



Date: 15 December 2015  
Your Reference:  
Our Reference: CLS/LIT/PB/1781.578  
Enquiries to: Paul Beckham

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By email and post

## RESPONSE TO JUDICIAL REVIEW PRE-ACTION PROTOCOL LETTER

Dear Ms Phull,

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

Thank you for letter of 04 December 2015 addressed to Mr Brookes concerning the above matter..

### 1. The Claimant

Imperial London Hotels Limited  
C/o Directors Office Imperial Hotel  
61/66 Russell Square  
London  
WC1B 5BB

### 2. The Defendant

London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9LP

### 3. Reference Details

CLS/LIT/PB/1781.578

### **Factual background**

Your client's ownership of the Tavistock Hotel, on the south side of Tavistock Place opposite Tavistock Square Gardens, of 30 Tavistock Place, also on the south side but further east along Tavistock Place, and of 37 Tavistock Place, still further east but on the north side of Tavistock Place, is noted. There is a two space taxi rank on the highway in front of the hotel adjacent to the pavement.

The Council is the local traffic authority for the purposes of the 1984 Road Traffic Regulations Act and the Traffic Management Act 2004.

Under the 2004 Act, the Council's duty is:

*...to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives—*

- (a) securing the expeditious movement of traffic on the authority's road network*
- (b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.*

### ***The Council's Transport Strategy 2011***

Following extensive consultation during January and February 2011, in August 2011 the Council published its Transport Strategy 2011-2031, setting out how it would deliver the Mayor of London's Transport Strategy 2010 ("MTS") and the Central and North Sub-Regional Transport Plans. Details can be found published on the Council's website, at <https://camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/camdens-local-implementation-plan/>.

Under the MTS, encouraging more people to cycle in is a key Mayoral priority. The MTS also proposes sustaining increases in the number of people walking. (See chapter 5.) <https://www.london.gov.uk/what-we-do/transport/transport-publications/mayors-transport-strategy>

The Council's objectives and strategies were summarised within the Executive Summary of its Transport Strategy at E3.1-3.10, materially as follows:

***Objective 1: Reduce motor traffic levels and vehicle emissions to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon and low waste borough.'***

*To meet this objective Camden proposes the following measures:*

...  
*Reducing traffic flows and encouraging a switch towards more sustainable travel*  
*A road user hierarchy that prioritises walking and cycling*

...

***Objective 2: Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden***

*How we will achieve this:*

...

*Improved pedestrian environment including better crossing facilities, seating and signage*

...

*Improved cycle routes with better signs*

...

**Objective 3: Improve road safety and personal security for people travelling in Camden.**

*How we will achieve this:*

*Improve pedestrian crossing facilities*

*Direct and comfortable routes for cyclists and advanced stop lines at signalised junctions*

...

**Objective 4: Effectively manage the road network to manage congestion, improve reliability and ensure the efficient movement of goods and people**

*How we will achieve this:*

*Limit the demand for motorised travel by enhancing facilities for walking and cycling*

...

Specific policies adopted by the Council and set out in chapter 5 of the Transport Strategy included as follows:

**Policy 1.2**

*The Council will continue to encourage travel by sustainable modes, reduce motor vehicle dependency and the dominance of motor traffic in the borough. The Council will aim to increase the permeability of streets and remove one-way gyratories.*

**Policy 1.3**

*Camden has a road user hierarchy for the borough, which will be used as a tool in developing projects, as follows:*

*Pedestrians*

*Cyclists*

*Public transport*

*Freight (including loading and unloading)*

*Taxis*

*Powered two-wheelers (motorcycles) and private cars*

*On-street parking*

**Policy 2.1**

*The Council will continue to encourage, promote and prioritise walking and cycling as the preferred modes of travel in the borough*

**Policy 2.11**

*Camden supports the Cycle Superhighway proposals and, in conjunction with TfL will provide complementary measures including cycle training, cycle parking and cycle facilities as well as links to local cycle networks and established LCN+ routes. Camden proposes investment towards other transport projects that will complement the proposed Superhighway route.*



**Policy 2.12**

*Camden will work with TfL, Camden's Cycling Champion, Camden Cycling Campaign, Sustrans and other stakeholders to continue to promote, develop and maintain the cycle routes across the borough as well as improve their legibility.*

**Policy 3.1**

*Camden will work closely with TfL, the Metropolitan Police and other stakeholders to improve safety for pedestrians by:*

*Providing safe and direct routes for pedestrians across the borough;*

*Providing improved pedestrian crossing facilities and improve the public realm environment to provide a safer pedestrian environment; ...*

**Policy 3.2**

*Camden will work closely with TfL, Councillors, Camden's Cycling Champion, Camden Cycling Campaign, the Metropolitan Police and other stakeholders to improve safety for cyclists across the borough by:*

*Providing direct and safe routes for cyclists across the borough, improving existing and developing new cycle facilities where possible; ...*

**Policy 4.1**

*Camden will continue to manage congestion on the road network through encouraging mode shift away from motor vehicles to modes that have less impact on "road space" whilst recognising the needs for reliable and efficient freight and bus services and the role of the strategic road network.*

At chapter 6 the Transport Strategy identified Fitzrovia/Tottenham Court Road as part of its three year programme of investment for the Corridors, Neighbourhoods and Supporting Measures programmes:

*Fitzrovia - Public realm improvements to complement potential major scheme for Tottenham Court Road. Investigate road safety measures, 2-way working for cyclists (lightweight measures) on one-way streets, Legible London, street trees, bicycle parking, decluttering, waiting/loading review and possible removal of traffic signals.*

It also set out a proposed programme of investment in Major Schemes, including:

*West End Project - Significant improvements to the public realm and introduction of two-way traffic for Tottenham Court Road and Gower Street. The wider West End scheme also includes proposals for Euston Circus at the northern end of Tottenham Court Road*

Further details of the proposed West End Project were set out at paras 6.62-6.64 at pp.173-175.

**Mayoral cycling policy**

In March 2013 the Mayor of London published the Mayor's Vision for Cycling in London. Its key outcomes were: 1. A Tube network for the bike, 2. Safer streets for the bike, 3. More people travelling by bike and 4. Better places for everyone.

From December 2013, the Mayor of London consulted on a proposed Central London Grid for cycling: see at <http://content.tfl.gov.uk/plugin-central-london-grid.pdf>.



The proposed cycle grid included a cycle quietway along a route including Torrington Place and Tavistock Place.

From February 2014 the Council published details of the proposed routes of the Central London Cycling Grid within its area on its website at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/cycling-and-pedestrians/central-london-cycle-grid/>

### *The West End Project*

During March 2014 pre-consultation engagement on the West End Project took place with local groups and businesses at the Bloomsbury Area Action Group as part of a wider programme of pre-consultation engagement. Following this, there was very extensive consultation including local and national media coverage, linked in with online consultation via the Council's website. It is correct that the area to which flyers was distributed did not extend as far east as Tavistock Place. The consultation is summarised at: [http://democracy.camden.gov.uk/documents/s39037/Item%2016%20-%20Appendix%20A%20headline%20consultation%20results%20and%20discussion%208\\_01\\_15.pdf](http://democracy.camden.gov.uk/documents/s39037/Item%2016%20-%20Appendix%20A%20headline%20consultation%20results%20and%20discussion%208_01_15.pdf).

