

# FARRER & Co

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15 January 2016

By Special Delivery  
By Email: Paul.Beckham@camden.gov.uk

Dear Sirs

## **The Imperial London Hotels Limited v London Borough of Camden CO/6397/2015**

We received the Council's Acknowledgement of Service, Application Notice and accompanying witness statements on 12 January. We note that the witness statement of Ms Shah confirms that the Council does not intend to set out its defence to the Claim at this stage, so we are unable to respond to the merits of any defence.

We originally requested in our letter of 23 November 2015 a copy of any survey material obtained before the Order came into force, we requested this information within 7 days notwithstanding the request under the Freedom of Information Act 2000. The information was eventually provided on two memory sticks supplied by the Council, one that arrived at our offices on 18 December and the other that was delivered to us on 24 December.

Our clients transport consultant Mr Russell has reviewed these documents supplied by the Council and notes that there is reference to the information listed below, which has not been provided on the memory sticks. This of course further delays any review of the data and restricts Mr Russell's ability to fully appraise the transport and traffic justification for the Order.

1. Report entitled: "Tavistock Place / Torrington Place – Westbound Closure between Judd Street and Gower Street" (referred to in Transport for London's Scheme Impact Assessment decision letter of 4 November).

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2. Detailed traffic modelling to assess the traffic impacts of the West End Project (referred to in the first paragraph of Appendix H of the Cabinet Report reference CENV/2014/20 dated 21 January 2014).
3. All of the information referred to in Appendix A of the "Torrington Place to Tavistock Place Experimental Traffic Changes Combined Stage 1 & 2 Road Safety Audit" ref: 1254-RSA-01 and dated 9th October 2015.
4. Designers response and Client Organisation comments to the "Torrington Place to Tavistock Place Experimental Traffic Changes Combined Stage 1 & 2 Road Safety Audit" ref: 1254-RSA-01 and dated 9th October 2015.
5. Details of the assessment of potential mitigation for Torrington Place (referred to in the third from last paragraph of Appendix H of the Cabinet Report reference CENV/2014/20 dated 21 January 2014).
6. All traffic modelling work relating to Tavistock Square, Russell Square, Endsleigh Street and Bedford Way including the assessment of junction performance (current transport network and future transport network which includes the West End Project traffic changes) before and after the introduction of the experimental traffic order at junctions along these routes and in particular at the junctions of Tavistock Square (southeast) / Woburn Place, Endsleigh Place / Upper Woburn Place, Endsleigh Place / Endsleigh Street and Tavistock Square / Gordon Square / Bedford Way. Although this appears to be included as exhibit SS5 to Simi Shah's witness statement, it is in fact illegible as the plans are not capable of being interpreted.
7. A copy of the feasibility study referred to in paragraph 27 of Appendix D of the Cabinet Report reference CENV/2014/20 dated 21 January 2014.
8. Details of the methodology for undertaking the parking and loading surveys undertaken by Capital Traffic on 28 November 2013 and 3 December 2013 together with clarification of what each drawing provided represents (each drawing has the same Project, Title and Drawing Number reference).

To be able to fully appraise our client and the Court of the relevant facts, it is vital that the information listed above is provided before a response to the Councils Acknowledgement of Service

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can be filed. For this reason we seek your agreement to extend the time for our response to 14 days from receipt of all of the documents listed above. Please can you let us have your response by 5.00pm on Monday 18 January?

Yours faithfully

*Farrer & Co*