measures introduced.

Existing Bank junction layout

3.7 At present, there are restrictions for motor traffic (except buses) through Bank junction Monday to Friday, during the hours of 7am to 7pm:

- **Lombard Street/King William Street**: bus and cycle access only, Monday to Friday, 7am to 7pm.
- **Poultry**: bus and cycle access only, Monday to Friday, 7am to 7pm. Taxis may access the new taxi rank outside the Ned hotel, but must U-turn during the restricted hours.

- **Princes Street**: (northbound) bus and cycle access only.
- **Princes Street**: (southbound) compulsory left turn into Cornhill at all times, except bus and cycles.
- **Cornhill**: (westbound) bus and cycle access only, Monday to Friday, 7am to 7pm.
- **Queen Victoria Street**: Only cycles can enter or exit onto Mansion House Street at all times.
- **Threadneedle Street**: cycle access only, at all times, between the junction and Bartholomew Lane

Scenario 1: Buses, cycles, and taxis

Pedestrians

3.8 Movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of taxis will increase the overall traffic through Bank junction which may make it more difficult for some people to informally cross the road.

Cyclists

3.9 As with pedestrians, cyclists would not have any restrictions imposed on their movements. However, the introduction of taxis will increase the overall traffic through Bank junction which may reduce real or perceived road safety.

Buses

3.10 In Scenario 1, wherein only buses, cycles and licensed taxis would be permitted through Bank junction, several bus routes would experience notable increases in their AM and PM peak journey times.

3.11 Southbound routes will experience small increases in the AM peak and more substantial increases in the PM peak. The northbound routes would experience journey time increases in the PM peak only.

3.12 The above results show that taxis passing through Bank junction will have a moderately negative impact on bus journey times for specific services travelling along Princes Street and King William Street.

Taxis

3.13 Under the current scenario taxis can collect and drop off passengers on all arms of Bank junction, however, cannot drive through the junction during 7am-7pm Monday to Friday. This could mean some taxis are less likely to travel into the Bank junction area to ply for hire.

3.14 In Scenario 1, taxis would be able to more easily pick up and drop off passengers in and around Bank junction and would be able to ply for hire more easily around and within the junction.

General motor traffic

3.15 General motor traffic would not be allowed through Bank junction in this scenario.

3.16 Modelling outputs shows that in both the AM and PM peak hours, most general traffic journey times along the alternative key routes are negligible compared to the baseline situation. There is generally a slight improvement in journey times due to some taxis being removed from routes around Bank junction and reassigning to pass through Bank junction.

Scenario 2: Buses, cycles, and P2Ws

Pedestrians

3.17 Movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of P2Ws will increase the overall traffic through Bank junction which may make it more difficult for some people to informally cross the road and therefore may reduce real or perceived road safety.

Cyclists

3.18 As with pedestrians, cyclists would not have any restrictions imposed on their movements. However, the introduction of P2Ws will increase the overall traffic through Bank junction which may reduce real or perceived road safety.

Buses

3.19 In Scenario 2, all bus routes would experience negligible changes to their AM and PM peak journey times. The impact of powered two wheelers on bus journey times therefore is unlikely to be significant.

Taxis

3.20 In Scenario 2, there would be no change from the current restrictions experienced by taxis. They would continue to able to collect and drop off passengers on all arms of Bank junction, however they cannot drive through the junction during 7am-7pm Monday to Friday, and therefore, some taxis are less likely to travel into the Bank junction area to ply for hire.

General motor traffic

3.21 The changes to the general traffic journey times for Scenario 2 are mostly negligible. This is because the impact of motorcycles on the highway network tends to not be significant due to their ability to move between vehicles and bypass queues. They also take up less space on the road than a car or larger vehicles.

Scenario 3: Buses, cycles, taxis, and P2Ws

Pedestrians

3.22 In Scenario 3, the movement of pedestrians between or through any of the junction arms will not be restricted in any way, however the introduction of taxis and P2Ws will further increase the overall traffic through Bank junction which is likely to make it more difficult for some people to informally cross the road.

3.23 This scenario is likely to decrease real or perceived road safety for pedestrians due to the increased access and likely increase in traffic volume.

Cyclists

3.24 In Scenario 3, cyclists would not have any restrictions imposed on their movements. However, the introduction of taxis and P2Ws will increase the overall traffic through Bank junction which may reduce real or perceived road safety.

3.25 This scenario is likely to have a more significant impact on real or perceived road safety for cyclists due to the increased access and likely increase in traffic volume.

Buses

3.26 In Scenario 3, a similar pattern of results to Scenario 1 emerges. Southbound bus routes all experience a relatively large journey time increases in the AM peak, with this exacerbated in the PM peak. Journey times are increased slightly further from Scenario 1 due to the addition of powered two wheelers passing through Bank junction.

3.27 Some northbound routes would have reduced journey times in the AM peak, which is likely due to some congestion along its route being alleviated by the re-routing of traffic through Bank junction.

Taxis

3.28 Under the current scenario taxis can collect and drop off passengers on all arms of Bank junction, however, cannot drive through the junction during 7am-7pm Monday to Friday. In Scenario 3, taxis would be able to more easily pick up and drop off passengers around Bank junction and would be able to ply for hire more easily around the junction.

General motor traffic

3.29 The results for Scenario 3 are very similar to Scenario 1. This shows that the impact of powered two wheelers and taxis passing through Bank junction do not have a significant impact on journey times for general traffic.

4 Impacts on equality

Introduction

4.1 This chapter considers the equality impacts of the potential change to traffic restrictions through Bank junction, and their potential to have disproportionate impact(s) upon equalities – both positive and negative. Recommended mitigations are also provided for any potential disproportionately negative impacts.

4.2 Where taxis are discussed, for the purposes of assessing the demographics of drivers, a distinction is made between taxis (black cabs) and Private Hire Vehicles (PHVs). Taxis would be permitted to drive through Bank junction in Scenarios 1 and 3 between 7am to 7pm.

Age

Context

4.3 According to the Kings College London 2016 report "An Age Friendly City – how far has London come?"[12], there is significant crossover between older Londoners and disabled Londoners. For example, almost half of those aged 65-69 report having a physical disability (46 per cent). Therefore, mobility issues in accessing public transport are likely to be particularly relevant for those aged 60+.

4.4 Young people are most likely to either walk or use the bus, in part because these are generally lower cost modes than the London Underground. The Greater London Authority (GLA)'s 'Equality, diversity and inclusion evidence base for London' 2019 report[13] shows that 49 per cent of 16-24-year-old Londoners cite cost of tickets as a barrier to using public transport more often, compared to less than 10 per cent of those aged 65+.

4.5 This may also be reflected in the demographics of those cycling within London. According to the GLA's report, younger people are the most likely to cycle. A 2016 TfL survey showed that 82 per cent of Londoners who cycled in the past year were under the age of 45, with just 18 per cent over 45. Reducing he volumes of motor traffic will improve conditions for cycling, benefitting young people.

Impact assessment

4.6 **Road safety:** Scenario 3 reduces road safety benefits which pedestrians and cyclists have experienced under existing restrictions, as increasing these scenarios would increase the number of motor vehicles moving through the junction. This is likely to disproportionately impact those aged 65+, as a third of trips made by this age group are by walking (higher than

[12] **https://www.london.gov.uk/sites/default/files/an_age_friendly_city_report.pdf**

[13] **Equality, Diversity and Inclusion Evidence Base for London - London Datastore**

for any other age group) and those aged 60+ also have a higher-than-average likelihood of being killed or seriously injured if involved in a collision within CoL.

4.7 **Walking and cycling:** According to LTDS 2019/20 data for CoL, the proportion of trips made by the 65+ age group in CoL by walking (25 per cent) and cycling (8 per cent) outweighs the proportion using private cars (4 per cent). 32 per cent of younger people aged 16-24 travel to CoL by walking. Therefore, Scenario 3 is likely to negatively impact both older and younger people who primarily walk and cycle, as increases in volumes of motor traffic is likely to have an impact on real or perceived road safety.

4.8 **Air quality:** People of young and old age are more vulnerable to poor air quality[14]. For young children negative air quality can lead to reduced lung development and for the elderly this can lead to a range of long-term health problems. Therefore Scenario 3, which would increase the volumes of motor traffic through Bank junction is likely to disproportionately negatively impact these age groups through the resulting likely decreased air quality.

4.9 **Driving:** 11 per cent of people aged 65 to 75 living in CoL drive a car or van to work, based on 2011 Census data. No scenario listed would allow access to general motor traffic, and therefore this may disproportionately impact those who rely on this mode, prohibiting them to pass through Bank junction where they previously may have taken a direct route.

4.10 All three scenarios would increase the number of vehicles through Bank junction and would subsequently disbenefit younger people. This is because increased volumes of motor traffic may have real or perceived road safety for pedestrians and cyclists. This is likely to be most pronounced in Scenario 3, as permitting general motor traffic could result in a higher number of vehicles travelling via Bank junction.

4.11 **Public transport:** As outlined in the **Technical Note: Analysis of Additional Datasets,** 'Freedom Pass Elderly' Oyster Card types have the second highest proportion of usage throughout the day, for journeys that start at bus stops in the Bank junction area. Use of this ticket type is highest (9.9 per cent) during the interpeak time (10:00 – 16:00). LTDS 2019/20 data highlights that 15 per cent of people aged 60 and over travel by bus in CoL. Therefore, Scenario 3 is likely to negatively impact older people who use public transport, as increased volumes of motor traffic would have a direct impact on bus journey times.

4.12 In addition, TfL research from 2019 shows that bus-use is the next most commonly used transport type for younger Londoners (after walking and cycling). Among Londoners aged 11-15, 75 per cent use the bus at least once a week, compared with 59 per cent of all Londoners. Therefore, Scenario 1 and particularly Scenario 3 would be likely to negatively impact younger people who use public transport, as increased volumes of motor traffic would have a direct impact on bus journey times.

4.13 **Taxi drivers:** Taxi and PHV demographic statistics from December 2022 show that 17 per cent of PHV drivers in London are over the age of 55 and 50 per cent are under the age of 46. 41 per cent of licensed taxi drivers over the age of 57 and 21 per cent are under the age of 48[15]. Scenarios 1 and 3 would provide access to Bank junction for licensed taxis but not PHVs,

[14] **https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf**

[15] Age bands are not the same between the two groups.

therefore that the benefits of accessing Bank junction would not be extended to the disproportionately younger drivers of PHVs.

4.14 **Taxi usage:** All licensed taxis are required to be fully wheelchair accessible and obliged to carry any person who may require mobility assistance (without additional charge)[16]. Scenarios 1 and 3 would allow taxis to pass through Bank junction during 7am to 7pm which is likely to benefit older people who rely on taxis as an essential method of transport. This can be especially beneficial for time-sensitive trips, such as attending medical appointments, which are more common for disabled people, older people, and pregnant women.

Disability

Context

4.15 As part of the design and public consultation and accessibility engagement period for the original All Change at Bank scheme, CoL worked alongside Transport for All (TfA). TfA are a pan-impairment disabled-led group that strives to increase access to transport across the UK.

4.16 TfA facilitated several meetings with disability groups and individuals with various levels of accessibility to discuss the proposals and provide comments for us to consider. Meetings took place with Royal National Institute of Blind People, Guide Dogs, Alzheimer's Society and Wheels for Wellbeing. Individuals with varied accessibility needs took part in four workshops, including members of City of London Access Group and the Bank of England Disability Staff Network.

4.17 The concerns raised within the consultation survey regarding the need for taxi access for disabled people did not dominate the workshops discussion or responses, although there were questions relating to additional wheeling / walking distances that would result for the restrictions. The proposals were assessed through the CoL's Street Accessibility Tool to help inform the detail design.

4.18 Focusing solely on cyclists who have a disability, the Wheels for Wellbeing annual survey[17] shows that 65 per cent of disabled cyclists use their bike as a mobility aid, and 64 per cent found cycling easier than walking. Survey results also show that 31 per cent of disabled cyclists' cycle for work or to commute to work and many found that cycling improves their mental and physical health. Inaccessible cycle infrastructure was found to be the biggest barrier to cycling.

4.19 Transport for All's (TfA) 'Pave the Way' Report shows that walking is the primary mode of travel for blind and partially sighted people, who have reduced transport alternatives available to them. TfA's research shows that nearly 90 per cent of blind and partially sighted respondents interviewed said that being able to make walking journeys independently, without a sighted guide was important or very important to them.

Impact assessment

4.20 **Walking:** Walking is the second highest mode share (24 per cent) for people with a physical or mental disability who travel into the CoL. Scenarios that increase the volumes of motor traffic

[16] In relation to Sections 165 and 164a of the **Equality Act 2010**

[17] Wheels for Wellbeing Annual Survey 2019: **https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf**

through Bank junction is likely to negatively impact disabled people that walk. This is because increased vehicle movements may impact real or perceived road safety.

4.21 **Taxi usage:** All licensed taxis are required to be fully wheelchair accessible and obliged to carry any disabled person who may require mobility assistance (without additional charge)[18]. Scenarios 1 and 3 would allow taxis to pass through Bank junction during 7am to 7pm which is likely to benefit disabled people who rely on taxis as an essential method of transport. This can be especially beneficial for time-sensitive trips, such as attending medical appointments, which are more common for disabled people, older people, and pregnant women.

4.22 In the February 2023 EqIA, it was suggested that this may result in more direct journeys and shorter journey times for some trips and could decrease the cost associated with those trips for the user as a result. As outlined in the **Technical Note: Analysis of Additional Datasets**, cost and journey time benefits are varied, and depend on the passenger origin and destination. This is because only some routes that travel via Bank junction have cost and/or time savings in comparison to the second most direct route. Depending on passenger origin and destination, routes that avoid Bank may instead provide cost or journey time savings. In addition, it should also be noted that, in Scenarios 1 and 3, the likely increased volumes of traffic using the Bank junction area may limit any positive impact.

4.23 In the February 2023 EqIA it was considered that in Scenarios 1 and 3, where taxi access is permitted through Bank junction, there was likely to be an increased circulation of taxis in the area, and therefore increased likelihood of accessing taxis (reduced wait times) for those who rely on taxis as a mobility aid. The greater circulation and visibility of taxis is likely to also limit walking distances for those hailing taxis in the area. However, as outlined in the **Technical Note: Analysis of Additional Datasets,** taxi availability in the Bank area under the motor restrictions currently in place is proportionate and comparable to the wider trends in taxi availability across CoL, and across London. As such, it can be considered that this potential impact may not be experienced in a disproportionate way.

4.24 **Personal assistants:** Disabled people may rely upon family members, friends or professional assistants for daily care. The 2011 Census indicates that over 687,000 Londoners spend at least an hour a week caring for someone – equivalent to 8.5 per cent of the population[19]. It is likely that some personal assistants travel to, or via Bank junction. No data is available on the mode share of personal assistants; however, it is unlikely that this varies significantly from the method of travel to the CoL for all purposes, which is currently 1 per cent driving in a car or van. Scenarios which permit access to general motor vehicle in the area would facilitate access for personal assistants who visit the area in a private car. However, Scenarios 1 and 3 may negatively impact personal assistants who travel via public transport, due to increased bus journey times. Personal assistants who walk or cycle through Bank junction as part of their trip would also likely experience negative impacts on real or perceived road safety, as motor traffic volumes would be higher.

[18] In relation to Sections 165 and 164a of the **Equality Act 2010**

[19] **https://statics.teams.cdn.office.net/evergreen-assets/safelinks/1/atp-safelinks.html**

4.25 **Cycling**: The Wheels for Wellbeing annual survey (2019/20)[20] showed that 65 per cent of disabled cyclists use their cycle as a mobility aid, and 64 per cent found cycling easier than walking. Survey results also show that 31 per cent of disabled cyclists' cycle for work or to commute to work and many found that cycling improves their mental and physical health. All scenarios increase access for vehicle traffic to some extent, but Scenario 3 in particular would see large increases in vehicle access and potentially impact on real or perceived road safety for those that rely on cycling as a mobility aid.

Pregnancy and maternity

Context

4.26 In 2021, the General Fertility Rate (GFR) in City of London and Hackney[21] was 54.1 births per 1,000 women aged 15-44, while the GFR for London was 56 per 1,000 women. This suggests that slightly fewer women of this age group were likely to be pregnant or have given birth in 2021 in CoL and Hackney, compared to the Greater London average.

4.27 Data shows that overall, the number of live births has been gradually falling in City of London and Hackney, and in London as a whole. During this time, the GFR for City of London and Hackney remained consistently below the Greater London average. In 2018, there was a slight increase in the fertility rate in CoL, before continuing to fall, yet it remained below the Greater London rate[22].

4.28 Pregnant and maternal women are more likely to face mobility issues when using public and active modes of transport, whether because of the need to use a buggy and move it around or because of the need to safely manage a young child.