On 21 January 2015 the Council's Cabinet approved the West End Project. The material part of its decision was as follows:

- (i) THAT the Cabinet note and have due regard to the results of the public consultation contained in the report (Appendices A, B and C);*
- (ii) THAT approval be given to proceed to detailed design and implementation of the project as described in the report, specifically agreeing those matters listed in Appendix D, subject to achieving funding from various contributing partners and compliance with statutory requirements as the project is progressed;*
- (iii) THAT as agreed by the Leader of the Council further decision making for this project be delegated to the Cabinet Member for Regeneration, Transport and Planning including but not limited to those decisions listed in Table 6.1*
- (iv) THAT authority be delegated to the Assistant Director of Environment and Transport in consultation with the Cabinet Member for Regeneration, Transport and Planning to take those decisions listed in Table 6.1 subject to any further delegation of decision making by the Cabinet Member*

The Council published the decision and the report on its website, here: <http://democracy.camden.gov.uk/ieDecisionDetails.aspx?AllId=16860>.

Para 1.1 of the report to Cabinet dated 8 January 2015 stated:

*The aim is to reduce traffic, improve road safety, make the area better for walking, cycling and people using buses and create new public spaces delivering a better area for residents, businesses and visitors.*

The material parts of Table 6.1 were (f) and (h) as follows:

- (f) 27 (Appendix D) Agree a trial to reduce through traffic on Torrington Place / Tavistock Place, including public engagement - Cabinet Member for Regeneration, Transport and Planning*

...



*(h) 6.1 (main report) Agree the detailed design and phasing of the construction - Assistant Director, Environment and Transport in consultation with Cabinet Member for Regeneration, Transport and Planning*

The detailed proposals were set out in appendix D. The headline proposal was stated at para 1.1 thereof:

*Make Tottenham Court Road two-way for buses and cyclists only (from 8am-7pm, Monday to Saturday) with local access for cars, taxis and loading on short sections of Tottenham Court Road via side roads.*

The area immediately affected by the West End Project is illustrated on the map here: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/west-end-project.en>. The eastern limit was marked by Gower Street.

However, the Cabinet also approved a trial to consider converting Torrington Place and Tavistock Place (from Gower Street to Judd Street) to one-way eastbound for motorised traffic and providing more space for cycling. This was item no. 27 in appendix D, (at [http://democracy.camden.gov.uk/documents/s39052/Item%2016%20-%20Appendix%20D%20Detailed%20proposals%20and%20amendments%208\\_01\\_15.pdf](http://democracy.camden.gov.uk/documents/s39052/Item%2016%20-%20Appendix%20D%20Detailed%20proposals%20and%20amendments%208_01_15.pdf)) as follows:

*Approve undertaking a trial to reduce through traffic on Torrington Place, including to alleviate traffic on the section west of Gower Street. Funding has been committed to undertake a feasibility study of the options to achieve this outcome. Any proposal would be subject to statutory processes. The trial would consider converting Torrington Place and Tavistock Place (from Gower Street to Judd Street) to one-way eastbound and providing more space for cycling as set out in Appendix H. A separate decision report on whether or not to go ahead with the trial including appropriate public engagement would be presented to the Cabinet Member for Regeneration, Transport and Planning.*

The reasons for the trial were explained at appendix H: see at [http://democracy.camden.gov.uk/documents/s39071/Item%2016%20-%20Appendix%20H%20Proposed%20Torrington%20Place%20trial%20scheme%208\\_01\\_15.pdf](http://democracy.camden.gov.uk/documents/s39071/Item%2016%20-%20Appendix%20H%20Proposed%20Torrington%20Place%20trial%20scheme%208_01_15.pdf). In particular, traffic modelling predicted a 102% increase in traffic on Torrington Place, representing an increase of 209 movements an hour as a result of the West End Project. The Council considered the potential impact on Torrington Place (west of Gower Street) to be severe, so that mitigation measures should be considered. It went on:

*An assessment of potential mitigation for Torrington Place has been considered and has highlighted that traffic levels on Torrington Place between Gower Street and TCR (where there is a concentration of residents) could be significantly reduced by making traffic changes to Torrington Place and Tavistock Place (east of Gower Street). Any changes to the street would also need to minimise adverse impacts on adjacent streets and take account of the importance of the street as a busy walking and cycling corridor and other requirements, e.g. local access and servicing.*

*To address concerns raised in the public consultation, it is recommended that a temporary trial of traffic changes to Torrington Place and Tavistock Place (east of Gower Street) of between six and twelve months is progressed to the public engagement stage. The trial would be subject to further design and Transport for London approval and include the following proposals:*

- *Convert the existing two-way segregated cycle track to operate as a one-way eastbound cycle lane*



- *Maintain one eastbound traffic lane*
- *Convert existing westbound traffic lane to a lane for cycling and servicing vehicles only (all other westbound traffic would not be permitted to use the street)*
- *Loading and access would be permitted in certain sections of the street and at specific times of the day.*

*If the trial showed that positive impacts outweighed any adverse impacts, the changes could be made permanent. This could also allow further improvements to Torrington Place and Tavistock Place to make the street better for residents, businesses and visitors including widening pavements.*

### **Approval of the experimental traffic scheme**

A policy decision to implement the trial for Torrington Place and Tavistock Place by experimental traffic order was made by the Cabinet Member for Regeneration, Transport and Planning on 1 July 2015.

The decision and report dated 23 June 2015 were published on the Council's website here: <http://democracy.camden.gov.uk/ieDecisionDetails.aspx?Id=1521>.

On 23 June 2015 the report was published on the Council's website. As stated in your letter dated 4 December 2015, on 1 July 2015 it was also added to the Council's Forward Plan. This was also published on the Council's website.

