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 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 20 January 2016 setting out further queries from your client's transport consultant in relation to the information our office provided on 18 January 2016.

We would point out that the Council has disputed the Court's jurisdiction to consider your client's claim. The current issue between the parties relates purely to the time limit for bringing your client's claim. Under CPR 11(7)(c) and (9) the Council is not under any obligation to put forward its defence on the merits until after the issue of jurisdiction has been determined. The Council has, however, provided a substantial amount of information on a voluntary basis, both by way of background to its application and under cover of our letter dated 18 January 2016. Within this context, your client's request for further detailed traffic modelling, data, plans, feasibility studies etc at this stage of the proceedings is disproportionate.

On a voluntary basis, the Council provides the following further information in response:

2. The modelling was undertaken by TfL using the Operational Network Evaluator ("ONE") model which is a strategic model to help understand the wider impact of the West End Project in terms of reassignment of traffic to other roads.

The model itself is held by TfL and the flow information was provided to Camden.

5. TfL's ONE model showed that traffic on Torrington Place between Gower Street and Tottenham Court Road was predicted to double with the implementation of the West End Project proposals.

The Council's design engineers and transport planners assessed the traffic counts at the Gower Street / Torrington Place junction. These showed that the increase in traffic was in the westbound direction because traffic wishing to use Howland Street and continue on through Westminster (as an alternative east-west route to Euston

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Road) currently uses Tottenham Court Road, but with the section of Tottenham Court Road south of Howland Street proposed to be bus and cycle only, it would need to approach from Torrington Place.

The Council formed the view that by limiting westbound traffic on Torrington Place between Gower Street and Tottenham Court Road, the traffic levels on Torrington Place would be likely to return to their current levels, following implementation of the proposals. In order to limit westbound traffic on Torrington Place, options for limiting westbound traffic were therefore considered further east.

6. We confirm as follows:

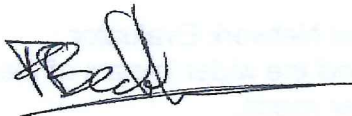
- The key shows different colour banding with associated flow ranges
- The thicker the band on the outputs, the higher the flows. These outputs come from the ONE model, which is not used to give junction performance results such as delay or V/C queue lengths but an indication of likely reassignment.
- Within the key the abbreviations Prt is for Public Transport and AP is analysis period.
- Strategic modelling is not carried out to give exact flow information but a predicted proportion of reassignment as a consequence of the proposals.

To help to resolve any additional queries about the modelling, TfL have stated that they would be happy for Mr Russell, your client's consultant, to visit TfL offices to discuss the modelling work carried out.

7. We are of the view that the Council has produced sufficient information on a voluntary basis at this stage.
8. The data on the plans show a snapshot taken every 15 minutes during the survey period of 06.00 to 22.00.

We trust this is satisfactory.

Yours faithfully



Paul Beckham
Lawyer
For the Borough Solicitor

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Andrew Maughan