Impact assessment

4.29 **Road safety**: Each scenario increases the volume of through-traffic compared to the existing situation, and this may increase the likelihood of conflict between different road users on the whole. This is relevant to Scenario 3, which allow the highest volumes of motor traffic through the junction. This may create a less safe environment, particularly for pregnant women who may have slower movement associated with their physical condition, particularly in the later stages of pregnancy.

4.30 **Air quality**: There is growing evidence showing that prenatal exposure to air pollution is associated with a number of adverse outcomes in pregnancy[23]. Therefore, in a scenario that would increase volumes of motor traffic (Scenario 3 in particular), an increase in emissions locally may disproportionately negatively impact pregnant women.

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[20] **https://wheelsforwellbeing.org.uk/wp-content/uploads/2020/07/WFWB-Annual-Survey-Report-2019-FINAL.pdf**

[21] City of London has been grouped with Hackney after 2004 in the dataset: **Births and Fertility Rates, Borough - London Datastore**

[22] City of London has been grouped with Hackney after 2004 in the dataset: **Births and Fertility Rates, Borough - London Datastore**

[23] **https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_-_city_of_london.pdf**

4.31 **Taxis**: Licensed taxis provide a fully accessible service, which is likely to be particularly beneficial to pregnant women, especially at later stages of pregnancy. Scenarios 1 and 3 would increase access to taxis to Bank junction which is likely to benefit those pregnant women who rely on taxis as an essential method of transport.

4.32 Similarly, pregnant women who rely on taxis as an essential mobility aid in Scenarios 1 and 3 will be able to pass through Bank junction on their journeys within or through CoL. In the February 2023 EqIA, it was suggested that this may result in more direct journeys and shorter journey times for some trips and could decrease the cost associated with those trips for the user as a result.

4.33 As outlined in the **Technical Note: Analysis of Additional Datasets**, this benefit is only experienced depending on the passenger origin and destination. This is because only some routes that travel via Bank junction have cost and/or time savings in comparison to the second most direct route. Depending on passenger origin and destination, routes that avoid Bank may instead cost or journey time savings. In addition, it should also be noted that, in Scenarios 1 and 3, the likely increased traffic flows through the Bank junction area and the impact on general traffic journey times may limit this positive impact.

4.34 In the February 2023 EqIA it was also suggested that where taxi access is permitted through Bank junction, there is likely to be an increased circulation of taxis in the area and therefore increased likelihood of accessing (reduced wait times) for those who rely on taxis as a mobility aid. The greater circulation may also limit potential walking distances when using taxis in the area. As outlined in the **Technical Note: Analysis of Additional Datasets,** taxi availability in the Bank area under the motor restrictions currently in place is proportionate and comparable to the wider trends in taxi availability across CoL, and across London. As such, it can be considered that this potential impact may not be experienced in a disproportionate way by these road users.

4.35 **Walking and cycling:** There is limited research related to the extent to which pregnant women continue to walk or cycle as their pregnancy progresses, and the extent to which pregnant women use active travel in CoL is unknown. However, studies from wider contexts indicate that some women who used active travel pre-pregnancy continue to use active travel during pregnancy[24,25]. Therefore, Scenario 3 would reduce road safety benefits which pregnant pedestrians and cyclists have experienced under existing restrictions, as increasing these scenarios would increase the volumes of motor traffic moving through the junction.

4.36 **Public transport**: It is likely that some pregnant women either working, residing, or travelling through CoL will also continue to use public transport, however the extent to which this occurs within CoL is also unknown. Scenario 3, which would lead to the largest increase in volumes of motor traffic could disproportionately negatively affect pregnant women by any associated increases in bus journey times, as longer journey times may exacerbate the negative physical and mental symptoms of pregnancy[26].

[24] **https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4730776/**

[25] **https://www.sciencedirect.com/science/article/abs/pii/S2214140516303814**

[26] **https://www.sciencedirect.com/science/article/abs/pii/S2214140521003388**

Race

Context

4.37 TfL data for Greater London shows that bus use among Black, Asian or Ethnic Minorities (BAME) Londoners is higher at 65 per cent compared with 56 per cent of white Londoners who use the bus at least once per week. Black Londoners using the bus at least once per week is significantly higher at 73 per cent[27].

4.38 The cost of transport is a particular barrier to increased public transport use amongst BAME Londoners with 60 per cent of BAME Londoners saying costs is a barrier compared to 38 per cent of white Londoners[28]. Therefore, changes which help to make transport more affordable or offer improvements to low-cost modes of transport such as walking and cycling may benefit users who identify as being of BAME groups.

Impact assessment

4.39 **Cycling**: All scenarios would increase motor vehicle traffic through the Bank junction area, and this is likely to impact upon real or perceived safety for those groups who have the highest cycling mode share, namely Mixed or Multiple Ethnic Groups. This is most applicable to Scenario 3, which would see the largest increases in volumes of motor traffic. This may also discourage cycling in ethnic groups that are currently less likely to cycle due to the real or perceived safety of cycling alongside motor traffic.

4.40 **Public transport**: BAME groups who have a higher mode share for bus usage, are likely to be disproportionately negatively affected by any increases in bus journey times, particularly in Scenario 3, which would see the largest increase in volumes of motor traffic.

4.41 **Taxi drivers**: Taxi and PHV demographic statistics from December 2022 show that 38 per cent of PHV drivers in London are Asian or Asian British and 15 per cent are Black or Black British (and 32 per cent declined to answer). 64 per cent of licensed taxi drivers are White British (and 17 per cent declined to answer). Scenarios 1 and 2, that permit access through Bank junction for licensed taxis and not PHVs would mean that BAME groups disproportionately miss out on the associated benefits extended to taxi drivers.

Summary

4.42 A summary of the disproportionate positive and negative impacts identified on protected groups is set out by scenario below:

Scenario 1: Buses, cycles, and taxis

4.43 Scenario 1 is likely to have the least negative impact on equalities compared to the other scenarios. 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.

4.44 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,

[27] **http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf**

[28] GLA Intelligence – Equality, Diversity and Inclusion Evidence Base for London

active transport, and road safety, though to a lesser extent than some other scenarios with greater increases in vehicle access.

Scenario 2: Buses, cycles and P2Ws

4.45 Scenario 2 is likely to have limited impact on equalities, the inclusion of P2Ws is unlikely to have a major impact upon traffic or congestion. The 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.

Scenario 3: Buses, cycles, taxis and P2Ws

4.46 Scenario 3 provides greater access to motor vehicles and therefore increases the impacts on equalities. Like Scenario 1, the biggest impact is due to taxi access. This will benefit those who may rely on taxi access, such as older people, those with mobility impairments and pregnant women.

4.47 Conversely, the 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.

5 Summary and conclusion from analysis of additional data

Summary

5.1 The February 2023 EqIA recommended that additional research was undertaken in order to establish the implications that the All Change at Bank scheme has had on taxi availability within the Bank junction area, and therefore the associated impact(s) experienced by people who share one or more protected characteristics.

5.2 This data has since been collected, alongside data to determine taxi journey times and associated costs as a result of avoiding routeing via Bank junction. This data has been analysed in relation to equality impacts and is explored in **Technical Note: Analysis of Additional Datasets**. A summary of these findings is outlined below:

- **Taxi availability:** There has been a decrease in taxi availability in the Bank junction area in comparison to previous years, which can make it more difficult to hail a taxi on the streets leading to Bank junction. However, the scale of the reduction is not unique to the Bank junction area, as the wider CoL and comparative locations have experienced a similar scale of change. Therefore, while people who rely on taxis as an essential mobility aid may find it harder to hail a taxi around Bank junction, is proportionate and comparable to the wider trends in taxi availability across the CoL and London.
- **Taxi and private hire wait times for ride hailing apps:** Wait times for taxis and PHVs that are requested via ride hailing apps are slightly higher in Bank junction. The average wait time for a taxi at Bank was 4 minutes and 11 seconds, in comparison to an average of 4 minutes and 1 second for CoL. This is not considered to be significant.
- **Taxi journey times:** The results showed that the Bank restrictions do not appear to have a significant impact on journey time. Out of eight journey time routes analysed, routes via Bank junction produced the quickest journey on two occasions. This means that not all taxi journeys are being (directly) negatively impacted by the restrictions, and some are benefiting from them.
- **Taxi journey costs:** When all journeys were compared, taxi trips via Bank junction were £0.68 more expensive on average than those which avoided Bank junction. Some routes/journeys however were up to £4.03 more expensive, others were up to £2.23 cheaper.

5.3 In response to concerns that a lack of passive surveillance from passing motor vehicles has negatively impacted crime trends within the Bank junction area, crime data has also been assessed in **Technical Note: Analysis of Additional Datasets**. This analysis 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.

Conclusion

5.4 **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.**

5.5 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.

5.6 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.

5.7 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.

5.8 If any change is made to the existing traffic restrictions at Bank junction, it is recommended this change is implemented on an experimental basis, and that the CoL continues to monitor the scheme's impact through their existing monitoring and evaluation framework. This will provide scope to review the impact of the restrictions on equality, and potentially make amendments to the scheme if the impacts are deemed to be extensive and disproportionate. Furthermore, where possible, engagement with affected taxi users (who rely on taxis as an essential mobility option) through existing channels of communication would allow CoL to gain a deeper understanding of the specific challenges taxi users face and tailor any potential amendments to better address their needs.

A Technical Note: Analysis of Additional Datasets

Technical Note
April 2024

All Change at Bank EqIA Technical Note: Analysis of Additional Datasets

City of London Corporation
23949605

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Technical Note
April 2024

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1 Introduction

Background

1.1 This Technical Note presents analysis which supports the update to the All Change at Bank Equality Impact Assessment (EqIA), produced in February 2023. The February 2023 update to the All Change at Bank EqIA concluded that additional research should be carried out to further understand the potential impacts of restricting taxi access for people who rely upon taxis as essential mobility. Specifically, the February 2023 EqIA recommended a taxi availability survey to better understand the availability of taxis within the area around Bank junction and the associated impact this may have on people who rely upon them as an essential mobility aid. Following this recommendation, additional equality datasets have been created in relation to taxi circulation.

1.2 This Technical Note presents the analysis that has been undertaken on these datasets and also presents further research and literature review in relation to additional equality topics that have been raised in relation to taxi restrictions since February 2023.

1.3 The analysis included in this Technical Note includes:

- **Section 2: A review of comments received by local lobby group "Cabs Across Bank"**: to establish equalities-related concerns that have been raised by taxi passengers and drivers.
- **Section 3: Literature review**: to identify the potential implications of taxi restrictions for protected characteristic groups and people within lower socio-economic status.
- **Section 4: Review of changes in taxi availability and taxi journey time data**: to assess the equality implications related to changes in taxi journey times and routes pre-and-post scheme restrictions.
- **Section 5: Crime data analysis:** to examine changes in crime trends since the introduction of restrictions at Bank junction, and whether changes are disproportionate.
- **Section 6: Review of Oyster Card data**: for bus stops around the Bank junction area to determine bus user profile, and subsequent equality considerations.

1.4 Analysis of these additional datasets has supported the update of the main EqIA.

2 Comments received by Cabs Across Bank

Background

2.1 Cabs Across Bank is a group which is campaigning for Licensed Hackney Carriages to retain access across Bank Junction and other streets in CoL which feature restrictions for motor vehicles. As part of their campaign, Cabs Across Bank have received comments from taxi drivers and passengers regarding their experience of taxi access and operations in CoL.

2.2 Comments received by Cabs Across Bank have been reviewed in relation to equality impact themes, which has informed the analysis of additional datasets.

Methodology

2.3 Approximately 200 responses from taxi drivers and passengers have been reviewed, though this does not comprise the total responses that have been received by Cabs Across Bank. Cabs Across Bank disclosed that, by 25 February 2024, they had received 589 comments from taxi passengers and taxi drivers.

2.4 Cabs Across Bank sifted these responses prior to sharing them and excluded similar responses from the dataset. As such, this analysis comprises a review of equality related themes raised within the responses only and does not indicate frequency of concerns raised by respondents.

2.5 Comments analysed were recorded as being sent to Cabs Across Bank from 27 September 2023 – 25 February 2024.

Analysis

2.6 **Table 2.1** presents the analysis of comments received from Cabs Across Bank. Responses have been categorised into taxi-related themes and their associated comment type. Where responses have indicated a potential impact on a specific characteristic group, these protected characteristics have been listed.

Table 2.1: Themes raised by Cabs Across Bank respondents, and related equality implications

Theme	Comment	Comment references specific Protected Characteristic Group
Taxi Use	Comment that people rely on taxis for essential mobility	• Age (older people) • Disability • Pregnancy and Maternity • Sex
Taxi Availability	Concern that there are fewer taxis available	• Disability • Age (older people) • Sex

Theme	Comment	Comment references specific Protected Characteristic Group
Taxi Availability	Concern expressed about increased difficulty of 'getting around' due to restrictions, including to named locations/destinations	Sex Disability Age (older people)
Taxi Availability	Concern that there is a longer wait time to find a taxi	Sex
Taxi Routes	Concern that taxis are not being permitted to take the shortest routes	Disability Age (older people)
Taxi routes	Concern that people are being dropped further from their desired destination	Disability Age (older people) Sex
Taxi fares	Concern that restrictions are resulting in higher taxi fares	Disability
Safety	Concern that there is reduced safety due to taxis being restricted, e.g. walking in dark, decreased passive surveillance	Sex Age (older people) Disability

2.7 Relevant comments made by respondents indicate equality-related concerns in relation to four protected characteristic groups: Sex, Age (specifically older people), Disability, and Pregnancy and Maternity.

2.8 The themes of concerns raised include decreased taxi availability, increases in time for taxi journeys and longer routes, plus corresponding increases to taxi fares, and decreased safety as a result of less passive surveillance from vehicles. A more general concern that taxi use is relied upon for essential mobility across protected characteristic groups was also raised by respondents. The comments and themes listed above were raised in passenger responses and also by taxi drivers who frequently shared concerns on behalf of passengers. These themes will be considered within the following analysis and have also been considered within the update of the EqIA.

3 Literature Review

Introduction

3.1 To inform the impact assessment, a review of relevant literature was undertaken to establish the various ways in which taxi availability and access can affect people with protected characteristics. This research involved reviewing academic papers, research studies, and demographic data to draw out the ways in which taxi availability could have disproportionate impacts of different groups of people.

Methodology

3.2 Research was primarily undertaken in relation to the protected characteristic groups of age, disability and sex. Socio-economic status and occupation are not a protected characteristic within the Equality Act, however, research also considered these characteristics, as they have also been discussed in relation to taxi access restrictions within the All Change at Bank scheme.

3.3 Research focused on London-related materials, though where information was not available at this scale, information at a regional or national scale was reviewed. This allowed us to gain a broader perspective on the topic and identify wider trends, providing a more nuanced understanding of the topic.

3.4 Overall, this review has enabled us to identify the potential transferability of the findings to the All Change at Bank scheme context.

Key findings

Disability

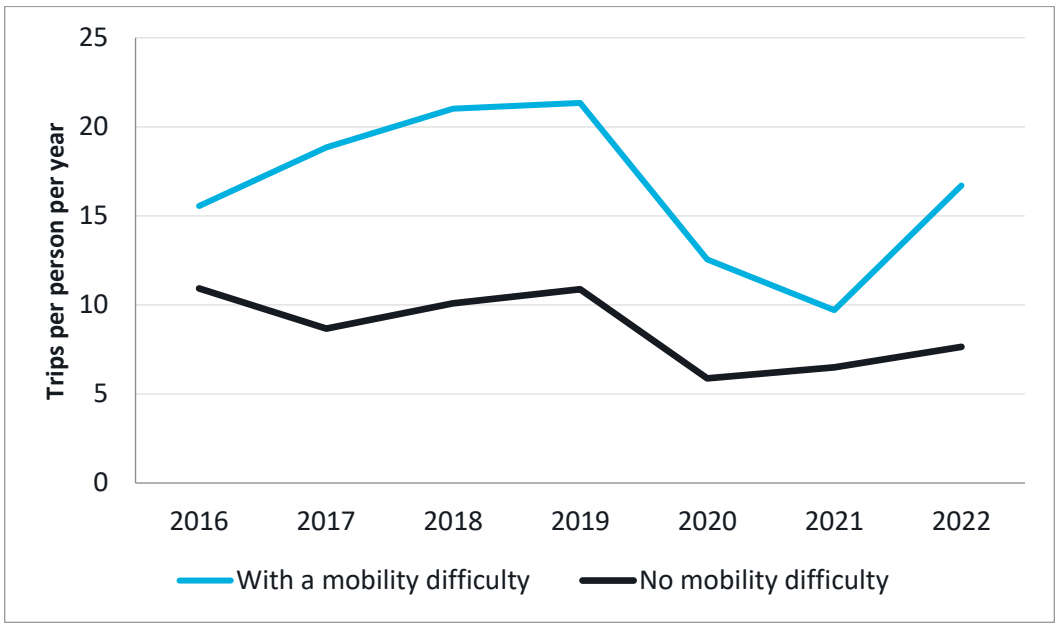
3.5 Transport for London's (TfL) EqIA evidence base for the Taxi (Black Cab) Fares and Tariffs Review 2022[1] outlined frequency of taxi use amongst disabled Londoners, Londoners who are wheelchair users, and non-disabled Londoners. Wheelchair users were found to be more likely to use a taxi at least once a week (6 per cent), than other disabled Londoners and non-disabled Londoners (both 3 per cent).

