

## STATEMENT OF IMPERIAL LONDON HOTELS LIMITED

**The Camden (Torrington Place to Tavistock Place) (Prescribed Routes, Waiting and Loading Restrictions and Loading Places) Traffic Order [2017]**

**Written representations of Imperial London Hotels Limited – Public Inquiry opening on 10 October 2017**

**Planning Inspectorate reference: DPI/X5210/17/8**

1. This is the written submission of the Imperial London Hotels Limited (ILHL). ILHL have instructed Farrer & Co and Mr Tim Comyn of Francis Taylor Buildings to represent ILHL's objections to the above Order at the inquiry opening on 10 October. Professional evidence relating to traffic and transport and air quality will be presented by Mr John Russell of Motion and Mr Duncan Laxen of Air Quality Consultants Limited. The purpose of this statement is to set out the company views of ILHL group which we would like the Inspector to take into account.
2. The ILHL group operates seven hotels in and around the Bloomsbury area and has been a family business in the area since 1837. The Tavistock Hotel is one of the largest hotels in the Group with 395 rooms sleeping up to 750 guests each night. The hotel was built on Tavistock Square in 1951 for the Great Exhibition and was the first hotel in London to be built after the Second World War. It has become a well-established, trusted hotel and we welcome a large number of repeat guests - many of whom will stay most weeks throughout the year. Repeat guests typically account for 25% to 30% of our guests at the Tavistock Hotel throughout the year.
3. The Tavistock Hotel has a prominent main access looking out onto Tavistock Square that has been in place since the hotel first opened, this is the only guest entrance and there is a taxi rank immediately outside. Guests have always been able to arrive and leave in any vehicle to the front of the hotel with ease. This main entrance is also the only wheelchair friendly access to the Tavistock Hotel.
4. The Tavistock Hotel operates within tight confines in the budget sector, we offer guests value for money with all-inclusive rates in the heart of the west end. As a result we monitor costs for guests very closely, mindful that even a small increase in costs could result in guests looking elsewhere. As an example we offer guests rates at £85 per night including VAT and English breakfast.
5. We also operate two staff hostels on Tavistock Place, which accommodate 41 staff members between them. The staff hostels are located at Oxford House, 30-32 Tavistock Place and at 37 Tavistock Place. All of the staff living in these hostels work at one or more of the group of seven hotels we operate. We provide all services to our staff living at the hostels including the provision of clean laundry and the collection of dirty linen, which is picked up from and delivered to the hostels. We also operate a waste collection service and other deliveries to both hostels. All of these services are now impractical to continue with the Order in place as there is nowhere for vehicles to stop outside the hostels. Appendix ILHL48 illustrates on a map the location of the Tavistock Hotel, the two staff hostels and our other hotels. It also includes photographs of the main entrance of the hotel and a photo of the cycle lane and taxi rank outside the Tavistock Hotel brought in by the Order.
6. On Monday 9 November 2015 we became aware of roadworks that were taking place immediately outside the Tavistock Hotel that were necessary to introduce the new cycle lane and to prohibit vehicular traffic travelling westbound along Tavistock

Square. Since the prohibition of traffic travelling west along Tavistock Square most of our guests have been dropped off on Bedford Way near our hotel goods yard. Guests with luggage and children have to walk (in all weather) to the entrance of the hotel on Tavistock Square.