The decision made by the Cabinet Member on 1 July 2015 was:

*That approval was given to proceed with the implementation of the experimental traffic changes, as set out in this report, subject to detailed design and compliance with statutory processes.*

As stated in your letter dated 4 December 2015, the decision sheet provided that:

*This decision will be implemented on the expiry of five working days, unless there is a call-in of the decision to the appropriate Scrutiny Committee (for details on how to do this please contact Gianni Franchi on 020 7974 1914), in which case any such decision may not be implemented until the resolution of the call-in process. If no request for call in is received by Wednesday, 8th July 2015 then the decision will be implemented.*

The report dated 23 June 2015 stated at para 1.2:

*The trial has been proposed in order to tackle issues related to high through motor traffic, cycling and pedestrian levels on the corridor. In addition, the Council has been looking at ways to provide more space for cycling and a safer and more attractive environment for people on bikes and on foot.*

At paras 1.4 – 1.6 it stated:

*Two weeks prior to commencement of a trial, an information leaflet would be distributed to all residents, businesses, local groups and statutory groups to explain the changes and the rationale. The information leaflet would also include a contact email for people to provide comments during the trial. During the trial period and once the arrangements were well established, there would also be a formal consultation period (likely to be in early 2016). The details of public consultation would be clearly explained in the information leaflet.*

*Public consultation would seek the views of residents, local groups, institutions and statutory groups to help inform a decision on whether the changes should be made*



permanent or not. The consultation material would include survey information obtained before and during the trial as well as inviting a formal response. The Council would also undertake a representative survey to capture the views of residents, businesses, visitors, students and those using the route.

If the trial is approved and showed that positive impacts outweigh any adverse impacts, and that there was support for the changes, then the Council could consider making the traffic arrangements permanent. As part of a permanent project the Council could look to make further improvements to the corridor, including wider pavements and improved pedestrian crossings (these changes would be subject to public consultation and securing the required funding).

Detailed reasons for implementing the experimental scheme were given at paras 2 and 4, as follows:

- 2.1 *The corridor forms part of an important east / west cycle link connecting Marylebone, Fitzrovia, Bloomsbury, Kings Cross and Angel. The existing protected cycle lanes (there is a two-way cycle track on the northern side of the street) were some of the first to be installed in the UK and have helped to significantly increase cycling levels on the street. The latest surveys in 2015 recorded 1,009 cyclists during the morning peak hour and 880 in the afternoon peak hour. These figures demonstrate that the corridor is the busiest street for cycling in Camden and one of the highest in London and the UK.*
- 2.2 *Cycle demand on the corridor has now grown to a point where the existing cycle track does not provide sufficient capacity for the levels of people that wish to cycle, and during peak times there are regularly queues of cyclists that extend between junctions. In addition, the narrow cycle lanes make it difficult to safely overtake and there have been instances of collisions between cyclists trying to overtake each other. The cycle track is less than 2.5 metres wide in sections and only 1.75 metres at its narrowest point. Based on existing cycling levels, the cycle lanes would be recommended to be a minimum width of at least two metres in each direction. It is likely therefore that the existing width of the cycle track is a constraint on encouraging more people to cycle.*
- 2.3 *Torrington Place is at the heart of one of the UK's most important university and hospital campuses. It is estimated that 50,000-60,000 students are based at the University of London Bloomsbury colleges, who generate a large number of walking and cycling journeys. Due to the colleges, a large residential population, adjacent tourist attractions and a nearby employment centre, the area is extremely busy with pedestrians (over 1,800 pedestrians were counted on Torrington Place between Gower Street and Malet Street during the morning peak hour, raising to over 2,580 between 1pm and 2pm). With the planned expansion of institutions and other development in the area, the proportion of people walking and cycling will inevitably increase.*
- 2.4 *The current road layout with a two-way protected cycle track and a traffic lane in each direction does not provide a safe and attractive environment for the large number of people walking in the area. There are areas where the current pavement is very narrow and is not comfortable for the numbers of pedestrians e.g. adjacent to Tavistock Square the pavement is less than two metres wide. Because of the width of the road on the corridor it is not possible to provide more space for walking and cycling without significantly reducing the space available for motor traffic.*
- 2.5 *Unfortunately, the corridor also suffers from a poor casualty record and in the last three years to November 2014 there were 64 casualties. Around half of the collisions were between motor vehicles and cyclists, and these resulted in five serious injuries*



*and 21 slight injuries to cyclists. Nearly one-third of all cycling casualties took place at the Gordon Square (west) junction [with Torrington Place/Tavistock Place], which is one of only two locations where motor vehicles are allowed to turn across the cycle track from the main corridor.*

- 2.6 Collisions between motor vehicles and pedestrians resulted in 18 slight injuries and six serious injuries to pedestrians. Over sixty percent of the casualties involving pedestrians occurred at two junctions [with Tavistock Place]: Upper Woburn Place and Marchmont Street (the latter junction was improved in 2012 to address pedestrian and cycling casualties). The majority of pedestrian collisions are due to pedestrians stepping out into the road in front of vehicles. Site visits have highlighted that there is a lack of space on the pedestrian islands and that pedestrians frequently wait on the narrow segregation between the traffic lanes and cycle track. Residents have also raised concern that crossing the cycle track and then two traffic lanes can be difficult and confusing. Recent consultations on the West End Project and Royal College Street have also highlighted strong support for the introduction of separate protected cycle lanes on each side of the street.*
- 2.7 A number of local groups, residents and institutions have asked the Council to look at ways of reducing the impact of through traffic in the area. Consultation for the West End Project highlighted concerns from residents in Torrington Place about the potential increase in traffic in the section between Gower Street and Tottenham Court Road. As part of the approval for the West End Project, the Council agreed to bring forward proposals for a trial to reduce the impact of through traffic on local residents.*
- 2.8 Officers therefore consider it desirable to implement the experimental traffic changes to reduce through vehicular traffic on the corridor, and address current capacity and safety issues for pedestrians and cyclists. ...*

- 4.1 This option could also allow further improvements to be made at a later date for residents, businesses and visitors, if the experiment is made permanent. Further improvements could include widened pavements and improved crossings (these changes would be subject to further public consultation and be dependent on securing funding).*

*With no action, the corridor will continue to suffer from significant capacity and road safety issues that make cycling and walking unattractive and could prevent further increases in active travel. With the implementation of the West End Project, motor traffic levels are predicted to increase on Torrington Place (between Gower Street and Tottenham Court Road), which could exacerbate the existing issues on the wider corridor to an unacceptable level. As part of the Cabinet approval for the West End Project (January 21st 2015 <http://democracy.camden.gov.uk/ieDecisionDetails.aspx?AId=16860>), a separate approval was granted to progress a trial of traffic management changes to reduce the impact of through traffic on residents. Therefore taking no action on this corridor is not a viable option. Because of width constraints on the street there are no suitable options that would provide more space for cycling and walking without significantly reducing the available space for motor traffic. The existing carriageway width varies between 5.8m and 7.8m and therefore can't be narrowed without removing one of the two traffic lanes.*

- 4.2 Option 2 would not permit westbound traffic on the corridor between Gower Street and Judd Street, requiring vehicles to take alternative routes and thereby reducing traffic levels on the corridor significantly. The existing westbound traffic lane would be converted to cycling in a westbound direction and the existing protected cycle track*



would be converted for cycling in an eastbound direction. These changes would provide a safer and more attractive cycling facility with more capacity to accommodate existing and future levels. As such, the trial would improve conditions for existing cyclists, while also encouraging new cyclists. Removing westbound traffic would also make the corridor a more pleasant environment for pedestrians, with improved air quality and streets that are easier to cross.