3.6 Distribution of taxi journeys by time band showed that two thirds of journeys (68.8 per cent) started during the daytime on weekdays. Within the 22:00-05:59 time frame, 7.2 per cent of journeys are taken Monday-Thursday, 2.1 per cent on Fridays, 1.5 per cent on Saturdays and 0.6 per cent on Sundays. As taxi journeys are more likely to be taken during the daytime, and because wheelchair users more regularly use taxis, daytime restrictions could subsequently impact a greater number of disabled users.

[1] **Appendix 4 EQIA evidence base.pdf (tfl.gov.uk)**

3.7 In addition, National Travel Survey data from 2022 shows that disabled people generally make more than double the number of taxi trips each year than non-disabled people[2].

Figure 3-1: Average number of taxi trips made per year, England, 2016 - 2023



Source: National Travel Survey 2022

3.8 This data indicates that disabled people are significantly more reliant on taxis as a method of transport. Subsequently, changes to the routes and availability of taxis may have a greater impact on disabled people, who are reliant on door-to-door taxi services.

Socioeconomic status and occupation

3.9 It should be noted that socio-economic status and occupation are characteristics which are not considered protected within the Equality Act and have not previously been considered within the EqIA. However, concerns about socio-economic status and occupation have been raised in relation to taxi access restrictions of the All Change at Bank scheme, in particular that those in the service and hospitality industry would be negatively impacted by a reduction in vehicles circulating. Literature review has not found evidence that service and hospitality workers rely on taxis for commuting journeys.

3.10 Data collected in 2023 by the Office of National Statistics analysed the method used to travel to work by occupation[3]. The data notes that zero observations were found within CoL that employed people working within 'Caring, leisure and other service occupations' used a taxi as their method of transport to work.

3.11 The most recent publication of Taxi and Private Hire Vehicle Statistics[4] (2023) utilised data from the 2021 National Travel Survey to determine personal travel patterns by residents of England. When analysing household income patterns, there were no clear trends in the

[2] **Average number of trips and miles by mobility status and mode, aged 16 and over: England, 2007 onwards, Office for National Statistics**

[3] **Method used to travel to work by occupation - Office for National Statistics**

[4] **Taxi and private hire vehicle statistics, England: 2023 - GOV.UK**

number of taxi or PHV trips taken and income levels, or with the distance travelled and income quintiles. This differs from the 2022 publication, which evidenced that people in lower income quintiles travel lesser distances via taxi than those in higher income quintiles: people in the bottom quintile travel 20 miles per person per year, compared to those in the highest income quintile travelling 32 miles.

3.12 However, Centre for London identified a relationship between income and type of transport used; people with lower incomes use buses more than those on higher incomes[5]. Centre for London determined that this is primarily because bus use is more accessible in terms of relative price to other modes, rather than being a deliberate choice. It is possible that bus journey times, reliability and passenger experience improves as a result of Bank traffic restrictions enabling a decrease in motor traffic and congestion. As such, this could produce a disproportionate positive impact for people on lower incomes, who are more likely to use buses.

Age and sex

3.13 As outlined in **Table 2.1**, concerns have been raised in relation to use of taxis by women and older people. Data from the 2021 National Travel Survey shows that in England, men took an average of 7 trips by taxi or PHV per year and women took an average of 6 trips by taxi or PHV per year[6].

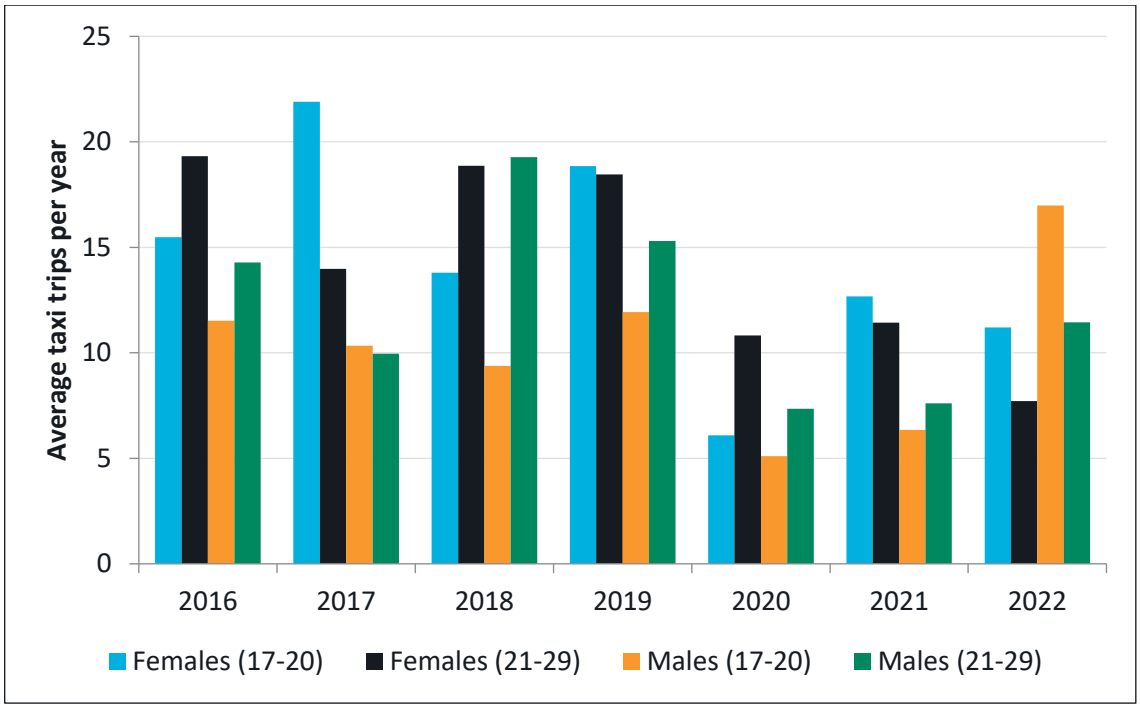
3.14 Despite the slight difference in number of taxi or PHV trips made by men and women, there was evidence of variation with age. National Travel Survey data from 2021 indicated that in England, women aged 17-30 took an average of 13 taxi/PHV trips per year, in comparison to men in the same age group, who took an average of 6 taxi/PHV trips per year. Women in England aged 21 – 29 also recorded a higher average of taxi/PHV trips per year than men in the same age group. The trend of a higher average of taxis/PHV trips per year by young women is a trend that has been reflected in the National Travel Survey data in recent years (see **Figure 3-2**).

3.15 However, in 2022, this historic trend reversed, with younger men in England taking more taxi/PHV trips on average per year than younger women, in comparison to previous years. Nevertheless, this data indicates that historically, younger women have taken more trips by taxi or PHV per year in comparison to young men. Taxi-related restrictions could subsequently impact younger women more than younger men. However, it should be considered that the overall average number of trips per year for both men and women are relatively small in comparison to the average number of overall trips a person may make per year. The subsequent effects of taxi-related restrictions could therefore be considered to be a minor impact.

[5] **Centre for London | What influences people's choice of mode of travel?**

[6] **Average number of trips, stages and distance travelled by sex, age and mode: England, 2002 onwards**

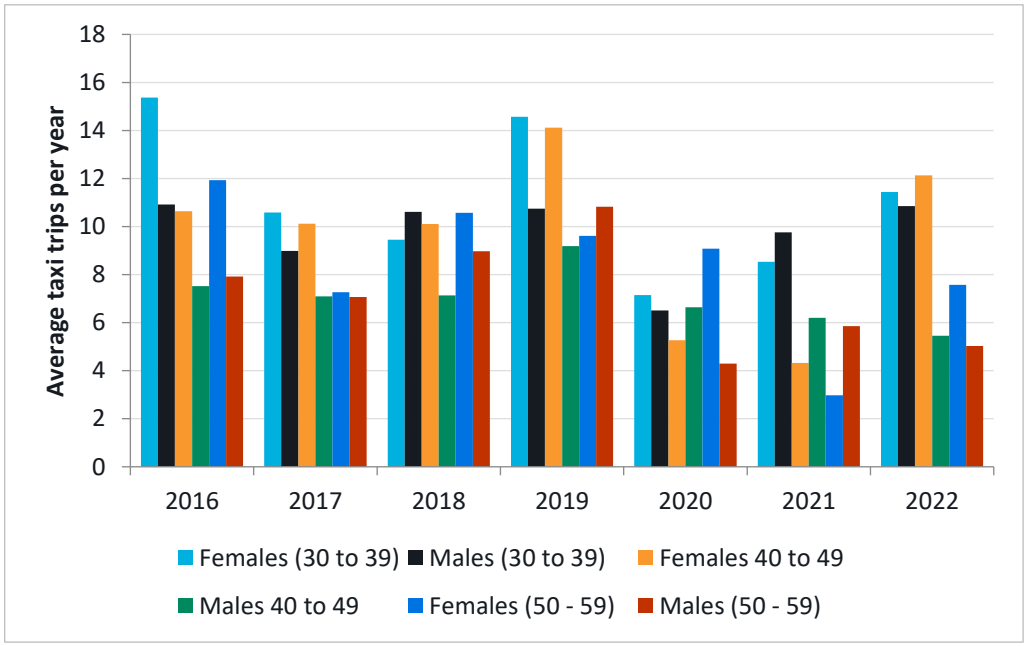
Figure 3-2: Average taxi trips made by younger people, by age group and by sex (2016 – 2022)



Source: National Travel Survey 2022

3.16 National Travel Survey data also shows a broad trend that between 2016 -2022, women in England aged 30 –39, 40 – 49 and 50 - 59 have generally made more trips per year on average by taxi in comparison to men in the same age categories (see **Figure 3-3**).

Figure 3-3: Average taxi trips made by younger people, by age group and by sex (2016 – 2022)

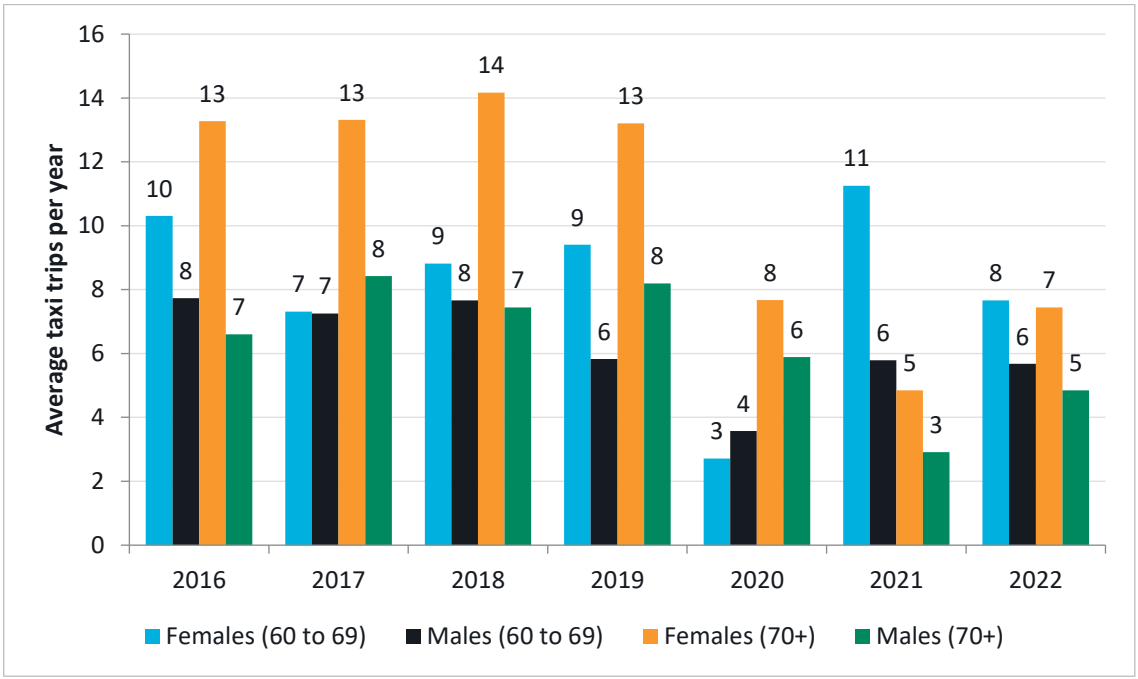


Source: National Travel Survey 2022

3.17 Similarly, for people aged 60 – 69, and 70+, women in England have historically made more trips by taxi per year than men in the same age categories. As shown in **Figure 3-4**, the average

number of taxi trips made per year by women aged 70+ has decreased since 2019. However, it should be considered that the overall average number of trips per year for both men and women are relatively small in comparison to the average number of overall trips a person may make per year. The subsequent effects of taxi-related restrictions could therefore be considered to be a minor impact.

Figure 3-4: Average taxi trips made by younger people, by older people, by age group and by sex (2016 – 2022)



4 Review of Bank Junction Availability Analysis Report

Introduction

4.1 WSP was commissioned by CoL of London (CoL) to undertake analysis regarding:

- Taxi availability in the Bank junction area, including taxi counts and taxi rank usage
- Wait and dwell times for taxis/PHVs.
- Variation in taxi journey times for passengers, when comparing routes via Bank Junction; Bishopsgate, and the fastest route on a travel planning app.

4.2 This chapter analyses the data and highlights the key findings that are relevant for equality impacts.

Taxi availability

4.3 30 ranks across CoL were surveyed to determine taxi availability. Seven ranks were within the Bank junction area, including Wood Street, Gresham Street, Cheapside, Princess Street, Cornhill, and Queen Victoria Street. The rest of CoL was divided into three sections (north, east, and west). Liverpool Street was assessed separately due to more concentrated taxi activity around the station.

4.4 A total of 2,002 taxis were recorded across the survey period. This included 135 taxi visits to the Bank junction area. The report indicated that the Bank junction area had fewer taxis. None of the Bank rank locations recorded more than 101 taxis: four recorded between 2-20 taxis, two recorded between 21-100 taxis and one recorded a single taxi visit. In comparison, all other sections recorded at least one site with 101+ taxis, suggesting that taxi rank usage is not concentrated at one rank within the Bank junction area.

4.5 The report also compared changes in taxi counts over time at comparative locations. These locations comprised Oxford Street and Regent Street (City of Westminster), alongside the “rest of the City”. This comparison illustrated that all locations had at least a 25 per cent decrease in taxi volumes from 2017 to 2022/23. Regent Street experienced the highest percentage change, with a 46 per cent reduction in taxi counts from 2017 to 2022/23. In contrast, the Bank area had a 41 per cent reduction in taxis. Furthermore, there has been a 30 per cent decrease in licensed taxis in London between 2016 and 2023; the average number of Licensed Taxis detected (April – June) was 11,396 in 2016 compared to 6,344 in 2023[7].

Implications for EqIA

4.6 Findings indicate that there has been a decrease in taxi availability in the Bank junction area, in comparison to previous years. However, the scale of the reduction is not unique to the Bank

[7] **CCLEZ Online Fact Sheet (tfl.gov.uk)**

junction area, as the wider City and comparative locations have experienced a similar scale of change.

4.7 The preceding literature review identified that it is more likely that disabled people – which may include older people with age-related mobility impairments - and young women are likely to make more trips via taxi or PHV. Subsequently, a decline in the number of taxis available could disproportionately impact these people who rely on taxis for essential mobility. This is because fewer taxis available could make accessing taxis more difficult for these passengers, due to fewer numbers of these vehicles being available.

4.8 However, the results of the taxi counts indicate that the number of taxis available in the Bank junction area is proportionate and comparable to the wider trends in taxi availability across CoL, and across London.

Wait Times

4.9 WSP reported that average wait times for PHVs in the Bank area (including Free Now, Uber and Bolt) was 3 minutes and 33 seconds. This was 13 seconds above the average wait time recorded across the whole of CoL (3 minutes and 20 seconds). This indicates that there is not significant variation in wait times for PHV passengers.

4.10 The survey results similarly recorded that there was also little variation in taxi wait times (Free Now, Addison Lee and Bolt) in the Bank area in comparison to rest of CoL. However, across all locations surveyed, wait times for a taxi were longer in comparison to the wait time for a PHV. The average wait time for a taxi at Bank was 4 minutes and 11 seconds, in comparison to an average of 4 minutes and 1 second for CoL. The north study location recorded the highest wait time for a taxi, at 4 minutes at 28 seconds.

