



Date: 18 January 2016
 Your Reference: KKP/80726/5
 Our Reference: CLS/LIT/PB/142.75
 Enquiries to: Paul Beckham

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By email only

Dear Sirs,

**Re: The Imperial London Hotels Limited
 Claim for Judicial Review of The Camden (Prescribed Routes
 Waiting and Loading Restrictions and Parking Places) (No.1) Experimental
 Traffic Order 2015**

We refer to your letter dated 15 January 2016 requesting the Council's agreement to extend the time for your response to our Acknowledgement of Service by 14 days. We confirm that Council is agreeable to an extension for you to respond by 1 February 2016.

In response to the additional information requested, we provide the following:

1. The 'Tavistock Place/Torrington Place – Westbound Closure between Judd Street and Gower Street' report was included as "Exhibit SS5" to the witness statement of Simi Shah. A copy is enclosed for your records.
2. The detailed traffic modelling referred to in the first paragraph of Appendix H of the Cabinet Report reference CENV/2014/20 is the property of Transport for London ("TfL") and Council does not hold the executable model used to run various traffic scenarios as this model is in the possession of TfL. As such, the Council is unable to provide you with a copy of this documentation.
3. Please refer to the following enclosed as 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":

Drawing Number

DTO/003 Rev A
 DTO/003 Rev C
 DTO/003 Rev A
 N/A

N/A

Drawing Title

JO2/063 Woburn VA
 JO2/063 Woburn VB
 Taxi Rank Option 1
 Torrington to Tavistock Experimental
 Traffic Changes
 Zebra Crossing Detail

Borough Solicitor
Andrew Maughan

4. Please find enclosed the 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. A number of options were looked at for potential mitigation for Torrington Place/Tavistock Place in terms of where to change the flow of traffic which would remove through traffic in the westbound direction. Consideration given to the impact on neighbouring streets and safety. Two options were drawn up and are enclosed as follows:
 - a. 7_Stations Proposals Option 1; and
 - b. 7_Stations Proposals Option 2.

The approved option is considered most appropriate as it is:

- Safer for vehicles to turn left into Torrington Place from Gower Street than at Malet Street where the right turn conflicts with a zebra crossing outside the UCL entrance
 - Gower Street / Torrington Place junction is governed by signals as opposed to Malet Street junction with Torrington Place and Byng Place
 - A shorter and more convenient eastbound route for motorised vehicles which would remain as the existing on street arrangement.
6. This traffic modelling was undertaken by TfL and the report produced by them was included as "Exhibit SS5" to the witness statement of Simi Shah. A copy is enclosed for your records. The actual traffic model is held by TfL and as such Council is not in possession of this.
 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. The feasibility study work undertaken is as outlined in paragraph 5 above.
 8. The following methodology was used for the parking and loading surveys undertaken by Capital Traffic on 28 November 2013 and 3 December 2013:
 - 69 separate areas of parking data were collected for every 15 minute period between the hours of 06.00 to 22.00.
 - The company used to capture the video footage used a total of 9 cameras to capture Tavistock Place/Torrington corridor (between Judd and Tottenham Court Road).
 - On 15 metres returns into the side roads, the consultants have only included a bay if it is fully within the 15 metres.
 - Any bays that only partially fell into the 15 metre length were not included (e.g Huntley Street, Chenies Mews, Ridgemount Gardens, Gordon Square and Herbrand Street), because it is reasonable to expect for users utilise side streets to load and unload.

Drawings should be read using the respective titles which identify the times for which the parking and loading locations are shown, together with the key for identifying the type of vehicle that is parked.

We hope this is satisfactory.

Yours faithfully



Paul Beckham
Lawyer
For the Borough Solicitor