4.3 This option could also allow further improvements to be made at a later date for residents, businesses and visitors, if the experiment is made permanent. Further improvements could include widened pavements and improved crossings (these changes would be subject to further public consultation and be dependent on securing funding).

4.4 The trial would contribute to achieving the objectives of the Camden Transport Strategy (2011), as summarised below:

*Reduce motor traffic levels and vehicle emissions to improve air quality, mitigate climate change and contribute to making Camden a 'low carbon and low waste borough' - restricting westbound traffic would significantly reduce traffic levels on the corridor, improving local air quality.*

*Encourage healthy and sustainable travel choices by prioritising walking, cycling and public transport in Camden - reallocating carriageway to cyclists would improve conditions for existing users and encourage new cyclists. Reduction of traffic on the corridor would also improve the environment for pedestrians, encouraging walking.*

*Improve road safety and personal security for people travelling in Camden - reducing traffic flows would decrease collisions between cyclists and vehicles and the two, separate cycle lanes would reduce collisions between cyclists overtaking and head-on. Conflicts between cyclists and vehicles at Gordon Square would also be reduced through introduction of a one-way system. Converting the bi-directional cycle lane to eastbound only would make the corridor less confusing for pedestrians crossing the street, minimising collisions with vehicles and cyclists.*

*Effectively manage the road network to manage congestion, improve reliability and ensure the efficient movement of goods and people - approval of the West End Project required a trial to be brought forward on Torrington Place to mitigate against greater traffic levels on the corridor in the future.*

*Develop and maintain high quality, accessible public streets and spaces and recognise that streets are about more than movement – the trial would improve the quality of the corridor for pedestrians and cyclists, and allow for further improvements if the changes are made permanent.*

*Ensure the transport system supports Camden's sustainable growth and regeneration as well as enhancing economic and community development – the changes would support an increase in pedestrians and cyclists that would result from local development and the planned expansion of institutions.*

*Ensure the transport systems supports access to local services and facilities reduces inequalities in transport and increases social inclusion – the experiment supports the most socially inclusive means of transport, as walking and cycling are the lowest cost modes. By providing more cycling capacity on the corridor, people will be better able to access services.*

The material features of the scheme were described at para 3.3B as follows:

*Between the junctions with Gower Street and Judd Street:*

- *Convert the existing westbound traffic lane to a one-way westbound cycle lane.*



- *Maintain one eastbound motor traffic lane - westbound motor traffic would not be permitted on the corridor.*
- *Convert the existing two-way protected cycle track to operate as a one-way eastbound cycle lane.*
- *No parking or loading allowed (loading would be allowed on Malet Street, Herbrand Street and Marchmont Street South).*
- *Retain the existing taxi rank outside Tavistock Hotel (taxis would only be able to access the rank in an eastbound direction).*

Para 5.5 stated:

*There is insufficient road width to provide formal loading facilities on the corridor as well as a westbound cycle lane between Upper Woburn Place and Judd Street. The section of the corridor between Gower Street and Tottenham Court Road is also narrow and if a loading bay is provided in this section there would only be space to provide a narrow 1.5 metre cycle lane, which is unlikely to be sufficient to cope with demand. To address these issues the corridor would become a no loading / parking area (taxis and other vehicles would still be allowed to pick up and drop off passengers and the taxi rank by the Tavistock hotel would be maintained). Three formal loading bays would be introduced on Huntley Street, Herbrand Street and Marchmont Street to allow businesses to continue to be serviced without impacting on traffic / cyclist movements. Relocating loading away from the corridor is likely to lead to a small increase in servicing traffic on these streets, which may be a concern to local residents.*

Para 8.1 stated:

*Consultation is not proposed prior to implementation of the experimental trial. Instead the experimental scheme would be used to inform and stimulate a consultation during its operation, once new movement patterns had established themselves. An information leaflet would be circulated to the local community prior to the trial setting out the changes and the rationale. Views of the community would be sought during the trial to help inform a decision on making the changes permanent or not.*

As was made clear in the report, the taxi rank outside the Tavistock Hotel was to be retained under the experimental scheme.

Appendix A comprised a plan of the proposed scheme. It is correct that the plan indicated that the taxi rank would remain in front of the Tavistock Hotel, but relocated on the north side of the westbound cycle lane: see at

<http://democracy.camden.gov.uk/documents/s42803/Appendix%20A%20-%20Proposed%20Design%20Option%202.pdf>.

As stated above, this was subject to detailed design and following the completion of this process this option was not taken forward to implementation.

### ***Detailed design of the scheme***

Following the decision of 1 July 2015, officers undertook detailed consideration of the design of the changes to the highway to assess their safety and suitability for all highway users including pedestrians, cyclist, taxis and taxis passengers. Two options to retain the taxi rank outside the hotel were considered:

Option 1 – That shown at appendix A to the report dated 23 June 2015.

Option 2 – Maintaining the taxi rank adjacent to the kerb with cyclists instead diverted around the taxi bay 1.5m to the north of the bay with conventional advisory cycle lane road markings.

When preparing the report dated 23 June 2015 the Assistant Director had regard to among other information the following; and officers also had regard to it when producing the detailed design:

- Waiting and loading survey (undertaken on 28 November 2013 and 3 December 2013)
- Collision data 03 November 2011 – 12 November 2014 (24 hrs) (supplied by the Metropolitan Police)
- Cycle counts 21 - 28 March 2015 (7am-7pm)
- Pedestrian counts 24 March 2015 (7am-7pm)
- Traffic data - speed and volume 11 – 17 May 2015 (24 hrs)

On 21 September 2015 the Council instructed Capital Traffic to prepare an independent road safety audit of the experimental scheme. Among other matters, they were asked to assess and compare the two options for the taxi rank described above.

The proposals for the taxi rank location were discussed with the section of TfL responsible for taxi and private hire vehicles at a site meeting on 28 September 2015. TfL did not highlight any concerns about taxi access into or out of the proposed taxi rank layout but did raise a point regarding disabled access into and out of taxis with disabled ramps. Officers discussed both rank options with TfL taxi representatives and explained that they were awaiting the outcome of the safety audit on the options before taking a decision, but their preference was to keep the rank adjacent to the kerb as this would provide better accessibility. Officers did mention to TfL that disabled passengers can also be dropped up/picked up from adjacent side streets on the hotel side

On 9 October 2015 Capital Traffic produced their report. Their assessment of the taxi rank options is detailed at section 3.2.6 of the report. Their recommendation was for option 2. This was accepted by the Council.

Following the road safety audit and the on-site discussion with TfL officers were satisfied that the current location and design of the taxi rank did not pose a significant road safety risk to taxi passengers or cyclists.

Officers had previously undertaken a detailed waiting and loading survey (undertaken on 28 November 2013 and 3 December 2013). This survey highlighted that 10 to 11 vehicles in a day, including taxis, used the taxi rank or the adjacent kerb. In light of this information, it was therefore considered that, on balance, the current location and layout of the taxi rank represented the best solution to provide improved facilities for cyclists whilst also accommodating the demand for taxis.