4.11 Though there was little variation in taxi and PHV wait times across CoL, Poultry and Cornhill were within the top three locations with the highest average taxi wait times across all sites surveyed. These sites are within the Bank junction area. As these locations are situated within the Bank area, longer than average wait times may exacerbate passenger perception of longer wait times within the whole Bank junction area.

Implications for EqIA

4.12 Longer wait times for taxis might be associated with greater physical discomfort for disabled people, older people with mobility impairments due to ageing, or pregnant women with acute mobility impairments. Longer wait times may also be associated with perception of safety during late night or early morning hours, which may impact some people more than others; particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment.

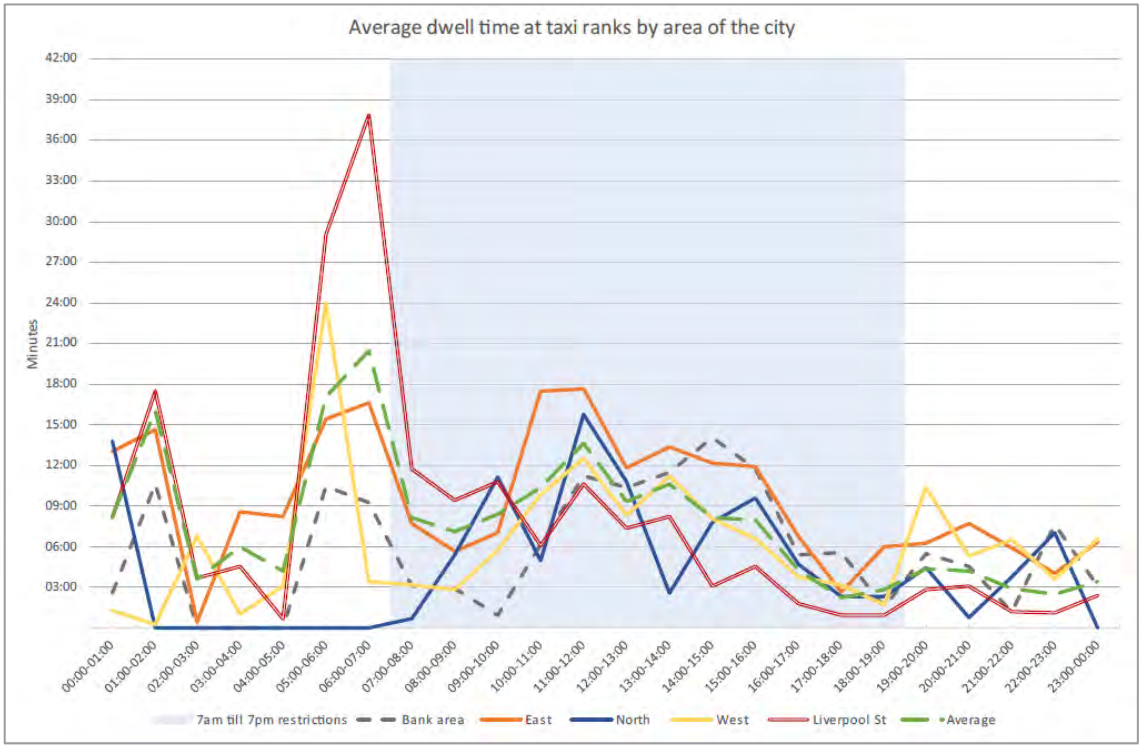
4.13 The analysis shows that the average wait time for taxis and PHVs in the Bank junction area is not significantly higher when compared to the rest of CoL (approximately +13 seconds for PHV users, and +10 seconds for taxi users). Overall, this difference in average wait time is not considered to disproportionately impact people with protected characteristics as identified above.

Dwell times

4.14 Dwell times for taxis is the time between taxis dropping off passengers and picking up passengers/moving on. The taxi ranks in the Bank area recorded an average dwell time of 7

minutes and 53 seconds. When compared with the other areas of CoL, the Bank area had, on average, less dwelling time (average of 1 minute and 7 seconds less) than these other areas.

Figure 4-1: Average dwell times at taxi ranks in CoL (2023)



Source: Bank Junction Taxi Availability Analysis, WSP, 2023

4.15 Across both the Bank area and CoL, dwell times were highest between:

- 01:00 to 2:00
- 05:00 to 07:00, and
- 11:00 to 12:00

4.16 Across both the Bank area and CoL, dwell times were lowest between:

- 02:00 and 05:00 and
- 19:00 and 22:00.

4.17 To note, the top three taxi ranks with shortest average dwell times across all locations surveyed were located in the Bank junction area. These ranks were located at Princes St, Gresham St, and Cornhill. Dwell times at these locations were under one minute, which is a notable decrease in comparison to the dwell time average across Bank, and across the wider CoL.

Implications for EqIA

4.18 Decreased dwell time might indicate that taxis are moving on at greater pace from taxi ranks. Waiting for a taxi late at night can be a safety concern, particularly for women. Decreased dwell time during late night and early morning hours (02:00 – 05:00) could make it more difficult for prospective passengers to hail a ride on-site. This may affect the perception of

safety, which may impact some people more than others; particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment.

4.19 The rates and times at which dwell time decreases in the Bank area aligns with the patterns shown across the wider City, suggesting that, on average, Bank junction is not disproportionately impacted by lower dwell times. In addition, overall, Bank taxi ranks did not record a significantly lower average dwell time, in comparison to the rest of CoL. This suggests that there is not a disproportionate difference in dwell time between Bank and other areas within CoL.

4.20 However, additional surveying to monitor taxi and kerbside activity could be undertaken to understand why three ranks in the Bank junction area experienced the shortest average dwell times of all locations surveyed. This could provide greater understanding of whether there is a corresponding impact on the length of time people at these ranks need to wait before being able to hail an available taxi.

Journey time and cost comparison

4.21 In order to assess the impact of the closure on journey times and related costs, four location pairs and the time it took to drive between them were assessed between 16:00 and 19:00, when motor vehicle restrictions are in place at Bank junction. The origin destination pairs were:

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

4.22 All origin destination pairs were allocated at least two routes for journey time surveying, with two pairs given a third route via Bishopsgate for additional data collection. Route options were:

1. Take the vehicle through Bank Junction (with temporary dispensation)
2. Take the vehicle along Bishopsgate
3. Take the vehicle along the fastest route that observes all relevant traffic restrictions in place between 7am and 7pm using the Waze app.

Journey Times

4.23 The results showed that the Bank restrictions do not appear to have a significant impact on journey time. Out of eight journey time routes analysed, routes via Bank produced the quickest journey on two occasions. These were:

- Southwark Street to Silk Street (northbound), 6 minutes faster than the slowest route, and a minute and half faster than the second-fastest route.
- Whitechapel High Street to Blackfriars Station (eastbound), 6 minutes and 36 seconds quicker than the slowest route, and 2 minutes and 36 seconds quicker compared to the second-fastest route.

4.24 Travel via Bank was the second fastest route option for three other routes analysed. These were:

- Fenchurch Street Station to Giltspur Street (eastbound), one minute slower than route via Waze

- Fenchurch Street Station to Giltspur Street (westbound), four minutes slower than route via Waze
- Whitechapel High Street to Blackfriars Station (eastbound), approximately 10 seconds slower than the route via Waze.

4.25 Travel via Bank was the slowest route option for the remaining routes analysed. These were:

- Southwark Street to Silk Street (southbound), 2 minutes and 53 seconds slower than the fastest route via Waze
- Liverpool Street to Queen Street (westbound), 2 minutes and 45 seconds slower than the fastest route via Bishopsgate
- Liverpool Street to Queen Street (eastbound), slower than the fastest route by approximately 5.5 minutes.

Implications for EqIA

4.26 For some disabled people, older people with age-related mobility impairments, or pregnant women, increases to journey time could cause greater discomfort during travel. In instances that routes via Bank were the quickest, the second-fastest routes were comparable to journey times via Bank as they were not significantly slower. This indicates that these routes present alternative options that are not likely to present severe corresponding impacts for passengers as a result of increased journey time.

4.27 This analysis further shows that most frequently, the quickest routes were via Waze, which instructed vehicles to find the quickest routes that observe the Bank junction restrictions. For these origins and destinations, this data indicates a minor positive impact for people in the protected characteristic groups outlined above, as minor improvements to journey times could make journeys more comfortable for these passengers.

4.28 It is recommended that there is ongoing analysis and monitoring in relation to how wider transport schemes and plans interact with motor vehicle restrictions at Bank. This is because changes along alternative routes which observe the Bank junction restrictions could result in longer journey times for taxis, and subsequently a more disproportionate negative impact, in comparison to the relatively small journey time differences currently observed.

Journey Costs

4.29 WSP reported the corresponding journey costs associated with the routes taken for these journeys for the origin destination pairs listed above. The report presented evidence of increased costs on certain routes avoiding Bank junction.

4.30 Routes via Bank were cheapest for the following routes, when compared to the most expensive route option:

- Fenchurch Street Station to Giltspur Street (eastbound): £2.23 cheaper via Bank
- Whitechapel High Street to Blackfriars Station (eastbound): £0.48 cheaper via Bank
- Southwark Street to Silk Street (northbound): £1.73 cheaper via Bank

4.31 However, routes via Bank were also the most expensive for the following routes, when compared to the cheapest route option for:

- Southwark Street to Silk Street (southbound): £4.03 more expensive via Bank

- Fenchurch Street Station and Giltspur Street (westbound) £2.34 more expensive via Bank
- Liverpool Street to Queen Street (eastbound): £1.65 more expensive via Bank
- Liverpool Street to Queen Street (westbound): £3.21 more expensive via Bank

4.32 When all journeys were compared, and using the approximate journey costs presented in the WSP report, routes via Bank were £0.68 more expensive on average than those not via Bank.

Implications for EqIA

4.33 As identified in the literature review, disabled people are more likely to make journeys via taxi. In addition, Increased costs are particularly significant to disabled people who face extra financial barriers and a higher cost of living; the average disabled household faces £975 a month in extra costs[8]. Older people may also be affected by cost changes, as older people are more likely to be reliant on fixed incomes (such as pensions).

4.34 Cost savings were identified for some routes that avoid Bank. These savings are relatively low for a single journey, though the potential cumulative cost impact for people who regularly make this journey could be considered a positive impact for disabled people and older people on fixed incomes (such as pensions) that are more likely to make taxi journeys.

4.35 However, cost increases were also identified for some routes that avoid Bank. These savings are relatively low when considering a single journey, however the potential cumulative cost impact for people who regularly make this journey could be considered as a negative impact for disabled people and older people on fixed incomes (such as pensions) that are more likely to make taxi journeys.

4.36 Subsequently, we have further analysed the cost impact of routes that are more expensive when avoiding Bank, in relation to the Taxicard scheme. The Taxicard scheme provides subsidised taxi journeys for people with serious mobility impairments who experience difficulty using public transport. The scheme is funded by Transport for London and all the London boroughs and is administered by London Councils. It allows those with a Taxicard to make journeys in licensed London taxis and private hire vehicles at a reduced rate[9]. Using the findings of the WSP report, the cost implications for Taxicard users have been identified and summarised below.

Taxicard Review

4.37 Taxicard journeys have a maximum fare guarantee based on price per mile. For any journeys made where the metered fare is lower than this maximum fare, the individual's contribution is based on the metered fare with a fixed subsidy for journeys over 3 miles. These charges change dependent on the borough the Taxicard user lives in. For most boroughs (including CoL), the single subsidy is £10.00, and the minimum member fare is £3.80[10]

4.38 Using the journey time data from the WSP Report, the changing cost of taxis for Taxicard users (whose costs are calculated by mile) has been calculated in Table 4.1.

[8] https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag-2023/

[9] **Taxicard - Transport for London (tfl.gov.uk)**

[10] **Payment | London Councils**

4.39 Using the Northbound case study, travelling from Southwark Street to Silk Street via Bank is 1.57 miles which would cost £3.80 with a Taxicard (£12.15 without one). With the same origin and destination, but avoiding the Bank restrictions, this 2.4 mile journey would cost £4.30 with a Taxicard (£13.88 without one).

Table 4.1: Taxicard Cost Analysis

Route	Via	Distance (miles)	Price (standard)	Price with Taxicard
Southwark to Silk Street - Northbound	Bank	1.57	£12.15	£3.80
Southwark to Silk Street - Northbound	Alternative route	2.4	£13.88	£4.30
Whitechapel High Street to Blackfriars Station - Eastbound	Bank	2.5	£13.42	£4.30
Whitechapel High Street to Blackfriars Station - Eastbound	Alternative route	1.8	£13.90	£3.80
Fenchurch Street Station to Giltspur Street - Westbound	Bank	1.5	£11.00	£3.80
Fenchurch Street Station to Giltspur Street - Westbound	Alternative route	1.7	£8.67	£3.80
Liverpool Street to Queen Street- Eastbound	Bank	1.6	£11.85	£3.80
Liverpool Street to Queen Street - Eastbound	Alternative route	1.0	£11.00	£3.80

4.40 This suggests that Taxicard users may experience both minor positive or negative cost impacts, depending on the passenger origin and destination.

4.41 For the Southwark to Silk Street route, there is a 13 per cent cost increase for Taxicard users, when using a route that avoids Bank, Meanwhile, travelling eastbound from Whitechapel High Street to Blackfriars Station via Bank presents a 13 per cent cost increase for Taxicard users in comparison to alternative routes. For both routes, this raw cost is a difference of £0.50, which may be considered to be a relatively small cost difference for a single journey. Subsequently, cost analysis indicates that Bank restrictions do not have a significant disproportionate negative or positive impact for disabled people who use Taxicard.

4.42 It is recommended that The City of London Corporation monitor fares of alternative taxi routes regularly and ensure that future plans and strategies which could further impact taxi fare costs are discussed in collaboration with taxi-users experiencing multiple and complex disadvantage.

5 Crime Data Analysis

Introduction

5.1 In response to concerns raised in relation to public safety as a result of the motor restrictions in place at Bank junction, data for the Bank junction area has been analysed. Data from 2016 to 2023, covering the period between September 1st and November 29th has been downloaded from data.police.uk, which provides open data about crime and policing in England, Wales, and Northern Ireland. This police data records 14 different categories of criminal activity at street-level. Given the concerns expressed by some stakeholders about the potential implications of the motor traffic restrictions on public safety, analysis was undertaken for following categories of crime:

- Anti-social behaviour
- Public order
- Theft from the person
- Violence and sexual offences
- Robbery

5.2 It should be noted that whilst this data can be used to analyse and illustrate trends in criminal activity, it is not possible to attribute a direct effect caused by the All Change at Bank scheme, or the Bank on Safety scheme.

5.3 In addition, the Office of National Statistics recommends that police recorded crimes should be interpreted with caution as trends may reflect improvements made by police forces in identifying and recording offences, as well as an increase in victims reporting incidents[11].

Methodology

5.4 The three months of September, October and November were selected for analysis to provide a 'snapshot' of activity to facilitate comparison between years. At the time of analysis, data from November 2023 was the most recent crime data available. Analysing the three most recent months available allowed for the analysis to align with the full extent of the All Change at Bank restrictions. A timeline of changes to highway layout, public realm, and motor restriction at Bank junction is presented in **Table 5.1** overleaf. A map indicating the location of the Bank junction area is presented in **Figure 5-1**.

5.5 Throughout analysis, this September – November period will be referenced as the year from which the data has been collected. 2016 was selected as the starting point for analysis, as this was the final year of the original layout of Bank junction, pre-dating the Bank on Safety[12]

[11] **Crime in England and Wales: year ending June 2023**

[12] The Bank on Safety scheme at Bank Junction in CoL focuses on restricting the number of vehicles that cross Bank Junction during the working day, primarily in order to significantly reduce the number of collisions occurring at this

scheme (the predecessor to the All Change at Bank scheme). 2020 has been excluded from this analysis due to the implications for policing and criminal activity associated with the impacts of the COVID-19 pandemic[13].

Table 5.1: Timeline of highway layout changes and motor traffic restrictions at Bank junction

Year	Highway layout and motor traffic restrictions at Bank junction
2016	Original layout, no interventions.
2017	'Bank on Safety' experimental scheme introduced in May 2017
2018	Bank on Safety scheme made permanent September 2018.
2020	Temporary improvements installed between January and September 2020, including wider pavements, wider and shorter pedestrian crossings, to relieve pedestrian crowding.
2021	Public consultation on 'All Change at Bank' scheme
2023	Traffic orders gradually introduced from February 2023 – November 2023 including the following restrictions to motor vehicle access: • Queen Victoria Street, at its junction with Mansion House Street, closed to all motor vehicles (February) • Threadneedle Street, between Bank Junction and Bartholomew Lane, closed to all motor vehicles (July). • No motor vehicles to enter from the north end of Princes Street heading southbound, except buses and for access (to Princes Street and Cornhill) (November)

Figure 5-1: Bank Junction Area

Basemap source: Bing Maps, 2024

location. Under the scheme only buses and pedal cyclists are allowed to cross Bank Junction or access Cornhill in a westbound direction from Monday – Friday 7am-7pm.