7. On several occasions guests in wheelchairs have been dropped off on Bedford Way near our goods entrance in a taxi. This is because of the difficulty the taxi drivers sometimes experience in accessing the taxi rank immediately outside the entrance of the Tavistock Hotel on Tavistock Square. Please note that the ramps that are used by taxis to help guests in wheelchairs enter and exit the taxi, are located on the left hand side, so the ramp opens directly into the cycle lane and the oncoming cycle traffic.
8. A principal issue we have with the new traffic layout is that there is only provision for two taxis to wait outside the hotel. In practice, however, the space is not even big enough for two taxis. Cyclists do not go around the taxi bays if they are empty, this has led to a number of near misses when a taxi pulls in from the opposite direction.
9. The other problem is car doors opening onto the cycle lane which again has led to a couple of near misses. The scheme has been not well signed which has meant a number of cars still taking a left turn into Tavistock Square from Woburn Place or having to make a u-turn at the entrance of Tavistock Square. I attach appendix ILHL49, photographs of Tavistock Square taken since the experimental traffic order was introduced that illustrates some of these issues and shows cars driving past the hotel the wrong way.
10. One of the other effects of the Order has been the congestion along Woburn Place and Bedford Way which is noticeably much worse since drivers have been prevented from turning left onto Tavistock Square. Before the Trial many drivers turned left here to travel west through to Tottenham Court Road; and while this system was in operation I observed that the traffic moved easily along Tavistock Square and also along Woburn Place. Now that they are no longer able to do this drivers are proceeding north further along Woburn Place resulting in many more vehicles on Woburn Place.
11. The ILHL's health and safety manager has expressed concern about the Trial and the increased time that it will take for the emergency services to arrive at the Tavistock Hotel as a result of the worsening of traffic congestion in the area since the Order was introduced. Fire engines can only connect to water at the front of the hotel on Tavistock Square which poses a serious concern for the hotel.
12. We have experienced a number of complaints from guests and our front desk staff have been shouted at about the new system introduced by the Order and the huge disruption it has caused. One regular guest has said he will have to reconsider returning to the Tavistock Hotel because he catches the train to Kings Cross station and takes a taxi to the hotel. The last couple of times he has come to the hotel it has cost him double the amount in taxi fares. He was extremely unhappy and expressed this very clearly to the head of the hotel manager, due to the huge frustration and inconvenience to him and the extra cost. This particular guest has stayed at the Tavistock Hotel for a total of 107 nights in 2015 alone, our repeat guest are of tremendous importance to the viability of the hotel and ILHL is very concerned about the impact that the Order will have on repeat and new bookings. We regularly receive comments from our guests expressing frustration at the traffic congestion in the area since the experimental traffic order was introduced. I have set out at paragraph 2

above that the Tavistock Hotel operates in a value for money sector, so the cost associated with a guest's stay at our hotel is very important to us.

13. In addition to those complaints described in paragraph 13 above, our receptionists have also reported that our guests feel inconvenienced by the fact that taxis no longer pass the hotel. They now have to walk onto the main road to hail one. This is particularly inconvenient for those guests whose mobility may be limited and we are becoming anxious that the guests' overall comfort in the hotel has been affected by the introduction of the new system.
14. Other than the issues we have outlined above, the other impact of the proposed Order is the increase in running costs, particularly of the Tavistock Hotel. The Tavistock Hotel has a number of service vehicles arriving and departing from the Hotel on a daily basis. This is in connection with our laundry, catering and other service requirements.
15. Since the prohibition of vehicular traffic travelling westbound along Tavistock Square, our contractors have complained to us about the more onerous and longer route that vehicles are having to travel along to reach the Tavistock Hotel, as they were previously able to spend less time in what is now heavy traffic on Woburn Place, before they could reach the Tavistock Hotel. This has resulted in increased time and running costs for our contractors.
16. ILHL does not oppose the introduction of the cycle lane immediately outside the Tavistock Hotel entrance. We support the conclusion of Mr John Russell in his proof of evidence which suggests that the London Borough of Camden introduces a trial for a scheme in which vehicular traffic proceeds in a westbound only direction. There are a number of benefits, for the Tavistock Hotel in particular if a westbound only scheme was introduced.
17. The first is that access to the Hotel for taxis will be made much easier and there will be a decrease in journey times for those guests arriving by train requiring a taxi to the Tavistock Hotel. Taxis that enter and exit the taxi rank outside the Tavistock Hotel will find the process much easier, because they will be travelling in the same direction as the cyclists and not against the flow of cyclists.
18. The other notable benefit will be in respect of disabled access to the Tavistock Hotel. Prior to the introduction of the experimental traffic order it was possible for taxis to pull up alongside the kerb travelling in a westbound direction, to enable visitors with wheelchairs to leave the taxi from the front passenger side of the taxi. This is no longer possible with the introduction of the experimental traffic order and the prohibition of traffic travelling in a westbound direction. This is the only guest entrance to the Tavistock Hotel so it is of vital importance to all of our guests but particularly to our disabled guests and visitors.
19. The Tavistock Hotel does have a service entrance access from Bedford Way but it is not possible for disabled guests and visitors to be dropped off in that location and to be able to make their way safely through a busy service entrance in order to reach the Tavistock Hotel reception, where all our guests and visitors are welcomed. Clearly all of our guests arrive with luggage so it is of vital importance that they be able to access the only guest entrance on Tavistock Square.
20. We respectfully request that the Inspector takes these written representations into account as part of ILHL's case to the inquiry when making his recommendation.

Signed... *[Signature]*

Director of Imperial London Hotels Limited

Date... *22 September 2007*

Imperial London Hotels Limited