



The Licensed Taxi Drivers' Association
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Department of the Built Environment
City of London Corporation
PO Box 270
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To Whom It May Concern,

Reference DBE/CT/TMO-GL- Response to Bank Junction Experimental Traffic Order

The Licensed Taxi Drivers' Association (LTDA), the major representative body for London's 25,000 taxi drivers, would like to **object** to the experimental traffic order as it currently stands relating to Bank Junction, and to formally request its **amendment** to permit taxis to use Bank Junction (alongside buses and cycles).

The LTDA, whilst supporting change to improve overall safety at Bank Junction, has believed throughout the duration of the trial that excluding taxis is an ill-conceived response to the challenges that the road network in the area is facing. We therefore request amendment of the measures on a trial basis, so that the impact of allowing taxis to use certain limited routes through the junction can be properly assessed.

Taxis are a vital part of our public transport mix. They are the lifeblood of the City of London and a vital means of transportation for the business community, people with limited mobility and many others. It is our belief that the benefits which the current measures have secured, such as significant improvements to the safety of the junction and shorter journey times for buses, could be maintained whilst allowing taxis to continue to use the junction and thereby fully serve the City of London's community.

In April 2017, the LTDA appointed transport specialists BWB Consulting to evaluate the City of London Corporation's rationale for excluding taxis from the junction, as well as measuring its impact on the taxi trade and wider traffic conditions. BWB's full report, which is attached as an appendix to this response, has formed the basis for the LTDA's response to this consultation. The key findings are set out below:

An over-estimation of the number of taxis using the junction:

- Traffic surveys undertaken on behalf of BWB and the LTDA have shown that the City of London Corporation used an out-of-date assessment of the number of taxis using Bank Junction for its modelling, thus overstating the impact that the inclusion of taxis within the trial would have.
- The data relied upon by the City of London Corporation as its evidence base for the measures was collected in 2014. The data concluded that there were a total of 5,897 licensed taxi movements through Bank Junction. Data collected on behalf of BWB in April/May 2017 prior to the commencement of the trial showed that the number of journeys had in fact dropped by 28.9% (4,192 licensed taxi movements).

- The traffic modelling and projections made to justify the exclusion of taxis from the junction are therefore flawed, given that they are based on now out-of-date survey results and an overestimation of the volume of taxis which ordinarily would use the junction.

Prior to the trial, taxis were one of the safest modes of transport using the junction:

- An in-depth review of the incident data provided by TfL indicates that of the total 88 incidents recorded in the five year period from 2011-2016, 11 involved a taxi or private hire vehicle (PHV) and 10 were considered attributable to either the taxi or PHV's driver or passenger based on the notes taken by Metropolitan Police at the time of the incidents. Of these incidents, none resulted in more than a slight injury.
- It is important to recognise also that these statistics do not separate licensed taxis (Hackney Carriages) and private hire vehicles. The LTDA is for example not aware of any collisions involving a licensed taxi at Bank Junction, and none of the notes taken by the Metropolitan Police record the involvement of a licensed taxi either.
- Research indicates that 26.4% of the total number of taxis/PHVs were Hackney Carriages midway during the study period, so it is possible to estimate that there was a maximum average of one Hackney Carriage-attributable slight injury every two years prior to the implementation of trial restrictions.
- By comparison 11 incidents involving buses / coaches were recorded during the same study period. Of these, four were considered attributable to the buses involved. Three of these resulted in slight injury while one resulted in serious injury.

The trial has caused a reduction in the availability of taxis in the wider Bank area:

- Surveys conducted using ANPR cameras to track taxis entering a cordon around the wider Bank area show a significant decrease in the overall volume of taxis in the area.
- Data gathered in September 2017 found that there had been a 49% reduction since the implementation of the trial, reducing the availability of taxis to transport users (including vulnerable users who rely on the full accessibility of a taxi to get around) and causing serious damage to the industry in an area of London in which there is high demand.
- Such a method for measuring the availability of taxis in the Bank area is far more accurate than surveys of taxis available at ranks and wait times, as it indicates the true total volume of taxis within the wider area, and includes taxis undertaking journeys, waiting at ranks and plying for hire.