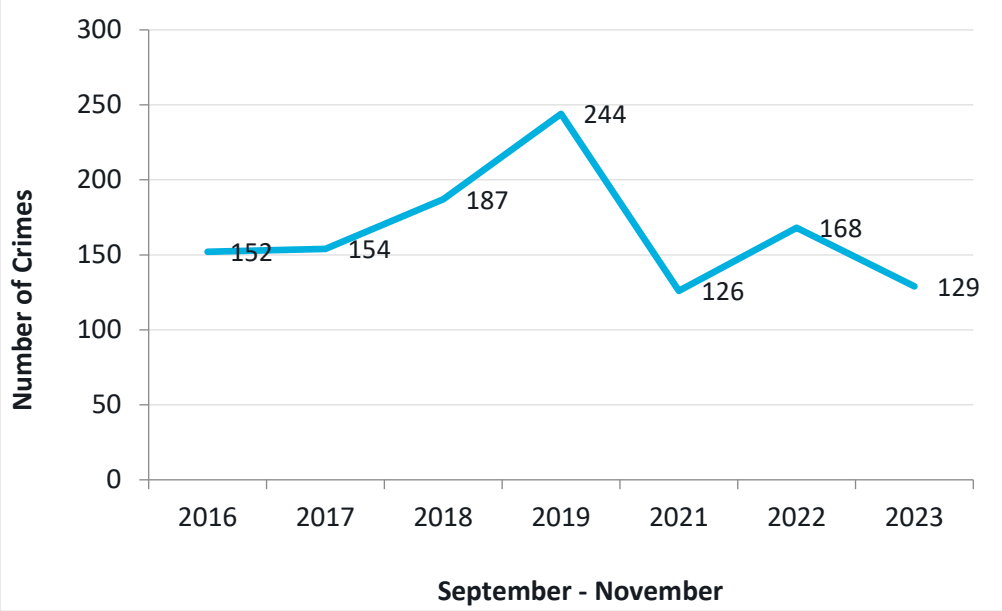
[13] Across the United Kingdom, most crime types experienced sharp, short-term declines during the COVID=19 lockdown restrictions, followed by a gradual resurgence as restrictions were relaxed (see **Kirchmaier and Villa-Llera, 2020**).

Analysis

Crime Rates

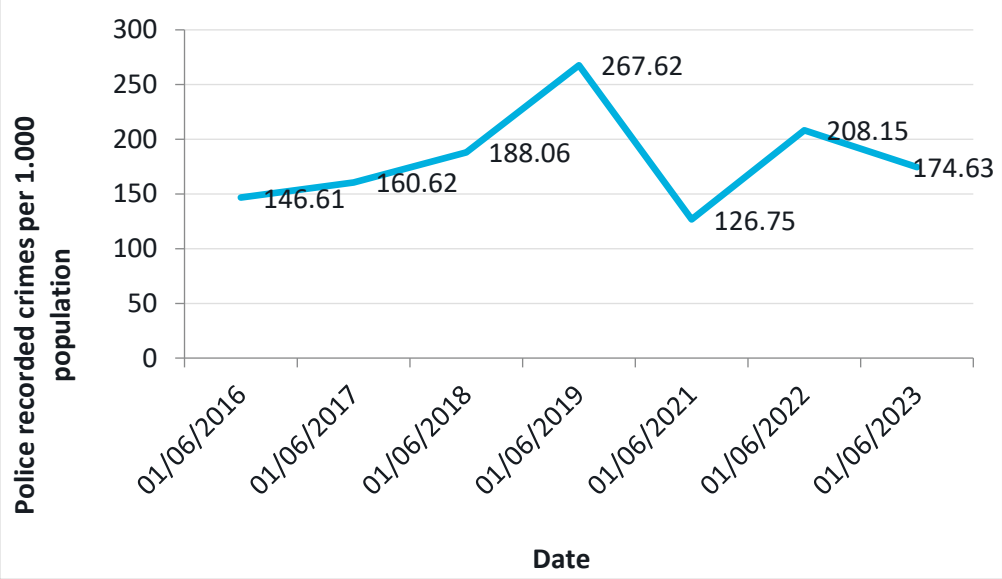
5.6 Between 2016 and 2023, the overall trend illustrates a decrease in the total number of crimes in the Bank Junction area, however, there are periodic changes within this overall trend.

Figure 5-2: Number of Crimes – Bank Junction (Sept-Nov) 2016 – 2023



Source: data.police.uk

Figure 5-3: Crime Rates – City of London, (Sept-Nov) 2016 – 2023



Source: www.police.uk

5.7 Between 2016 and 2019, the total number of crimes recorded in the Bank junction area rose by approximately 60 per cent. Between 2019 and 2021, the total number of crimes decreased by approximately 48 per cent. The total number of crimes rose again in 2022 and decreased again in 2023 (**Figure 5-2**). These patterns and overall trend of crime rates[14] align with the crime rates across CoL (**Figure 5-3**).

5.8 This broad trend also aligns with research findings[15] which indicate continuation of a long-term downward trend in crime since the beginning of the COVID-19 pandemic. The Crime Survey for England and Wales (CSEW) for the year ending June 2023 showed that total crime decreased by 10 per cent compared with the year ending June 2022, and 18 per cent lower than the year ending March 2020. This suggests that the rate at which crime is happening within the Bank junction area is aligned with wider patterns across CoL, and nationally, and does not present a positive or negative correlation with the introduction of restrictions at Bank junction.

Implications for EqIA

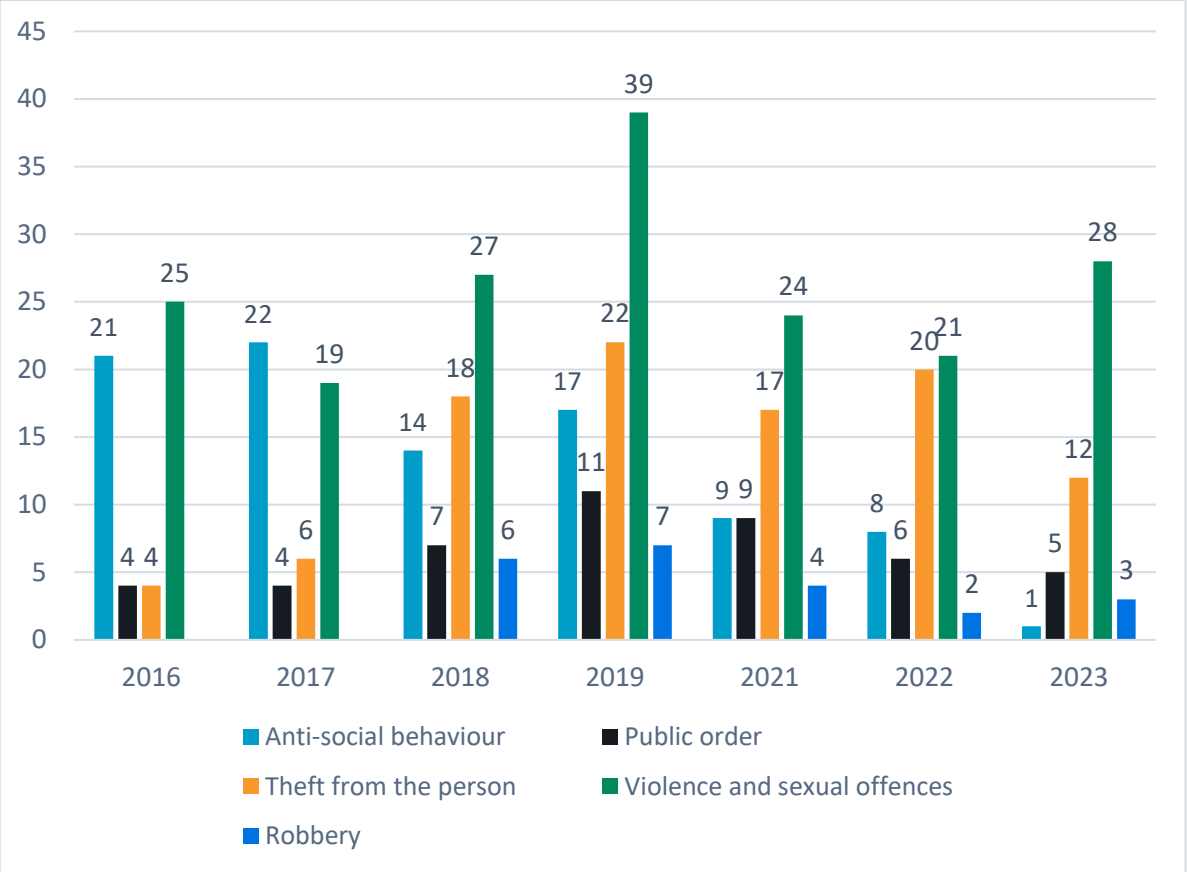
5.9 Overall, the fluctuations in number of crimes recorded in the Bank junction area have been proportional to crime rate trends across CoL. This indicates that overall crime level changes within the Bank junction area have not been disproportionate to the immediate surrounding area.

[14] **https://www.police.uk/pu/your-area/city-of-london-police/performance/compare-your-area/?tc=cp**

[15] Crime Survey for England and Wales (CSEW), 2023

Types of Crime

Figure 5-4: Relevant crimes, Bank junction area, 2016 – 2023



Source: data.police.uk

5.10 **Figure 5-4** shows that within the Bank junction scheme area, most violent crime types generally reached a peak in 2019, and have subsequently decreased, which aligns with the broader crime rate trends over this time (see **Figure 5-2**).

5.11 Exceptions to the trend include crimes recorded as anti-social behaviour. These crimes have decreased since 2017; one crime was recorded as anti-social behaviour between September – November 2023. Public order offences were also relatively low and indicated a relatively small decrease between 2022 and 2023.

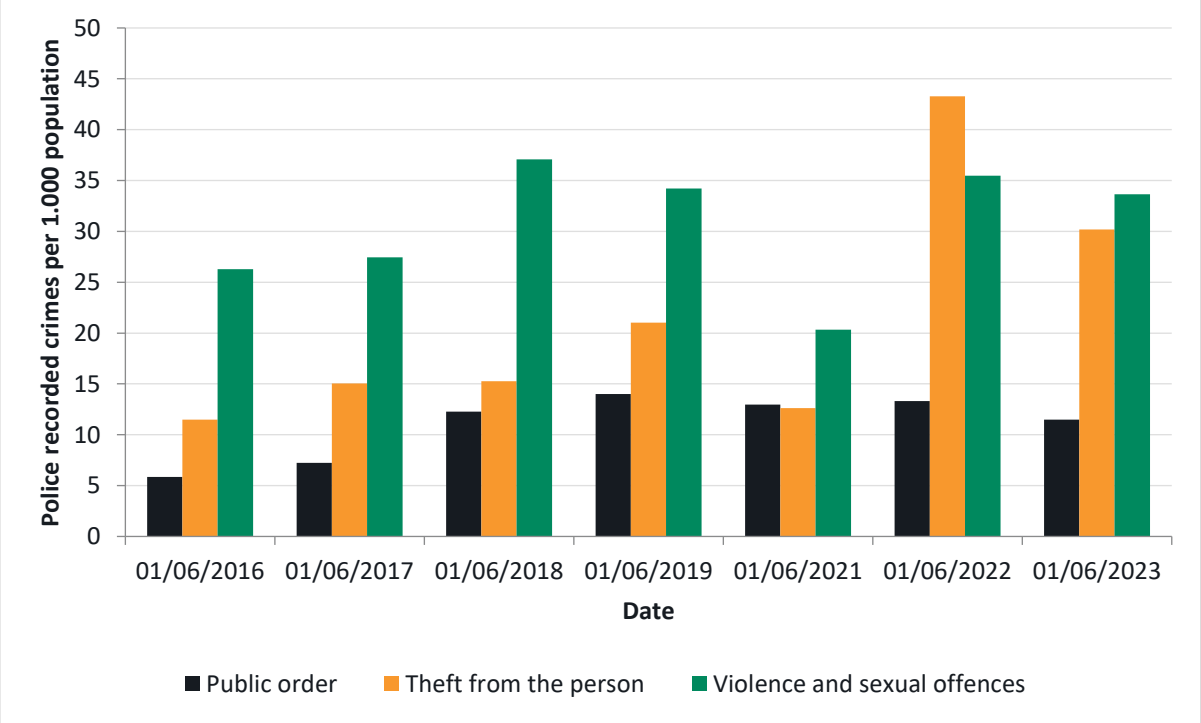
5.12 In addition, violence and sexual offences peaked in 2019, decreased until 2022, and increased again in the September – November 2023 period. This presents a moderate percentage increase of 33.3 per cent in comparison to September – November 2022. This finding contrasts with the broader crime rate trend for violence and sexual offences across CoL (**Although there** has been a small increase of violent and sexual offences in the Bank area between 2022 and 2023, it should be noted that this represents a small increase in terms of raw numbers (+7 additional violent and sexual offences). As such, this is too small of a change to be attributed directly with the All Change at Bank scheme. In addition, it is recommended that ongoing monitoring of this type of violent crime is undertaken to determine whether any future trends are disproportionate in comparison to historic trends, and trends displayed around CoL.

5.13 Figure 5-5), which increased in 2022, and decreased slightly in 2023.

5.14 In addition, between 2016 and 2023, rates of violence and sexual offences have been consistently recorded in relatively high proportions in comparison to other crime types. During this time, in both the Bank junction and wider City, violence and sexual offences comprised the highest or second highest rate or violent crimes. Subsequently, this does not indicate that there is a correlation between the introduction of restrictions at Bank junction with an increase in violence and sexual offences. This is because more violent and sexual offences have been recorded than other violent crime types between 2016 – 2023 (with the exception of 2017). Subsequently, the data from 2023 in relation to violent crimes suggests a continued trend of a higher proportion of violent and sexual offences in the Bank junction area, in comparison to other violent crimes.

5.15 Although there has been a small increase of violent and sexual offences in the Bank area between 2022 and 2023, it should be noted that this represents a small increase in terms of raw numbers (+7 additional violent and sexual offences). As such, this is too small of a change to be attributed directly with the All Change at Bank scheme. In addition, it is recommended that ongoing monitoring of this type of violent crime is undertaken to determine whether any future trends are disproportionate in comparison to historic trends, and trends displayed around CoL.