It was acknowledged (as is obvious) that taxis entering or exiting the rank would have to give way to westbound cyclists, however, even at peak times it was considered that there were adequate gaps in cycle flows. These are further increased by the gaps in traffic created by the traffic lights at the junction of Woburn Place with Tavistock Place. Officers were satisfied that these gaps would allow the safe passage of taxis into and out of the taxi rank without causing significant delay or inconvenience to taxi passengers.



Any taxi passengers that require a ramp for access can still safely reach the hotel with step free access. The arrangements are as follows:

- Northbound taxis – stop kerbside on the west side Woburn Place
- Southbound taxis – stop kerbside on the east side of Bedford Way

At each of the above locations the waiting restrictions do not prevent taxis or other vehicles from picking up and dropping off passengers.

A further option for the taxi rank location was considered on Woburn Place adjacent to the hotel. This option was discounted on the basis that this location would offer a lesser facility for the Tavistock Hotel and that officers were satisfied that the current arrangements provided good access to the hotel.

Officers kept an open mind throughout the development of the project to meet the project requirements as well as the Council's Transport Strategy objectives. Other options that were discounted were a full closure of the Torrington Place for example at Byng Place and converting the street to westbound vehicular traffic only (with one cycle track on the north side of the street and one cycle track on the south side of the street).

### ***Consultation***

As indicated above, TfL has been fully involved in the development of the experimental scheme. Officers held informal engagement with TfL from January 2015. On 16 July 2015 they were notified under the Traffic Management Act Notification (TMAN) and provided with details of the proposed scheme. TfL were also kept informed during the design process. Please note that the scheme is funded by TfL via the Central London Cycling Grid project. By letter dated 4 November 2015 TfL Planned Interventions approved the scheme.

On 13 October 2015 the Council's Design Engineer sent details of the proposed scheme to the Metropolitan Police. On 14 October 2015 comments were received from the Traffic Management Officer of the Roads Transport Policing Command, which were taken into account. The Council prepared a detailed drawing to deal with the points raised. On 2 November 2015 this was provided to the Metropolitan Police.

Also on 13 October 2015 the Council's Design Engineer sent details of the proposed scheme to the London Fire Brigade. On 19 October 2015 a response was received from the Watch Manager of Euston Fire Station, via the Station Manager of Kentish Town Fire Station. This was taken into account.

On 14 October 2015 the Council's Design Engineer sent details of the proposed scheme to the London Ambulance Service. No response was received.

### ***Advance publicity***

As stated above, on 1 July 2015 the decision to approve the experimental scheme was published on the Council's website and a news item concerning the decision was published on the Council's website in July.

Further information was published explaining the scheme on the Council's website on a page entitled "Torrington Place to Tavistock Place Experimental Traffic Changes". This web page can



readily be accessed via the search engine on the Council's website or indeed by Googling search terms such as "camden experimental traffic". See at: <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/torrington-place-to-tavistock-place-experimental-traffic-changes.en?page=3>.

The information available on the above web page included plain English explanations of the scheme, clear diagrams of the new road layout and a link to a detailed plan of the scheme at [http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset\\_id=3369624&](http://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3369624&).

On 23 October 2015 Council officers visited every business on Torrington Place and Tavistock Place, including the Tavistock Hotel. The purpose of these visits was to explain the changes and to discuss any potential issues with business operations, including servicing and access. Council officers discussed these matters with the hotel concierge at the Tavistock Hotel on that day.

On 26 and 27 October 2015 a detailed information leaflet was delivered via the Council's distribution company to all businesses on Torrington Place and Tavistock Place, including the Tavistock Hotel.

The information leaflet included plain English explanations of the scheme, clear diagrams of the new road layout and a detailed plan of the scheme.

The leaflet stated among other things:

*The changes are planned to be in place for 12 months and will be introduced using an experimental traffic order. During this time detailed monitoring will be undertaken. Once the trial has been in place for a few months the Council will write again to local residents and businesses to formally seek views on the changes. These views will help inform a decision on whether the changes should be made permanent. However, you do not need to wait for us to contact you – you can comment on the scheme using the email or postal address at the end of this leaflet and these comments will be given equal consideration.*

In addition, on 26 October 2015 a copy of the information leaflet was emailed to your client at [info@imperialhotels.co.uk](mailto:info@imperialhotels.co.uk), as requested by the Tavistock Hotel concierge. The email included a link to [www.camden.gov.uk/torringtontavistocktrial](http://www.camden.gov.uk/torringtontavistocktrial), a web page explaining the scheme, as follows:

*Camden Council is introducing a trial of temporary traffic changes on the east/west route that includes the streets Torrington Place, Byng Place, Gordon Square, Tavistock Square and Tavistock Place.*

*The changes are planned to be in place for 12 months and will be introduced using an experimental traffic order. During this time detailed monitoring will be undertaken. Once the trial has been in place for a few months, the Council will write to local residents and businesses to formally seek views on the changes. All views received during the trial will help inform a decision on whether the changes should be made permanent.*

*Works for the trial will take place between 6 and 23 November and will include closure of the westbound lane to traffic. During this period cyclists will be directed to move into the new cycle lane when required*

There were also clearly marked links from the above web page to the other information described above on the Council's website about the scheme. An email address for contacting the team dealing with the scheme was also provided.

Further notifications of the scheme were sent to statutory bodies and representative groups on 26 October 2015 (email), 28 October 2015 (post).

### ***The Order***

On 2 November 2015 the Order was made by the Council's Assistant Director of Environment and Transport (Sam Monck). It stated that it would come into force on 9 November 2015. Whilst it contained no separate reasons stated in the order, the Assistant Director agreed with and adopted the reasons set out in the report dated 23 June 2015, signed by him.

The Order contains the formal provisions necessary to implement the scheme. As you have stated, article 3 contained the necessary restrictions and article 4 contained provisions for suspending and modifying provisions of existing orders.

You have drawn attention to article 5, exemptions. Article 5.1 stated:

*Nothing in article 4 [sic] shall apply ...*

We would also draw attention to article 6.1, as follows:

*Pursuant to Section 10 (2) of the Act of 1984, the Director of the Culture and Environment directorate or any person authorised by her may, if it appears to her or such other authorised person essential in the interest of the expeditious, convenient and safe movement of traffic, or in the provision of suitable and adequate parking, or for preserving or improving the amenities of the area through which any road affected by this order runs, modify or suspend this order or any of the provisions in this order.*

On 3 November 2015 a copy of the draft advertisement in the Gazette and drawings of the scheme were sent by email to relevant statutory bodies, including TfL, together with a description of the general nature and effect of the Order.