Increased journey times through the area for taxis:

- ANPR data shows that journey times for taxis travelling through the wider Bank area have increased by 21% on average. This implies that the measures have contributed to an increase in congestion in the wider area, presenting significant air quality and road safety issues, in addition to making travelling in the City of London less convenient.
- The LTDA also utilised a survey car with GPS equipment to measure the impact of the changes on journey times for a number of specific key licensed taxi routes which previously ran through or close to the junction. GPS and journey time data indicates that travel times on these routes increased by an average of 54%.

Mitigation measures which undermine safety and improved traffic flows:

- Although three new taxi ranks have been established by the City of London in close proximity to the junction on Prince's Street, Cornhill and Queen Victoria Street as an attempted mitigation measure, we believe that these have had a negative impact on traffic movement in the area.
- These ranks force taxis to undertake a potentially hazardous U-turn movement to avoid the junction, negatively impacting traffic speeds through the area.

A comment on the City's monitoring of the trial:

- In attempting to monitor the impact of the trial on the taxi trade, the City has undertaken its own surveys on taxi journey times, fares and rank use.
- The LTDA and our transport consultants have some concerns around the journey time data collected by the City, given that they were gathered using a 'mystery shopper' method, utilising a data set of only around 90 journeys, and all journey times in the data produced appear to be rounded to the nearest minute.
- In contrast, BWB's assessments of journey times used ANPR cameras, recording journey times in seconds for several thousand taxi trips through the Bank area.

Improvements in bus journey times:

- Both ANPR data collected on behalf of the LTDA and iBus data released by TfL has indicated that the Bank Junction measures have resulted in improved journey times for buses.
- Analysis of the ANPR data showed that overall, bus journey times have improved by a weighted average of 16 seconds as a result of the scheme. If licensed taxi traffic were re-permitted to the junction, it is estimated that improvements to bus journey times would still have improved by approximately 13.4 seconds.
- Data released by TfL shows even more substantial improvements in journey times for buses. It is hypothesised that this is because CLC considered the change in TfL bus journey times across each route's entire length rather than just the junction. As a result, the changes in bus journey times CLC highlight reflect highway conditions across each bus's entire route, rather than reflecting just the impact of trial restrictions.
- Given these even more substantial improvements than our analysis recognised, it is reasoned that the re-permission of taxi traffic to the junction would have even less impact on TfL bus journey times than previously indicated.
- In fact, the re-permission of licensed taxi traffic to the junction may mean greater improvements in bus journey time by eliminating the need for licensed taxis to complete obstructive and potentially dangerous U-turn manoeuvres in order to exit newly-established taxi ranks.

Allowing taxis to use a limited number of straight-through routes at Bank:

- The LTDA concludes, on the basis of the evidence gathered to date, that the continued exclusion of licensed taxis from Bank Junction is unjustifiable and has had harmful consequences on both the taxi trade and the local transport network in the City of London.
- We respectfully request that the City **amend the trial order** to temporarily allow taxis to use Bank Junction, alongside cycles and buses, so the impact can be properly assessed and a solution found that meets the needs of all road and transport users.



- Surveys of taxis using Bank Junction prior to the implementation of the trial identified that the most common routes used by taxis were direct journeys across the junction, rather than directions that involved a turning movement.
- The LTDA therefore requests, that on a trial basis, direct routes across the junction are permitted for taxis on a limited number of east-west and north-south routes on a 'straight ahead only' basis.
- Permitting straight-through routes would not increase the risk of conflict with other road users through turning movements, nor would it cause a significant slowing impact.
- It is the view of the LTDA and our transport consultants that the benefits of the experimental trial in terms of safety and bus journey times can be maintained with taxis allowed to use junction in this way.

Conclusion

The LTDA has worked collaboratively with the City of London Corporation throughout the implementation of the measures at Bank Junction to assess their impact. It is now clear that the trial has had a significant negative impact on the taxi trade, our passengers and the wider travelling public. We hope that the City of London will now look again at the exclusion of taxis from Bank Junction and work with the LTDA to find a solution that balances the improvements made with the need to allow taxi access to this vital area in the heart of the City.

I look forward to receiving a formal response.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Richard Massett". The signature is written in a cursive style and is positioned above a horizontal line that serves as a separator.

Richard Massett

Chairman of the Licensed Taxi Drivers' Association