Figure 5-5: Crime rates of relevant crimes, City of London (Sept-Nov) 2016 - 2023



NB: Anti-social behaviour rates were not included in the crime-rate dataset

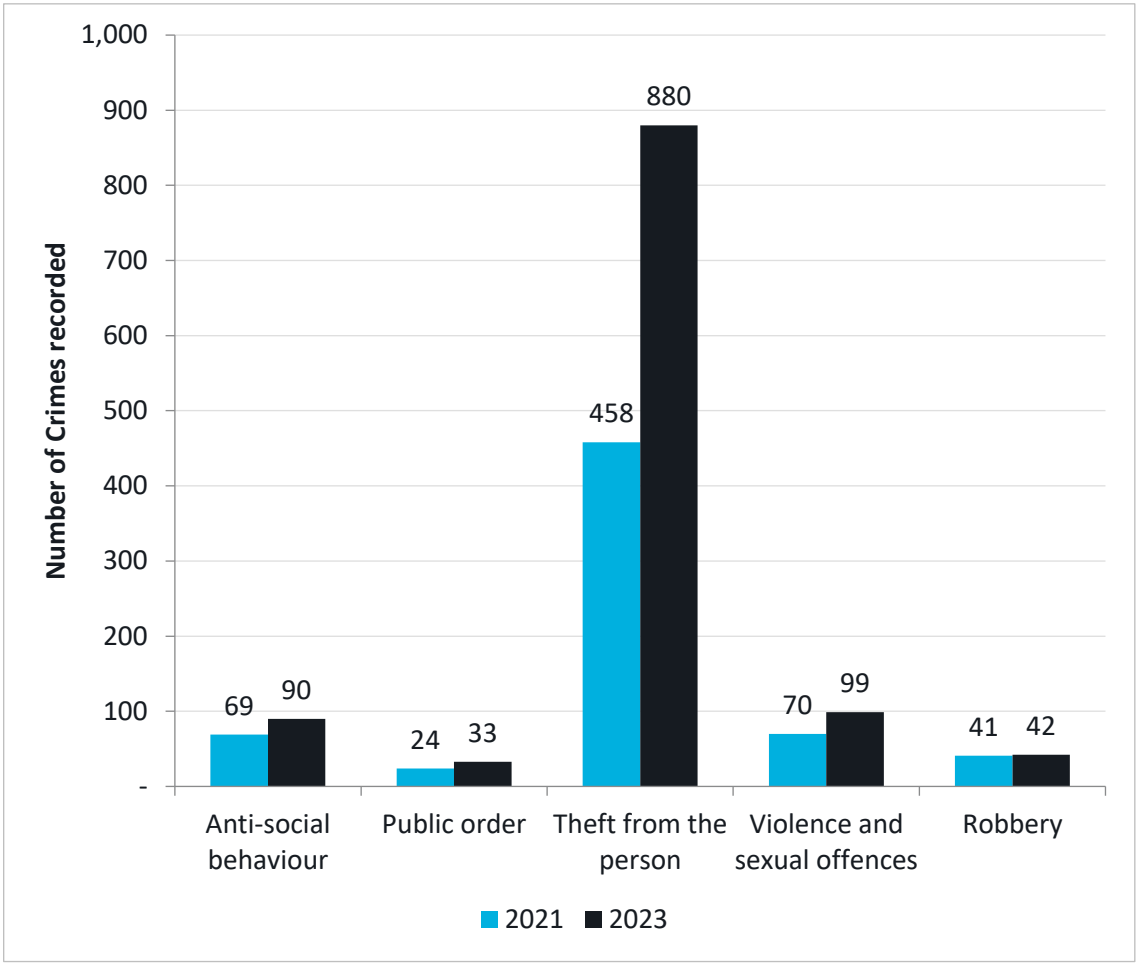
Source: www.police.uk

Comparison with a proxy area

5.16 Oxford Street has been chosen as a proxy area to compare trends in crime with the Bank junction scheme area. Both areas feature relatively high levels of street-level activity as they are prominent locations in central London. In general, Oxford Street recorded a higher quantum of criminal activities. In addition, crime analysis of Oxford Street indicates that between 2021 and 2023, there was a rise in violence and sexual offences (+41.43 per cent),

suggesting that the trend outlined in the Bank junction area (see **Figure 5-4**) is not disproportionate in comparison to wider London. In addition, this analysis indicates that Bank junction has experienced a smaller increase than that experienced at Oxford Street.

Figure 5-6: Oxford Street, changes in violent crime, 2021 - 2023



Source: data.police.uk

Implications for EqIA

5.17 Between 2022 and 2023, the number of violent and sexual offences rose within the Bank scheme area (7 additional crimes). Between 2022 and 2023, the crime rate for this offence fell within the wider City of London. Personal safety, (or perception of personal safety) may impact some people more than others[16], particularly women[17], LGBTQ+ individuals[18], and ethnic minorities who may experience higher rates of harassment.

[16] **Office of National Statistics, 2022, Public Safety**

[17] https://www.london.gov.uk/media/99003/download?attachment%20

[18] https://www.sustrans.org.uk/media/10527/sustrans-2021-walking-and-cycling-index-aggregated-report.pdf

Spatial Analysis

5.18 Coordinates linked to relevant crimes in the Bank junction area have been mapped to present changes in crime location over time. It should be noted that the preciseness of this spatial analysis is limited, as coordinates represent the approximate location of a crime, and not the exact place that it occurred. In addition, estimates of geocoding accuracy in different police forces range from 60 per cent to 97 per cent[19].

5.19 Nevertheless, the data presents an indication of crime location, which has been mapped from 2016 – 2023. This is presented in **Figure 5-7 to Figure 5-13.**

5.20 Results of this analysis indicate that over time, crime hotspots have become increasingly associated with the periphery of the Bank area. In addition, the types of violent crime that have been recorded across the Bank area are not consistently linked to any particular location. As such, this coordinate data indicates that there is no spatial correlation between location of violent crime, and the type of violent crime that was recorded.

Implications for EqIA

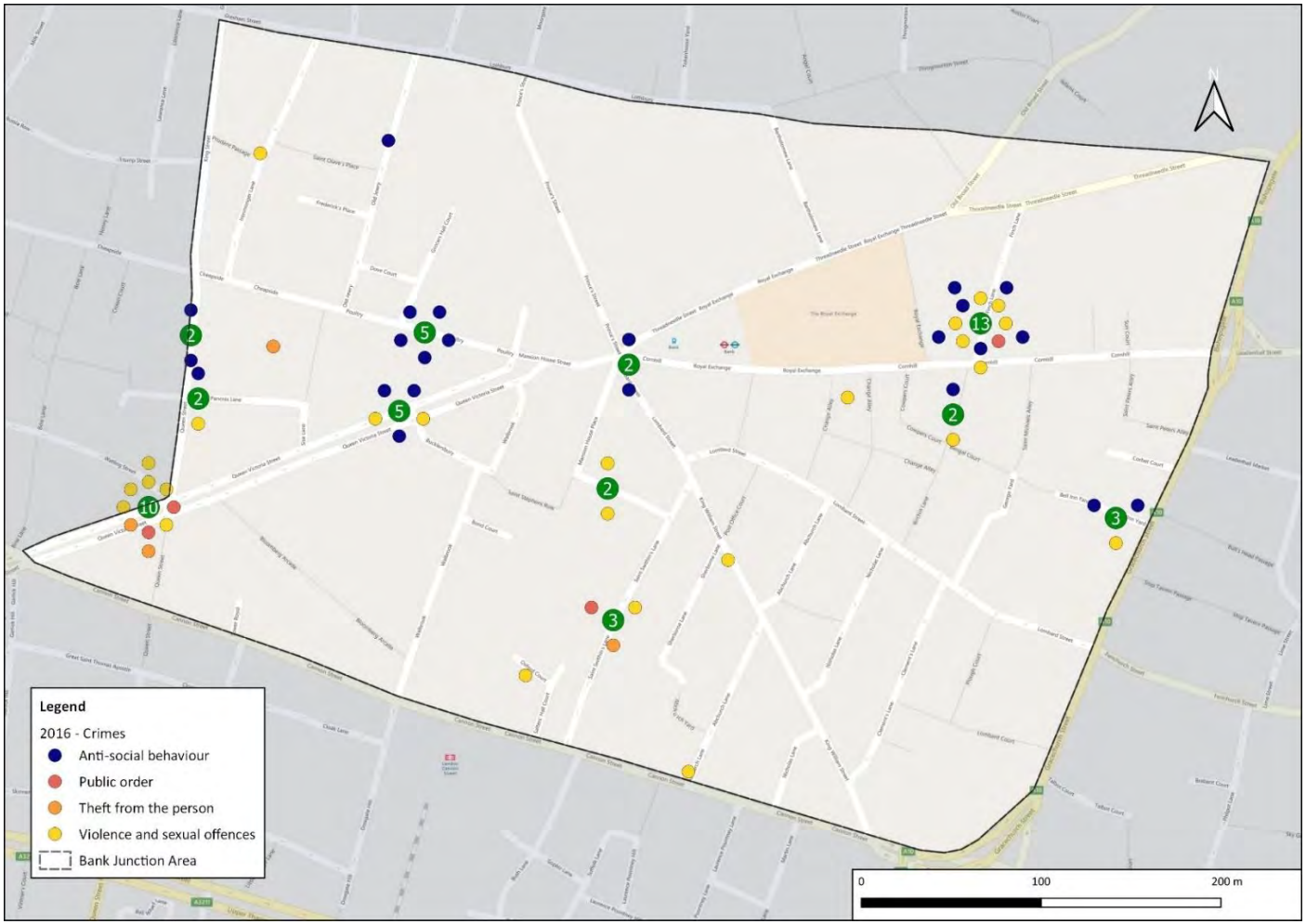
5.21 Personal safety, (or perception of personal safety) may impact some people more than others, particularly women, LGBTQ+ individuals, and ethnic minorities who may experience higher rates of harassment. Spatial analysis indicates that crime has shifted towards the periphery of the Bank junction area. Decreased crime recorded at the centre of the Bank junction area could present positive impacts for people with the protected characteristics identified. Whilst this indicates a potential spatial correlation with the introduction of the All Change at Bank motor restrictions and wider public realm improvements, greater location data accuracy for crimes recorded would be required to support this potential correlation.

5.22 In addition, this spatial analysis could suggest that there are more concentrated 'hotspots' of crime occurring at locations, which could decrease the perception of public safety for people with the protected characteristics identified above. Some locations have recently recorded higher concentrations of crime, such as Finch Lane and Lombard Street. It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police to establish whether this spatial trend continues. In addition, public realm within these emerging hotspots could be reviewed to identify appropriate interventions that could support greater security and an increased sense of public safety.

5.23 It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police to be able to respond appropriately to sudden or disproportionate changes to crime trends in the Bank junction area, in comparison to historic trends, or when compared to the wider CoL.

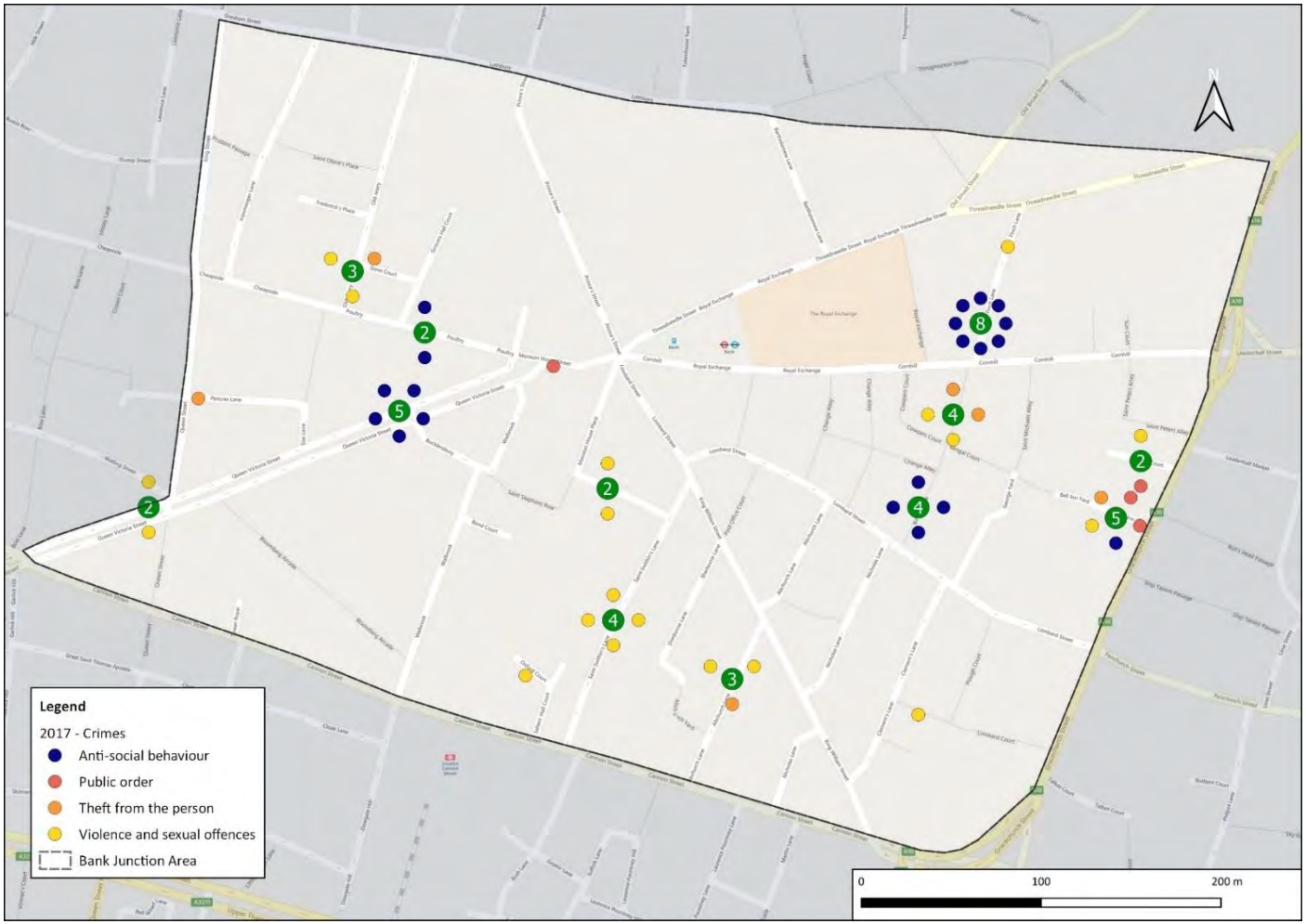
[19] https://data.police.uk/about/#location-anonymisation