On 5 November 2015 notice of making of the Order was published in the Gazette. The notice can be found here: <https://www.thegazette.co.uk/notice/2427303>. As you will be aware, the advertisement stated, among other matters:

*The experimental order will come into force on 9th November 2015 and the Council will be considering in due course whether its provisions should be continued in force indefinitely. Within a period of six months beginning with the day on which the experimental order came into force or, if this order is varied by another order or modified pursuant to section 10(2) of the 1984 Act, beginning with the day on which the variation or modification or the latest variation or modification came into force, any person may object to the making of an order for the purpose of such indefinite continuation. Any such objection must be made in writing, state the grounds on which it is made and be sent to the the Director of Culture and Environment, Transport Strategy Service, Camden Town Hall, Judd Street, London WC1H 9JE.*

### ***Implementation works***

By letter dated 4 November 2015 all local residents and businesses were informed of the works to convert the westbound traffic lane into a cycling only lane and the programme of works from 9 until 22 November 2015. The letter included a link to [www.camden.gov.uk/torringtontavistocktrial](http://www.camden.gov.uk/torringtontavistocktrial), which led to a web page explaining the scheme, with clear links to the other information described



above on the Council's website. An email address for contacting the team dealing with the scheme was also provided.

Temporary Traffic Orders TTR S14(1) and S14(2) were made in relation to resurfacing works on 18-22 and 28 November 2015.

#### ***Further publicity***

Further publicity of the Order was generated including as follows:

- Advanced information signs were erected on 5 November 2015 to advise drivers of the changes during the works and trial.
- The trial was included in the November [Camden magazine](#), which was distributed from 6 November 2015.
- A news item was issued on the Council's website on 6 November 2015 and was updated on 23 November 2015, once the changes had been implemented (<http://news.camden.gov.uk/west-ends-first-walking-and-cycling-street-to-be-trialled/>).
- The Council issued a press release on 10 November 2015, highlighting the changes that were being made and providing the webpage for further information on the changes.
- The Council has been pro-active on social media.

#### **Pre-claim correspondence**

Your letter dated 23 November 2015 contained notice of proposed proceedings and a request under the Freedom of Information Act 2000. The Council acknowledged receipt of the same and will deal with that request within the statutory time limits.

By email dated 27 November 2015 to Aidan Brookes you requested a copy of the Order by no later than 10 am on 30 November 2015. A copy of the Order was duly supplied by email timed at 4.47 the same day.

Following receipt of your letter dated 4 December 2015, a copy of the Order has been posted on the Council's website, together with other supporting information (which was already on the website), here: <http://camden.gov.uk/ccm/content/transport-and-streets/parking/traffic-order-library-folder/bus-lanes/>.

On 7 December 2015 Mr Russell was supplied with copies of the detailed plans of the scheme.

#### **Proposed grounds of review**

##### ***Alleged breaches of the 1996 Regulations***

The Council is sorry to hear about the difficulties that Mr Russell experienced when visiting the Council's reception desk on 19 and 26 November 2015.

For the reasons stated above, your client will no doubt have provided him with a description of the content of the scheme, a detailed map and a statement of the Council's reasons and statement as to whether the Council intends to consider making a permanent order having the same effect (as contained in the report dated 23 June 2015). We also note that you have made extensive reference to the content of these and other documents on the Council's website in your letter of 4 December 2015.



In view of the issues you have raised, the concerns have been noted and the Council has conducted a lessons learnt session and appropriate action has been taken.

You state that the Order does not attach a map, include a statement of reasons or include a statement as to whether the Council intends to consider making a permanent order having the same effect. These are not requirements of schedule 2 to the 1996 Regulations.

Whilst the Council very much regrets the difficulty that Mr Russell experienced in obtaining a copy of the Order from its reception, it is not accepted that these difficulties lead to the conclusion that the Order is unlawful. We note the distinction between the terms of regulation 22(2), which provided that the Order did not come into force until 12 November 2015 (7 days after the notification in the Gazette), and those of para 1 in schedule 2, which do not provide that compliance with the schedule 2 obligations is a condition of the Order coming into effect.

We have noted the typographical error in article 5.1. It is accepted that this article should refer to article 3, not article 4. This is an obvious drafting error. Steps are being taken to clarify it and we expect a suitable modification to be made pursuant to article 6.1 of the Order in due course.

You have also referred to alleged discrepancies at your para 23. Unfortunately, apart from your reference at para 27 to a suggested lack of signage you have neglected to provide any details. The Council intends to address any such discrepancies as part of the same exercise described in the preceding para. It would therefore be extremely helpful if you could specify any discrepancies about which your client is concerned.

#### ***Alleged breach of section 122 obligation***

As we understand the allegation that you are making, it is that the Council did not have regard to the desirability of securing and maintaining reasonable access to the Tavistock Hotel when making the Order. This is wholly refuted, for the reasons stated above. The Council was satisfied that under the experimental scheme there would be at least reasonable access.

We note your description of the problems experienced by taxis seeking to enter and leave the taxi rank in front of the hotel at paras 25 and 26. This description does not accord with the Council's assessment of the situation when it made the Order. Nor does the Council, as presently advised, accept that the difficulties are as great as you suggest.

The Order embodies an experimental scheme, and as stated above the Council is closely monitoring the situation, will conduct formal public consultation and has invited reasoned objections from all interested parties. The Council invites your client to engage in that process. What would be extremely helpful is if your client could record the dates, times and details of incidents such as those which you describe in general terms in your letter. Further, if your client is able to suggest a suitable time for Council officers to observe the problems, they will attend in order to monitor the situation.

We would also remind you that, if the Council is satisfied that it is essential in the interest of the expeditious, convenient and safe movement of traffic, or in the provision of suitable and adequate parking, or for preserving or improving the amenities of the area, it may modify the Order. If your client is of the view that a compelling case can be made for this to be done, we would invite your client to engage with the Council in this respect.

We do not understand the point that you are making about opening taxi doors since, under the previous road layout, a westbound taxi's offside doors would have opened onto a lane of vehicular traffic. Under the present layout, an eastbound taxi's nearside doors would open onto a cycle lane. In relation to the ordinary situation of passengers sitting in the rear of a taxi, we do not understand how the position has materially worsened. Could you please explain?

It is accepted that in certain circumstances vehicles dropping off or picking up hotel guests may have to use the alternative arrangements in Bedford Way or Woburn Place described above, however, it is not accepted that this means that, viewed overall, the access is not reasonable.

You also refer to the disruption caused by highway works. Some temporary disruption was inevitable while implementation works were carried out. This is not an ongoing feature of the scheme.

At your paras 28-31 you refer to some of the reasons given in the report of 23 June 2015 for making the Order. These need to be read in conjunction with the report of 21 January 2015 and in particular appendix H thereto. If it is being alleged that inadequate reasons have been given for introducing the scheme, this is not accepted. The junctions referred to within the relevant sections of the report are obviously junctions with "the corridor" along Torrington Place, Byng Place, Gordon Square, Tavistock Square and Tavistock Place.

