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26th March 2025

**Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London WC1H 9JE**

Our Ref: A02850-4

Dear Sir/Madam,

**Town and Country Planning Act 1990
Town and Country Planning (Control of Advertisements)
(England) Regulations 2007**

Re: The Upgrade of a Telephone Kiosk
SITE A: OS 191-199 Tottenham Court Road, W1T 7PJ
SITE B: OS 104 Southampton Row, WC1B 4BN
SITE C: Opp 35 Red Lion Square, WC1R 4SG
SITE D: OS 67 Theobalds Road, WC1X 8RX
SITE E: OS 48-56 Kingsway, WC2B 6EP

The letter supports applications for Planning Permission (PP) and Advertising Consent (AC) aimed at updating the existing telephone kiosks at the above locations. The application documents include in **Appendix A** detailed information about the replacement kiosk, along with a site location plan and images of the current site and its surroundings.

In each case the existing open kiosk structure is over ten years old and has come to the end of its effective life. These applications seek planning permission to replace the unit with a modern version, albeit keeping to essentially the same design and scale of the existing structure, but with an improved and more reliable telephone connection. The separate application is for advertisement consent to change the method of advertisement display

JCDecaux UK Limited
Registered Office: 991 Great West Road – Brentford – Middlesex – TW8 9DN
Registered in England and Wales Registration Number: 1679670
Telephone : +44 (0)20 8326 7777
www.jcdecaux.com

from the printed form to an LCD screen forming the rear elevation of the kiosk structure. The area of advertising display will remain the same as it currently exists and has existed since the first installation. The change from a printed image to an LCD screen is consistent with other roadside displays found across the Borough and Greater London and is a natural evolution of this medium and represents a more sustainable form of roadside display.

The display screen on the reverse of the unit will be used for commercial and community messaging. The space will therefore be made available to support the role of the Police and other local public agencies in crime prevention and public education to a maximum of 5% of screen time. The method of display comprises the latest high-definition LCD product whereby the luminance level automatically adjusts to ambient levels via an inbuilt light sensor and limited to a maximum of 300Cdm² at nighttime¹. The light sensor will control lighting levels automatically during the day and be able to adjust levels to reflect a change in sunrise and sunset times from summer to winter and environmental conditions. In the event of a malfunction the screen will switch off and automatically alert JCDecaux's dedicated digital team of the fault and schedule a repair. The display screen will switch off between the hours of 11:59 p.m. and 6:00 a.m.

The existing kiosk has been a feature of the respective application sites for many years and the updating of the structure will make no appreciable change to the appearance of the street or the kiosk within it. JCDecaux acts for In Focus Networks Limited, a registered code system operator and a wholly owned subsidiary of JCDecaux. As a service provider, In Focus is required to maintain a reliable and useable phone service, which will be achieved through the improved capabilities of the modern kiosk and telephony apparatus. Calls from the kiosk will continue to be free for the public to landlines, emergency and charities numbers.

The proposed advertisement would relate to existed structures, which in each case would replace one that is in situ and of a very similar character and design. That existing kiosks already include advertising, which unlike the

¹ The maximum night time limit for advertisements under 10m² in City Centres as recommended by the Institute of Lighting Professionals

current proposals use traditional printed displays. Other digital advertisements of a similar scale are, however, integrated into bus shelters, and other freestanding furniture, found elsewhere along the same streets where the kiosks are present. The existing signs that share the same street scene as the application sites are small-scale street-level items that do not unduly compete with the high-quality and imposing buildings present in their surroundings.

The proposed advertisement would present a momentary distraction from other visual attractions on the street and would not unduly compete with, detract from or obscure any of those features of the built environment. The limited size and scale of the proposal mean that the visual effects would be minimal. The lighting level of the proposed advertisements can be effectively controlled by conditions, which would ensure that it would not appear as a strident element in the street scene. This taken together with the limited hours of use and siting of the display at a lower level to the lamp standards on street would mean that it would not detract from the appearance of the streets. Overall, it is considered that the updating of the existing kiosk would not therefore be excessive or obtrusive and would not lead to a cumulative erosion of the visual amenity of the area at each site.

Discussions with the Metropolitan Police have highlighted the common challenges of anti-social behaviour in towns and cities across the UK. Issues that are specific to the misuse of telecom apparatus is of particular concern, not just in Camden, but across London and main UK Cities. As a result of our discussions with the Met Police Design Out Crime Officer (DOCO), we have adopted a Management Plan included as **Appendix B** which is intended to set out the controlling measures we will employ governing the use and functions available in the kiosks and across the entire estate. The Management Plan is designed to adapt over time to address currently unforeseen challenges. To that end JCDecaux is committed to continuing the constructive dialogue with the Met Police and to reacting to issues as and when they arise.

JCDecaux

I trust that the above and enclosed documents clearly explain the nature of the proposal but please call me if there are any further matters on which you may need clarification.

Yours sincerely,



Martin Stephens BA(Hons) Dip TP MRTPI

Director of Planning

T: 07774178640

Email: martin.stephens@jcdecaux.com

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