Figure 5-7: Spatial distribution of relevant crimes, Bank junction, 2016



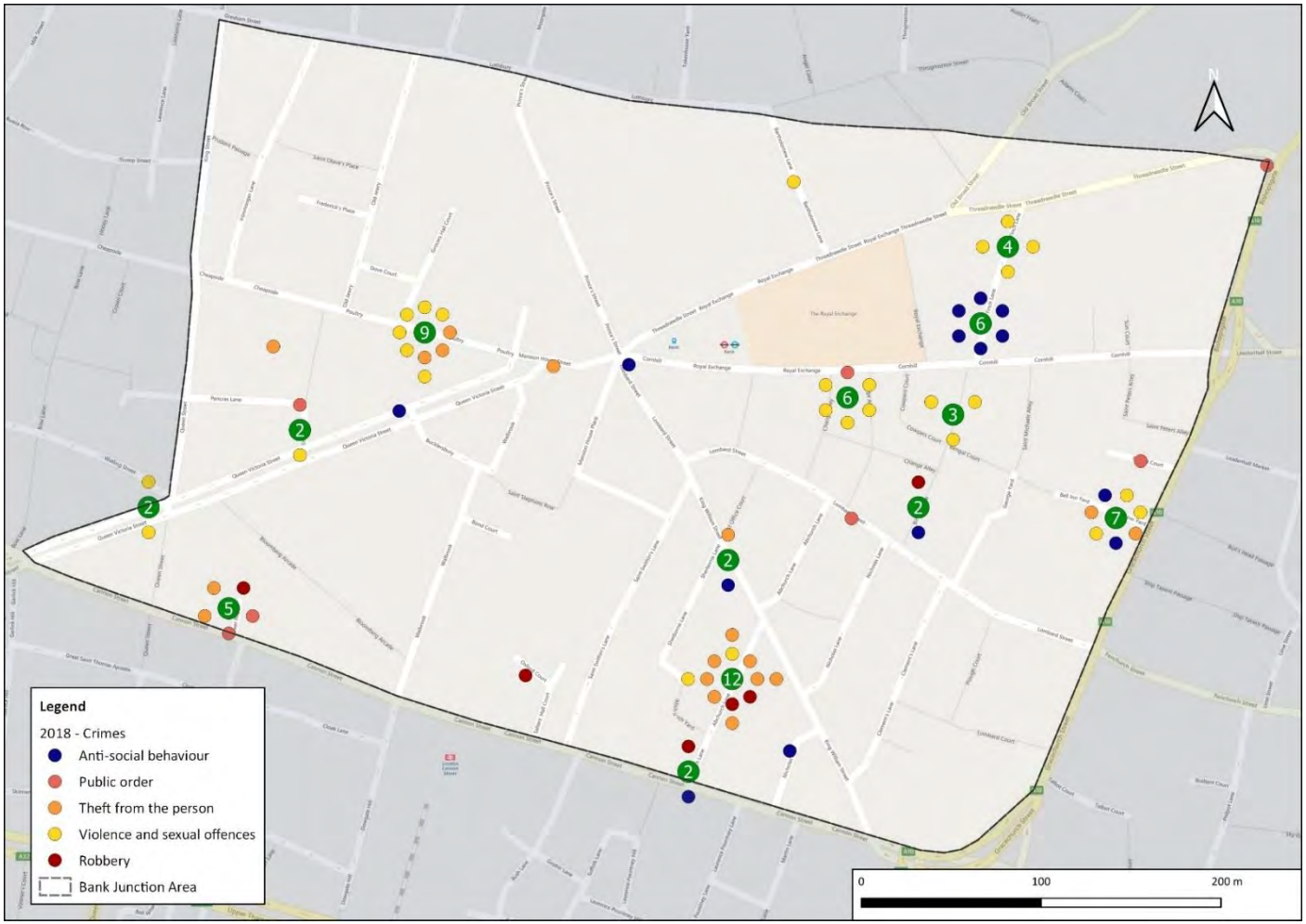
Basemap source: Bing Maps, 2024

Figure 5-8 Spatial distribution of relevant crimes, Bank junction, 2017



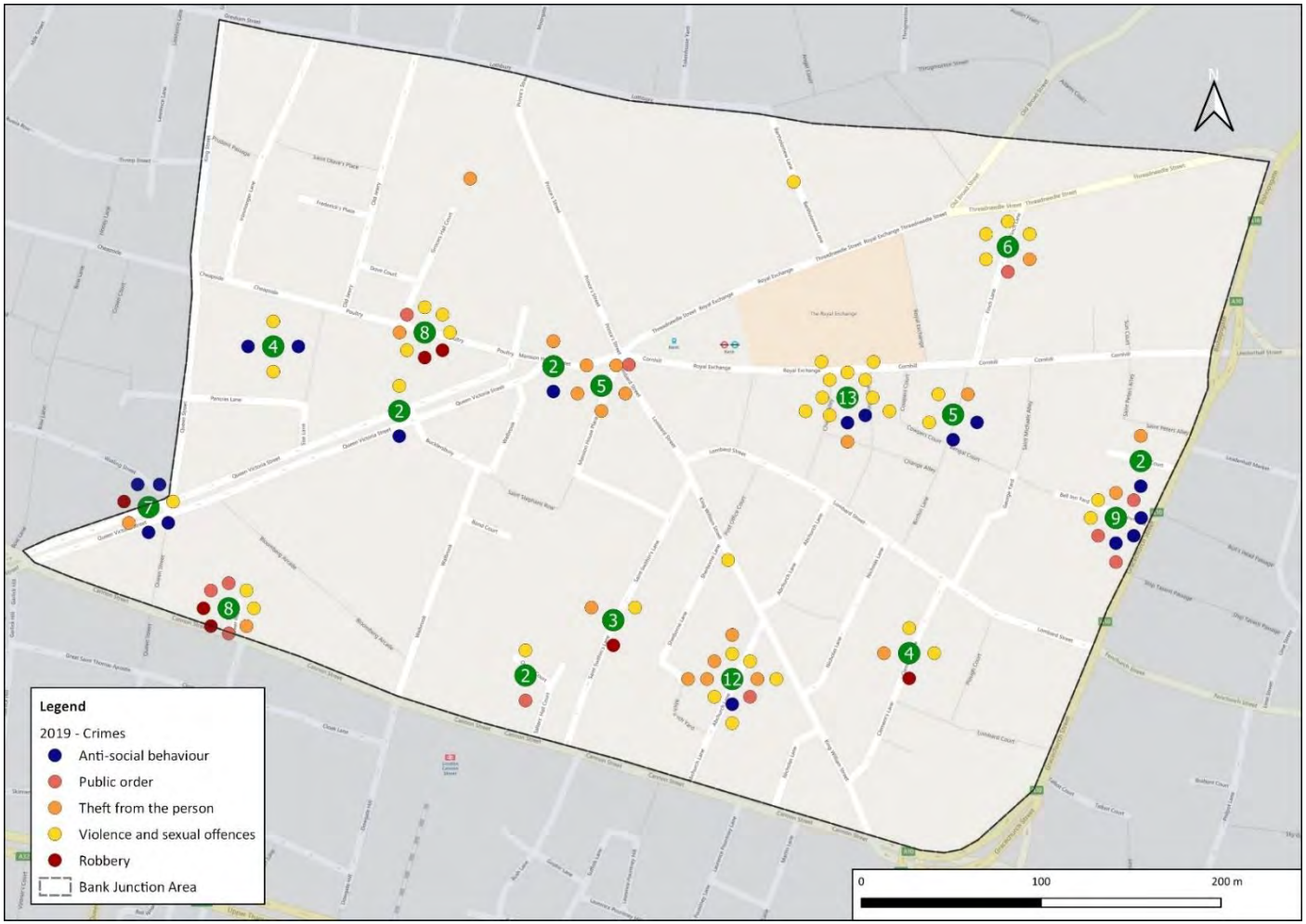
Bsaemap source: Bing Maps, 2024

Figure 5-9 Spatial distribution of relevant crimes, Bank junction, 2018



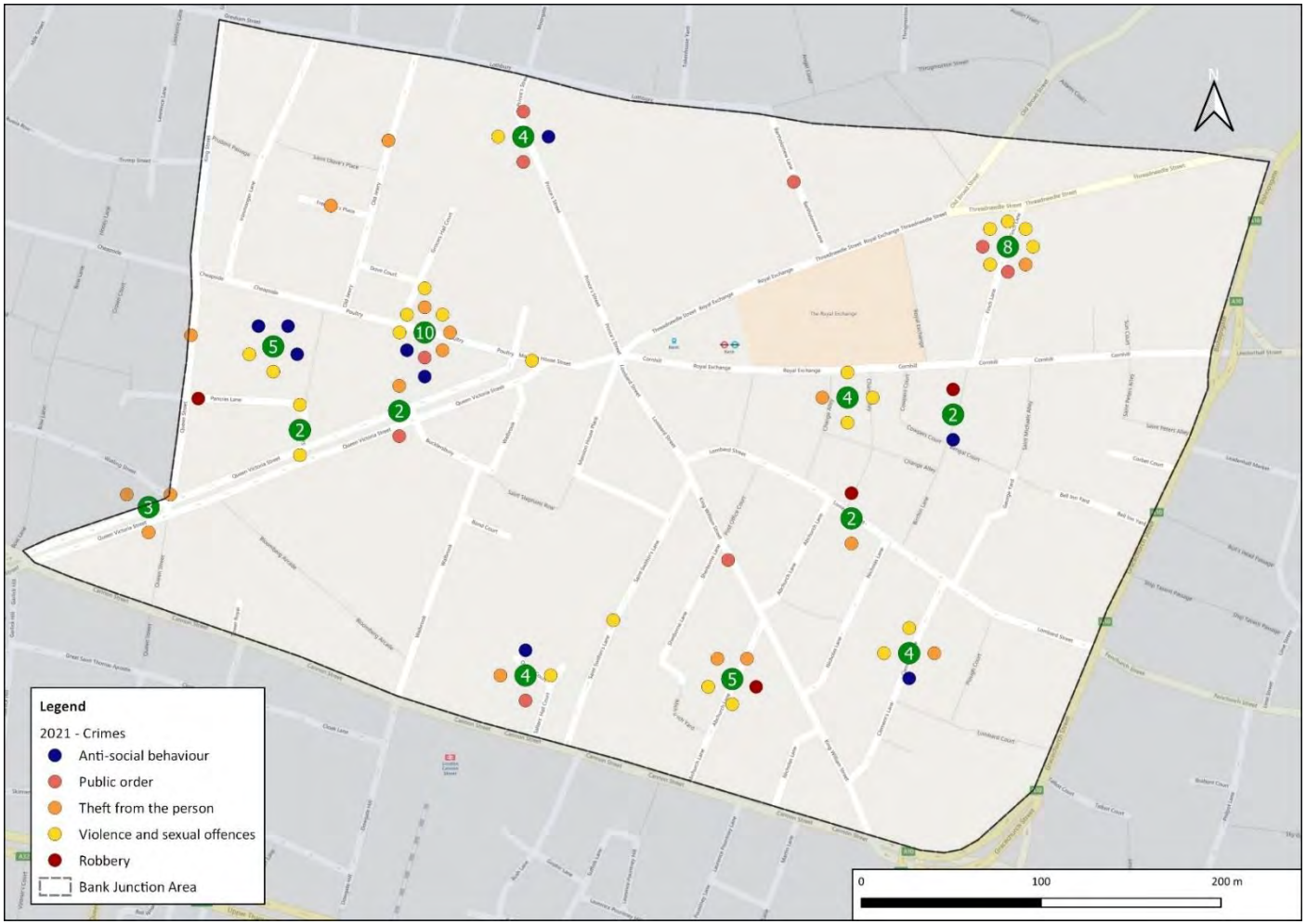
Bsaemap source: Bing Maps, 2024

Figure 5-10 Spatial distribution of relevant crimes, Bank junction, 2019



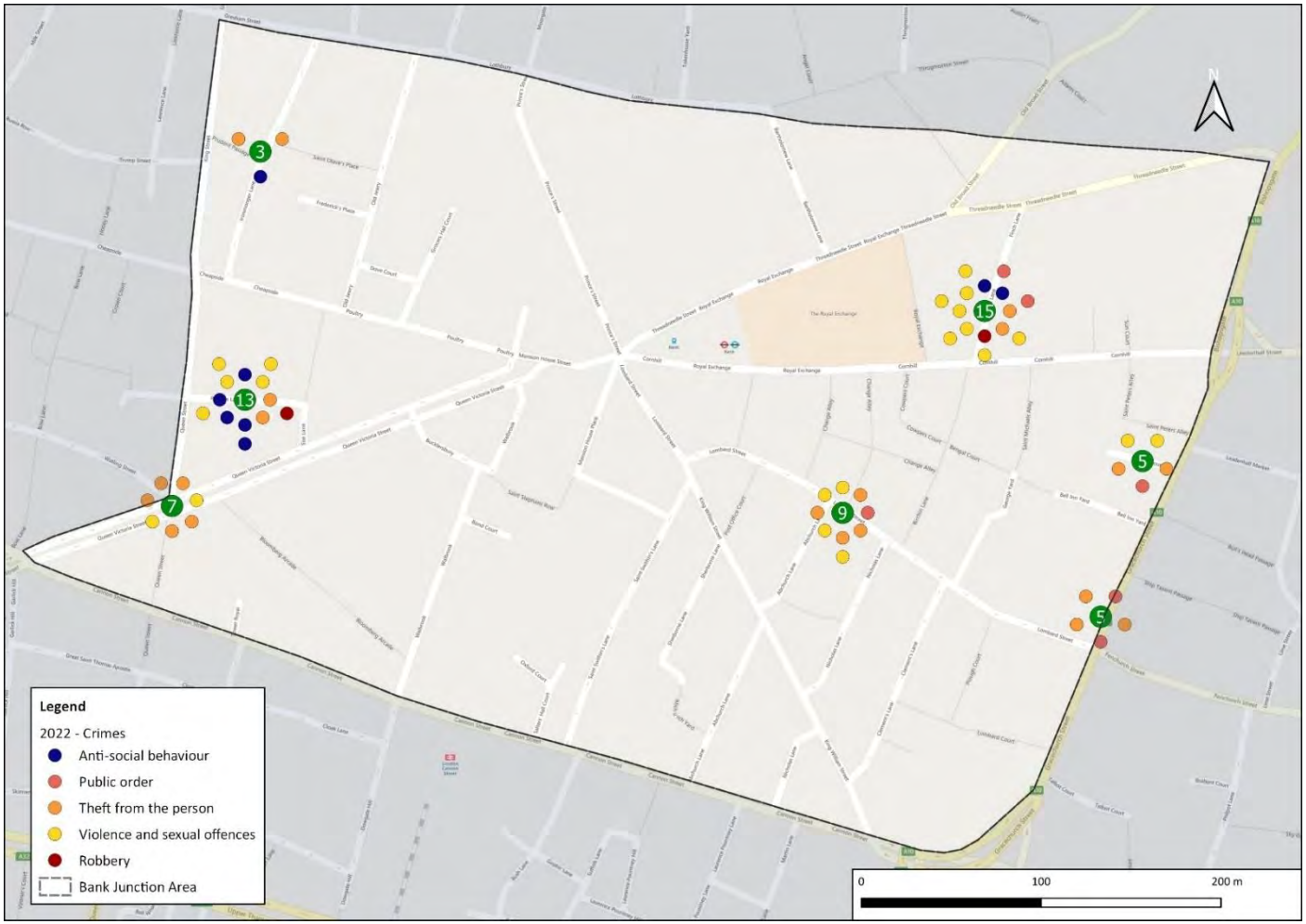
Bsaemap source: Bing Maps, 2024

Figure 5-11 Spatial distribution of relevant crimes, Bank junction, 2021



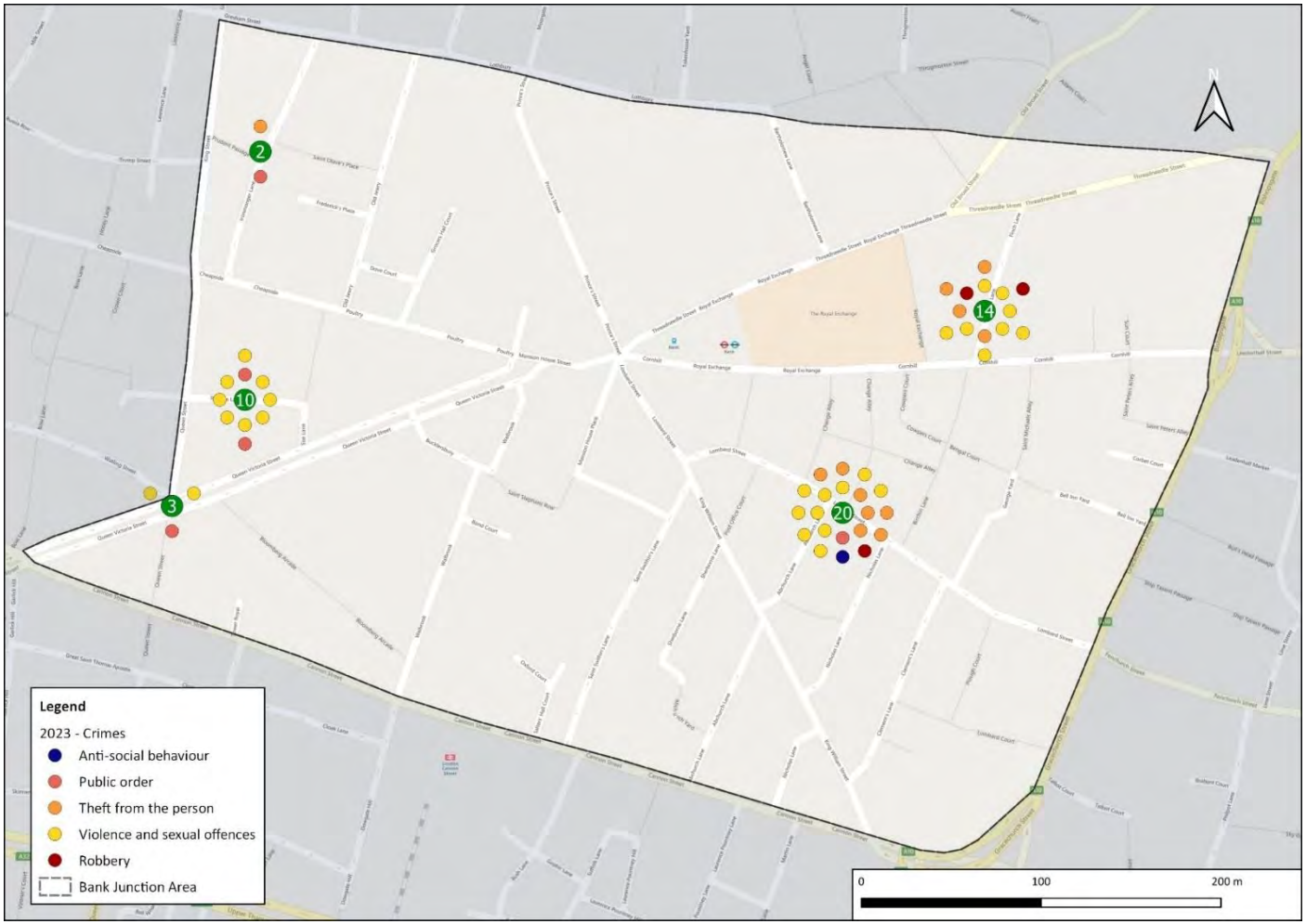
Bsaemap source: Bing Maps, 2024

Figure 5-12: Spatial distribution of relevant crimes, Bank junction, 2022



Bsaemap source: Bing Maps, 2024

Figure 5-13: Spatial distribution of relevant crimes, Bank junction, 2023



Bsaemap source: Bing Maps, 2024

6 Oyster Card Data

Introduction

6.1 The All Change at Bank scheme area includes the following bus stops, which serve the routes outlined in the table below. These bus routes connect Bank junction with north, east, central south-west and south London.

Table 6.1: Bus stops and routes serving the Bank junction area

Street Name	Stop Name	Route								
Princes Street	Bank Station/Princes Street (Stop A)	21	43	141						
Princes Street	Bank Station / Princes Street (Stop B)	21	43	141						
Cornhill	Bank Station / Cornhill (Stop E)	8	25	26	N8	N25	N26	N242	N550	N551
Cornhill	Bank Station / Cornhill (Stop D)	8	25	26	N8	N25	N26	N242	N550	N551
Cornhill	Bishopsgate City of London (Stop R)	8	25	26	N8	N25	N26	N242	N550	N551
King William Street	Bank Station / King William Street (Stop F)	21	43	133	141	N21				
King William Street	King William Street / Monument Stn (Stop G)	21	43	133	141	N21				
Poultry	Bank Station / Poultry (Stop K)	8	25	26	133	N8	N25	N26	N242	N550
Poultry	Bank Station (Stop L)	8	25	26	133	N8	N25	N26	N242	N550

Methodology

6.2 Oyster Card data, for passengers boarding the bus stops in **Table 6.1** above has been analysed, and the equality implications of these findings have been assessed.