Specifically in relation to casualty data, the Council commissioned a report dated August 2013 from SKM Colin Buchanan of cycling fatalities at two locations: Royal College Street and Tavistock Place/Torrington Place. Similar changes to the cycle lanes at Royal College Street approved by the Council on 25 January 2015 have led to a significant reduction in cyclist casualties.

### ***The West End Project***

We are unsure of the point you are seeking to make about the West End Project. The Council published its decision approving this substantial scheme on 21 January 2015, following and attended by significant local and national press coverage. Substantial funds have been committed to its implementation. It is far too late for your client to seek to challenge this decision.

As stated above, the detailed proposals within the West End Project were set out in appendix D to the report to Cabinet.

At para 35 you seek to misconstrue the effect of the consultation responses referred to at para 2.7 of the report dated 23 June 2015. The responses (which are summarised and set out at appendices A-C of the report dated 8 January 2015) highlighted an issue which, on investigation, indicated a significant need to reduce traffic in Tavistock Place/Torrington Place, as was set out at appendix H to the 8 January 2015 report. Further reasons for proceeding with the trial were set out in the report of 23 June 2015. The decision of 1 July 2015 also needs to be seen in the context of the Council's Transport Strategy and strategic involvement through TfL with the Mayor of London's transport policies.

The Council's decision was to introduce the scheme as an experimental order, with detailed monitoring and full public consultation to follow. There has not been a decision not to consult with your client. Nor has the Council failed to consider the issue of reasonable access to the hotel.



### *Alleged unacceptable conduct*

We do not resile from the apology set out above in relation to Mr Russell's difficulties in obtaining a copy of the Order.

However, with respect, the allegation that the Council's conduct in this case "is cause for alarm" is contrived. As you and your client will have been aware, apart from the Order itself, all relevant information was clearly displayed and readily accessible on the Council's website.

### *Delegated authority*

The Order was made by the Council's Assistant Director of Environment and Transport (Sam Monck). He is the officer who you state was authorised to make orders under the 1984 Act on behalf of the Council.

### **Response to the proposed claim**

For the reasons stated above, the Council intends to contest the proposed claim in full. Your client is invited to engage with the Council by making further, more detailed representations as part of its engagement and ahead of the formal public consultation exercise and to actively co-operate with the Council's ongoing monitoring of the effects of the experimental scheme.

### **Details of any interested parties**

As stated above, Transport for London are funding the experimental scheme. Their details are:

#### **Transport for London**

7th Floor, Windsor House  
42-50 Victoria Street  
London SW1H 0TL

### **Response to request for documents**

The following will be forwarded to you:

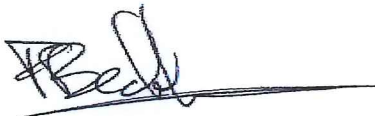
- Transport Strategy 2011-2031
- Report to Cabinet 8 January 2015
- Appendix A
- Appendix B
- Appendix C
- Appendix D
- Appendix H
- Decision of Cabinet 21 January 2015
- Report to Cabinet Member 23 June 2015
- Appendix A
- Decision of Cabinet Member 1 July 2015
- Consultation with Police, Fire and Ambulance
- TfL letter of approval 4 November 2015

- Council's website on page entitled "Torrington Place to Tavistock Place Experimental Traffic Changes"
- Leaflet delivered on 26 October 2015
- Email 26 October 2015 enclosing same
- Order 2 November 2015
- Notification of works 4 November 2015
- Notification in Gazette 5 November 2015
- SKM Colin Buchanan report August 2013
- Waiting and loading survey (undertaken on 28 November 2013 and 3 December 2013)
- Collision data 03 November 2011 – 12 November 2014 (24 hrs) (supplied by the Metropolitan Police)
- Cycle counts 21 - 28 March 2015 (7am-7pm)
- Pedestrian counts 24 March 2015 (7am-7pm)
- Traffic data - speed and volume 11 – 17 May 2015 (24 hrs)
- Capital Traffic report 9 October 2015

#### 6. Address for further correspondence and service of court documents

Legal Services  
London Borough of Camden  
Town Hall  
Judd Street  
London  
WC1H 9LP

Yours sincerely,



**Paul Beckham**  
**Civil Litigation Team**  
**For the Borough Solicitor**



Dear Sirs,

**Environmental Information Regulations ref 20386683**

Thank you for your Environmental Information Regulations request dated 23 November 2015 regarding the Camden (Prescribed Routes, Waiting and Loading Restrictions and Parking Places) (No.1) Experimental Traffic Order 2015.

Some information within the scope of your request is held. I have addressed each item of your request in turn below:

*1. A copy of the Order and the Council's Statement of Reasons*

The traffic order is enclosed with this letter. The statement of reasons is contained in the report to Cabinet Member dated 23 June 2015, which is enclosed.

*2. Copies of all consultation material including*

*(a) Any leaflets delivered to local businesses and residents confirming the method and date of delivery*

The information leaflet delivered to local residents and businesses on 26-27 October 2015 and emailed to your client is enclosed.

*(b) A list of all external bodies consulted including any operators of buses, emergency services. Please include copies of consultation material sent, and the date and method of delivery as well as any responses received.*

The following external bodies were provided with the information leaflet on (either by post or by email).

By email (sent 26th October 2015):

- Marchmont Association
- University College London
- University of London
- Birkbeck College
- London Cycling Campaign
- Camden Cycling Campaign
- Living Streets
- TfL, Freight Comms
- Fitzrovia Partnership
- Inmidtown
- Big Bus Company
- Original Bus Company

- TfL taxis
- Central London Freight Quality Partnership
- Tavistock Hotel
- LFCDA - Euston Fire Station

By post (posted on 28th October 2015):

- British Motorcyclists' Federation
- Camden Ambulance Service
- Camden Civic Society
- Camden Cycle Campaign
- Royal Mail London Central
- Confederation of Passenger Transport
- Cyclists' Touring Club Right to Ride
- Freight Transport Association, London & SE Region
- LFCDA - Kentish Town
- Licensed Taxi Drivers Association
- London Ambulance Service
- London Chamber of Commerce
- London Fire Brigade, North-West Support Area
- London Travel Watch
- Transport for London, London Buses
- Metropolitan Police Traffic Management
- Motorcycle Action Group, London Region
- Transport for London, London Routes and Places
- NSL Services (NCP)
- RNIB
- Road Haulage Association, SE Region
- TfL – Bus Priority Team
- TGWU-Woodberry
- Centre for Accessible Environments
- Station Commander, LFCDA - West Hampstead

By email (sent 29th October 2015):

- Brook House development

By email (sent 9th November 2015):

- Lever and Bloom

Transport for London (TfL) has been fully involved in the development and approval of this project. The project is funded by Transport for London via the Central London Cycling Grid and was approved via the



Traffic Management Act Notification process on 4 November 2015.  
Confirmation of the approval is enclosed.

