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Camden Council  
Planning Department

Attention of David Glasgow

By e-mail to [ppp@camden.gov.uk](mailto:ppp@camden.gov.uk) on 5th March 2015

Dear Sirs,

### **BT Telephone Boxes Change of Use to retail**

### **Application for planning permission: 2015/0979/L**

The Bloomsbury Association objects to this and similar planning applications listed below.

The proposed use of telephone boxes for retail sales would cause the pavements to be blocked by the unit, staff and customers queuing and waiting to be served. It is inevitable that public space outside the telephone box would be used for storage of goods causing further blocking of the public footway.

While Camden do not seem to have any specific policies relating to this in their Local Development Framework, the National Planning Policy Framework states in Policy 35: '*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to... create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones...*' We note the emphasis on safety and security and minimising conflicts between traffic and cyclists or pedestrians and avoiding street clutter, which is particularly important as the proposed development will not only affect the footprint of the kiosk but will also spread onto the adjacent footway as evidenced by the Council's unsightly and dangerous retail kiosks on Tottenham Court Road over which it is unable to exert any degree of control.

Furthermore, Policy 64 of the NPPF states: '*Permission should be refused for*

*development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions’.*

While recognising the applicant’s intent to help the local homeless community, the proposals are wholly inappropriate. Most red phone boxes are listed structures and turning them into essentially a fast-food stand is not in keeping with their special architectural and historic interest or with the character and appearance of the conservation area. The proposals would encourage litter, loitering and vandalism, creating a nuisance for local residents, businesses and visitors. See CMP 2.13 and 2.14.

In addition to objecting to this particular proposal, we are also opposed to the precedent that any approval would set, with the potential for these listed structures to be turned into essentially vending machines. While we recognise that these British landmarks no longer serve their original purpose, these proposals are not an appropriate use. Camden LDF Policy DP25 is reinforced by Policy 133 of the NPPF states: *‘Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...’* There are no public, only private benefits in this proposal.

BT have failed in their responsibility to maintain public telephone boxes for many years, although some efforts have been made to clean them. Policy 130 of the NPPF states: *‘Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision’.* Nevertheless, some have effectively become unlicensed advertising hoardings and we suggest that redundant and only unlisted telephone boxes that make no positive contribution to the Bloomsbury Conservation Area should be removed.

For these reasons we urge the Council not approve the application. We would be grateful if you would let us know of any further modification to the application; the decision, if it is to be decided under delegated powers, or the meeting date if it is to be decided by Committee. We would also be grateful if you would acknowledge receipt of this communication.

Yours faithfully,

Jim Murray

Chairman  
**Bloomsbury Association**

## List of applications that we oppose

### Planning applications

#### Planning applications (by ward)

Application Number: 2015/0979/L, Type: Listed Building Consent, Address: BT telephone kiosk opposite The Wiener Library  
Northwest corner of Russell Square  
London

WC1B 5DP, Ward: Bloomsbury, Proposal: Change of use of BT telephone box to self-contained retail kiosk (Class A1)

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#### Planning applications (by ward)

Application Number: 2015/0672/P, Type: Full Planning Permission, Address: BT telephone kiosk opposite The Wiener Library  
Northwest corner of Russell Square  
London

WC1B 5DP, Ward: Bloomsbury, Proposal: Change of use of BT telephone box to self-contained retail kiosk (Class A1)

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#### Planning applications (by ward)

Application Number: 2015/0984/L, Type: Listed Building Consent, Address: BT telephone kiosk outside British Museum  
Great Russell Street  
London

WC1B 3DG, Ward: Bloomsbury, Proposal: Change of use of BT telephone box to self-contained retail kiosk (Class A1)

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#### Planning applications (by ward)

Application Number: 2015/0987/P, Type: Full Planning Permission, Address: 1 x BT Telephone Kiosk  
Opposite Hotel Russell  
North side of Russell Square  
London

WC1B 5BE, Ward: Bloomsbury, Proposal: Change of use of 1 x BT telephone box to self-contained retail kiosk (Class A1)

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#### Planning applications (by ward)

Application Number: 2015/0922/L, Type: Listed Building Consent, Address: 1 x BT Telephone Kiosk  
Opposite Hotel Russell  
North side of Russell Square  
London

WC1B 5BE, Ward: Bloomsbury, Proposal: Change of use of 1 x BT telephone box to self-contained retail kiosk (Class A1)

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**Planning applications (by ward)**

Application Number: 2015/0870/P, Type: Full Planning Permission, Address: BT telephone kiosk outside British Museum

Great Russell Street

London

WC1B 3DG, Ward: Bloomsbury, Proposal: Change of use of BT telephone box to self-contained retail kiosk (Class A1)

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