

# FARRER & Co

For the attention of Paul Beckham Esq  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9LP

Your Ref: 1781.578  
Our Ref: KKP/80726.5  
Tel: 020 3375 7297  
Fax: 020 7430 1885  
Email: karen.phull@farrer.co.uk

20 January 2016

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

Dear Sirs

## **The Imperial London Hotels Limited v London Borough of Camden**

We refer to your letter dated 18 January 2016 and enclosures. We are grateful to your agreeing the extension for our response to 1 February 2016. In the meantime our client's transport consultant has reviewed the enclosures with your letter and has the following comments/requests. For convenience we have retained the numbered paragraphs in your letter:-

2. Our clients transport consultant Mr Russell spoke with Transport for London (TfL) to obtain the detailed traffic modelling. TfL were not sure if the modelling work for the West End Project had been undertaken by them at the instruction of the Council or if TfL had audited modelling work undertaken by the Council's consultants. TfL are to respond to Mr Russell to confirm this. In either case the Council's authorisation would be required to release this information to Mr Russell. We would be grateful if you could please contact Andrew Ulph at TfL and request that he do so immediately. Mr Ulph's email address is andrew.ulph@tfl.gov.uk
5. Please can you explain and provide the analysis (including accompanying data, scheme plans and any alternative options considered) that led the Council to conclude that the mitigation for Torrington Place was to remove through traffic in a westbound direction.
6. We have reviewed Exhibit SS5 and experienced great difficulty in distinguishing between the different coloured band widths in figures 3 to 22 inclusive on pages 4 to 15 with the exception of figures 11 to 14. In respect of these figures please can you provide the number

Farrer & Co LLP 66 Lincoln's Inn Fields London WC2A 3LH Telephone +44 (0)20 3375 7000 Facsimile +44 (0)20 3375 7001

DX 32 Chancery Lane Website [www.farrer.co.uk](http://www.farrer.co.uk)

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of vehicles that inform the flow changes and result in the appropriate colour and thickness of band width.

In respect of figures 11 to 14 inclusive and figures 22 to 25 inclusive (on pages 17 to 19) please provide a summary of the actual junction performance and include V/C, queue length and vehicle delay values. You will note that there are duplicates of figures 22 to 24 so we have referred to page numbers for clarity.

7. Please confirm that the entire feasibility study is comprised of the 2 options called "7\_Stations Proposals Option 1" and "7\_Stations Proposals Option 2". We note that paragraph 5 of your letter dated 18 January 2016 summarises the Council's rationale for selecting the option, please confirm whether or not there was a report setting out all of the feasibility work undertaken including other options to removing westbound traffic. If so please provide a copy.
8. In respect of your first two bullet points please confirm whether you have captured snapshot data taken every 15 minutes in each hour or whether the Council collected data continuously throughout each hour from 0600 to 2200.

In view of our commitment to respond to the Court by 1 February we would be grateful if this information could be provided no later than 5.30pm on Thursday 21 January. We look forward to hearing from you.

Yours faithfully

Farrer & Co