On 13 October 2015 the Council's Design Engineer sent details of the proposed scheme to the Metropolitan Police. On 14 October 2015 comments were received from the Traffic Management Officer of the Roads Transport Policing Command, which were taken into account. The Council prepared a detailed drawing to deal with the points raised. On 2 November 2015 this was provided to the Metropolitan Police.

Also on 13 October 2015 the Council's Design Engineer sent details of the proposed scheme to the London Fire Brigade. On 19 October 2015 a response was received from the Watch Manager of Euston Fire Station, via the Station Manager of Kentish Town Fire Station. This was taken into account.

On 14 October 2015 the Council's Design Engineer sent details of the proposed scheme to the London Ambulance Service. No response was received.

The relevant emails are enclosed.

3. *Copies of all material relating to the Order including any reports to Committee/Cabinet or any other officers or members at the Council together with any responses received, all plans/drawings and internal memorandums and e-mails and any other associated papers.*

See the answer to requests 1 and 2, above. Plans were supplied to John Russell on 7 December 2015 and are also enclosed.

The scope of your request "all material relating to the Order" and "all plans/drawings and internal memorandums and emails and any other associated papers" is excessively wide and the cost of finding or copying the information would be manifestly unreasonable. Please could you assist us by narrowing the terms of your request.

4. *A copy of any survey material obtained before the Order came into force including details of what dates and at what times the surveys took place.*

The following survey data was obtained before the Order came into force, and is enclosed with this response:

- SKM Colin Buchanan report August 2013
- Waiting and loading survey (undertaken on 28 November 2013 and 3 December 2013)
- Collision data 03 November 2011 – 12 November 2014 (24 hrs) (supplied by the Metropolitan Police)

- Cycle counts 21 - 28 March 2015 (7am-7pm)
- Pedestrian counts 24 March 2015 (7am-7pm)
- Traffic data - speed and volume 11 – 17 May 2015 (24 hrs)<sup>i</sup>
- Capital Traffic report 9 October 2015

5. *Copies of all third party (including local residents and businesses) representations received in respect of the flow of traffic and/or highway safety relating to the highway and land that is the subject of the Order. This should include records kept in respect of residents concerns referred to at paragraphs 2.6 and 2.7 of the report of the Director of Culture and Environment dated 1 July 2015 (the "Report") addressed to the Cabinet Member for Regeneration, Transport and Planning, namely:- "2.6...Residents have also raised concern that crossing the cycle track and then two traffic lanes can be difficult and confusing... 2.7 A number of local groups, residents and institutions have asked the Council to look at ways of reducing the impact of through traffic in the area."*

The consultation responses referred to in the Report were responses to consultation on the West End Project. Information on the consultation and responses can be found at <https://consultations.wearecamden.org/culture-environment/wep>.

We would particularly refer you to appendix B, comments from individuals on proposals for other streets (questions 11 to 18) – page 2, comments from individuals on overall proposals and removal of one-way system (question 1) – page 12 and appendix C: comments from local groups – page 3. Appendices B and C are enclosed.

The Council may hold other information relating to representations received in respect of the flow of traffic and/or highway safety relating to the highway and land which is the subject of the Order. However, the scope of this request is excessively wide and the cost of finding or copying the information would be manifestly unreasonable. Please could you assist us by narrowing the terms of your request.

6. *Details of all other options considered by the Council other than those set out in paragraph 3 of the Report.*

Following the decision of 1 July 2015, officers undertook detailed consideration of the design of the changes to the highway to assess their safety and suitability for all highway users including pedestrians, cyclists, taxis and taxi passengers.

Officers kept an open mind throughout the development of the project to meet the project requirements as well as the Council's Transport Strategy objectives. Other options that were discounted were a full closure of the



Torrington Place for example at Byng Place and converting the street to westbound vehicular traffic only (with one cycle track on the north side of the street and one cycle track on the south side of the street).

7. *Details of the measures taken and on what date(s) to target "...publicity to advise drivers and other road users of the changes [as a result of the Order] in advance of the changes being introduced" referred to in paragraph 5.4 of the Report.*

- A news item was issued on Camden Council's website in July following the decision.
- On 22 October, 30 October and 2 November 2015 officers visited businesses along Torrington / Tavistock Place to explain the changes and address any concerns for the operation of their business.
- On 26-27 October 2015 an information leaflet was distributed to addresses in the area surrounding Torrington / Tavistock Place, and to statutory consultees and other stakeholders.
- A webpage providing details on the project, including a description of the changes, rationale for the changes, ways in which people can provide feedback and FAQs, was made live on Camden Council's website on 26<sup>th</sup> October 2015 ([www.camden.gov.uk/torringtontavistocktrial](http://www.camden.gov.uk/torringtontavistocktrial)), and has been updated throughout the trial.
- On 4 November 2015 a notification of works was distributed to relevant addresses to advise of the implementation programme. A copy of the notification is enclosed with this letter.
- Advanced information signs were erected on 5 November 2015 to advise drivers of the changes during the works and trial.
- The trial was included in the November Camden magazine, which was distributed from 6 November 2015.
- A news item was issued on Camden Council's website on 6 November 2015 and was updated on 23 November 2015, once the changes had been implemented (<http://news.camden.gov.uk/west-ends-first-walking-and-cycling-street-to-be-trialled/>).
- The council issued a press release on 10 November 2015, highlighting the changes that were being made and providing the webpage for further information on the changes.
- The Council have been pro-active on social media.

Due to the volume of data, the requested information will be sent separately by recorded delivery on an encrypted USB stick. The key to unlock the encryption is "Tavist0ck" (with a zero instead of an o).

Please note the information is still covered by copyright legislation. You are not authorised to re-use this information for commercial or research purposes as defined by the Re-Use of Public Sector Regulations 2005. If you do wish to re-use this information please contact the Information Access Team, Legal Services/ Second Floor, Camden Town Hall, Judd Street, London WC1H 9JE, who will assess your request.

If you are unhappy with any aspect of the way in that your request has been processed then you have the right to issue a complaint. If you wish to issue a complaint, please set out in writing your grounds of appeal (within 2 months of this correspondence) and send it to: the Information and Records Management Team, Camden Town Hall, Judd Street, London, WC1H 9LP and your complaint will be administered through our Internal Review procedure.

If you are still not satisfied following the Internal Review, you have a right to appeal to the Information Commissioner's Office. They can be contacted at: Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Telephone: 01625 545 700

[www.ico.gov.uk](http://www.ico.gov.uk).

Kind regards,

Rebecca Powell

Principal Transport Planner  
London Borough of Camden

Telephone: 020 7974 2309

5 Pancras Square  
London N1C 4AG

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<sup>i</sup> Please note that the May 2015 ATC data does include figures for pedal cycles; however, the counts are not accurate due to the tube specification used by the survey company. Therefore, please disregard the ATC pedal counts taken in May 2015 and refer to the cycle counts (obtained via video surveys) taken in March 2015.