6.3 This data is an average of passenger data, for the 20 weekdays from 18th September 2023 to 13th October 2023. Subsequently, this data reflects a recent profile of Oyster Card users within the Bank scheme areas, and of passengers using the routes outlined in **Table 6.1,** and does not include comparison before and after the introduction of the scheme.

6.4 To note, there is no ticket type disaggregation for departure load data, due to the way the occupancy data is scaled to account for non-inferred journeys. We do not have comparative

data for before / after the scheme so cannot compare the impact of the scheme compared to that prior implementation.

Analysis

Departure Loads

6.5 Analysis was undertaken to establish the average departure load of passengers for bus stops within the scheme area. On average, across the whole day, there is primarily a 'net loss' of passengers to bus stops within the Bank junction scheme area in comparison to the previous stop (see Figure 6-1 and Figure 6-2).

6.6 This indicates that more people alight buses than board buses within the Bank junction area. However, there are limitations to conclusions drawn from this analysis; whilst net departure load changes could appear low, this does not, for instance, necessarily relate to 'busyness' around a bus stop location. This is because a net gain/loss does not account for the potential exchange of passengers alighting and boarding the buses in equal proportion.

Figure 6-1 Average net change in passenger departure load from previous stop, for bus stops within the scheme area – Direction 1 (18th September 2023 – 13th October 2023)

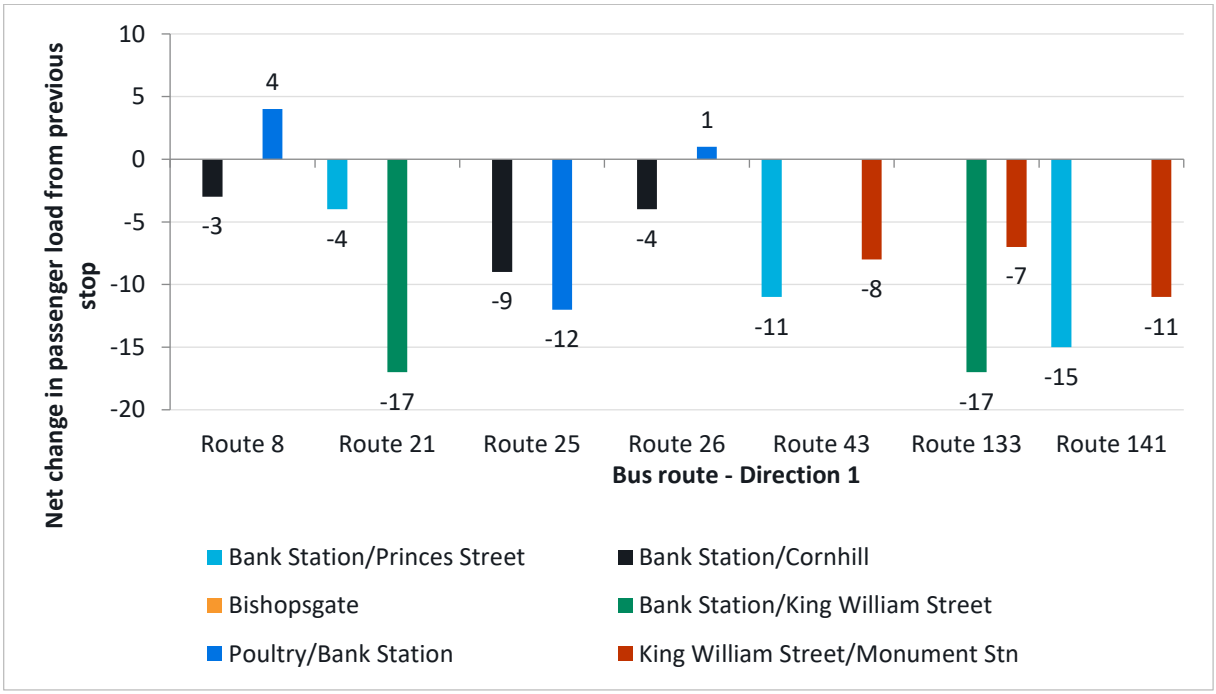
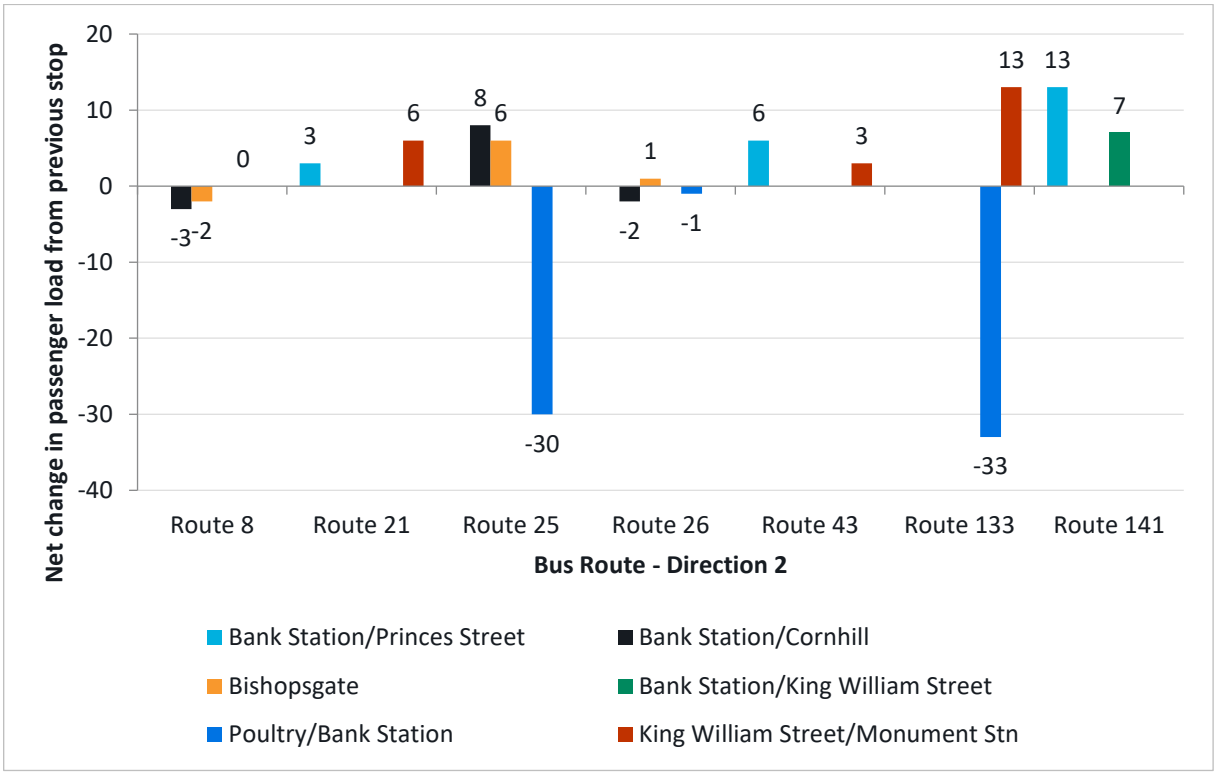


Figure 6-2: Average net change in passenger departure load from previous stop, for bus stops within the scheme area – Direction 2, (18th September 2023 – 13th October 2023)



Implications for EqIA

6.7 There are no specific implications that can be concluded by departure load analysis, as equalities data is not contained within the dataset. However, departure load analysis indicates that some bus routes have a greater 'net loss' and 'net gain' of passengers to the Bank area.

6.8 Greater pedestrian footfall in limited space can be less comfortable for disabled people, older people, pregnant women, or people travelling with young children, who may find navigating busier areas more physically challenging or stressful.

6.9 It is recommended that the public realm around these bus stop areas is reviewed to ensure that these spaces offer appropriate and comfortable space and amenities to facilitate boarding and alighting for all bus users.

Proportion of Oyster Card types used

6.10 Table 6.2 illustrates the proportions of the type of Oyster Card used to 'tap onto' buses within the scheme area. Oyster Card Types analysed include:

- Under 18 – Zip cards, Child Bus and Tram Passes and Young Visitor discounts on Oyster
- Freedom Pass Disabled
- Freedom Pass Elderly
- All Other Tickets – includes all other paper tickets, travelcards, 'Pay-as-you go' (PAYG) Oyster, Staff Passes and contactless payment cards (CPCs)

6.11 Where two bus stops have the same name, as they are on the same street, Oyster Card type use has been combined for these stops.

Table 6.2: Oyster Card type used at bus stops in Bank Junction area, (18th September 2023 – 13th October 2023)

Bus Stop	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
Bank Station / Princes Street	0.7%	6.9%	1.4%	91.0%
Bank Station / Cornhill	0.4%	3.4%	1.9%	94.3%
Bishopsgate	0.4%	2.6%	3.2%	93.7%
Bank Station / King William Street	0.3%	5.5%	2.3%	92.0%
Poultry / Bank Station	0.4%	7.2%	0.8%	91.6%
Proportion for all Bank junction bus stops	**0.4%**	**5.4%**	**1.8%**	**92.4%**

6.12 **Table 6.3** presents the proportions of Oyster Card type that is used to 'tap onto' all bus stops that are included on the routes which serve the Bank junction scheme area (see **Table 6.1**). This includes 664 bus stops which are located across north, east, central, and south London, which can provide a sample that can be used to compare Oyster Card usage across Bank.

Table 6.3: Proportion of Oyster Card types used at all bus stops on the routes serving the Bank junction scheme area (18th September 2023 – 13th October 2023)

Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
2.7%	10.0%	7.3%	80.0%

6.13 'All Other Tickets' is associated with the highest Oyster Card usage within the Bank scheme area, comprising 91 per cent – 94.3 per cent of usage at each stop. This is over 10 per cent higher than the proportion indicated in **Table 6.3**. Subsequently, proportions of other types of Oyster Cards are generally significantly smaller than those outlined in **Table 6.3.**

6.14 In addition, except for the Bishopsgate bus stop, Oyster Card type usage for bus stops within the Bank area follow the same ranking as outlined in **Table 6.3**. 'Freedom Pass Elderly' is the second highest proportion of usage, followed by 'Under 18', and then 'Freedom Pass Disabled' Oyster Card types. For Bishopsgate, Under 18 usage is slightly higher than Freedom Pass Elderly usage.

6.15 Some bus stops indicate a higher use of certain card types in comparison to other bus stops within the Bank scheme area. For instance, Freedom Pass Elderly Oyster Card usage is higher at Bank Station/King William Street, Bank Station/Princes Street and Poultry/Bank Station. Under 18 Oyster Card usage is higher at Bank Station/Cornhill, Bishopsgate, and Bank Station/King William Street.

6.16 Across all bus stops in the Bank scheme area, use of 'Freedom Pass Disabled' Oyster Card types is relatively low, comprising less than 1 per cent of use. The highest proportion of use by this type of Oyster Card was at Bank Station/Princes Street.

Proportion of Oyster Cards used, by time of day

6.17 The following analysis assesses the usage of different Oyster Card types across bus stops in the Bank scheme area by the following time periods:

- **AM Peak**: 07:00 to 10:00
- **Interpeak**: from 10:00 to 16:00

- **PM Peak**: from 16:00 to 19:00
- **Off Peak**: all other times

Table 6.4: Proportion of Oyster Card types used at all bus stops in the Bank junction scheme area, by time of day (18th September 2023 – 13th October 2023)

Time	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
AM Peak	0.3%	1.8%	1.1%	96.7%
Interpeak	0.7%	9.9%	2.2%	87.3%
Off Peak	0.4%	3.4%	1.6%	94.7%
PM Peak	0.4%	5.6%	1.9%	92.1%

6.18 The following illustrates the proportions of Oyster Card type that is used to 'tap onto' all bus stops that are included on the routes which serve the Bank junction scheme area, by time of day. This again provides a sample that can be used as benchmark for comparing Oyster Card usage in Bank, by time of day.

Table 6.5: Proportion of Oyster Card types used at all bus stops on the routes serving the Bank junction scheme area, by time of day (18th September 2023 – 13th October 2023)

Time	Freedom Pass Disabled	Freedom Pass Elderly	Under 18	All Other Tickets
AM Peak	1.9%	4.0%	11.8%	82.3%
Interpeak	4.4%	17.5%	7.9%	70.2%
Off-Peak	1.7%	5.0%	2.6%	90.7%
PM Peak	2.4%	10.0%	8.2%	79.5%

6.19 Comparison between **Table 6.4** and **Table 6.5** indicates that 'all other tickets' usage comprises the highest proportion of Oyster Card usage, throughout the day. Use of Freedom Pass Elderly and Freedom Pass Disabled Oyster Card types is highest at the interpeak period, but this is still lower than the proportions outlined by all bus stops on the routes serving the Bank junction scheme area.

6.20 The following Bank junction bus stops indicate notable increases (>+3% from **Table 6.4**) in the proportion of Oyster Card type usage during the following time periods, in comparison to the Bank junction average. For this analysis, bus stop direction has been considered as notable changes were evidenced by route direction.

Table 6.6: for Bus stops within the Bank junction area, that have a higher than average proportion of concessionary travel, by time of day, and bus route direction (18th September 2023 – 13th October 2023)

Stop Name	Direction	Time	Card Type	Percentage
Bank Station / Princes Street	1	Interpeak	Freedom Pass Elderly	18.8%
Bank Station / Princes Street	1	Off-Peak	Freedom Pass Elderly	6.5%
Bank Station / Princes Street	2	Interpeak	Freedom Pass Elderly	12.8%
Bishopsgate	2	Interpeak	Under 18	7.2%

6.21 To note, Bank Station/Princes Street, Direction 1 in the AM Peak recorded the highest proportion of Freedom Pass Disabled bus users in the Bank junction area. 2.3 per cent of users were recorded using this Oyster Card type, which is higher than the average recorded across Bank junction bus stops.

Implications for EqIA

6.22 Overall, in comparison to the comparative sample of Oyster Card usage across London, there is a lower use of concessionary Oyster Card types by people boarding bus services within the Bank junction area. This is likely due to factors that are not linked to the All Change at Bank scheme. For instance, as outlined in the Baseline evidence of the February 2023 EqIA report, there is a significant working population across the CoL, which is estimated to be approximately 68 times the usual CoL resident population. The most common age group of the Bank junction Workplace Zone is 30 -34. As such, it could be expected that there is a smaller proportion of concessionary travel to and from the area during weekdays by people with Under 18 and Freedom Pass Elderly Oyster Cards in comparison to people using 'All Other Tickets'.

6.23 However, at locations where higher proportions of concessionary travel has been identified, the public realm around these bus stop areas could be reviewed to ensure that these spaces offer appropriate and comfortable space and amenities to facilitate boarding and alighting for all bus users.

6.24 In addition, analysis indicates that use of Freedom Pass Elderly (9.9 per cent), Freedom Pass Disabled (0.7 per cent) and Under 18 (2.2 per cent) Oyster Card types is the highest during the interpeak period. This indicates that these users may experience positive impacts as a result of 7am – 7pm motor restrictions. Reduced road congestion can improve bus journey time and reliability, and passenger experience[20]. At a national scale, higher bus use is reported amongst older people; in particular, by older women[21]. As such, measures which support bus priority within the Bank junction area could presents a positive impact for these user groups, which may benefit as a result of the restrictions.

6.25 It is recommended that bus journey times within the Bank junction area are regularly monitored to evaluate whether the restrictions enable more reliable journey times as a result of reduced road congestion.

[20] https://www.cpt-uk.org/media/fe0ebaaj/bus-priority.pdf

[21] https://www.gov.uk/government/statistics/annual-bus-statistics-year-ending-march-2023/annual-bus-statistics-year-ending-march-2023

7 Recommended Further Actions

7.1 Based upon the analysis undertaken in this Technical Note, the following actions are recommended:

- **Monitoring:** If any change is made to the existing traffic restrictions at Bank junction, it is recommended this change is implemented on an experimental basis, and that the CoL continues to monitor the scheme's impact through their existing monitoring and evaluation framework. This will provide scope to review the impact of the restrictions on equality, and potentially make amendments to the scheme if the impacts are deemed to be extensive and disproportionate.
- **Engagement with affected taxi users:** Where possible, engagement with affected taxi users (who rely on taxis as an essential mobility option) through existing channels of communication would allow CoL to gain a deeper understanding of the specific challenges taxi users face and tailor any potential amendments to better address their needs.
- **Ongoing dialogue with City of London Police**: It is recommended that there is ongoing dialogue between The City of London Corporation and The City of London Police so that the Police can respond appropriately to sudden or disproportionate changes to crime trends in the Bank junction area, when compared to historic trends, or when compared to the wider CoL.

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