

<b>Delegated Report</b>		<b>Analysis sheet</b>	<b>Expiry Date:</b>	03/10/2017
		N/A / attached	<b>Consultation Expiry Date:</b>	08/09/2017
<b>Officer</b>			<b>Application Number(s)</b>	
Charlotte Meynell			2017/3504/P	
<b>Application Address</b>			<b>Drawing Numbers</b>	
Pavement outside University College London Hospital 235 Euston Road London NW1 2BU			Refer to draft decision notice	
<b>PO 3/4</b>	<b>Area Team Signature</b>	<b>C&amp;UD</b>	<b>Authorised Officer Signature</b>	
<b>Proposal(s)</b>				
Installation of 1 x telephone kiosk on the pavement.				
<b>Recommendation(s):</b>		Prior Approval Required – Approval Refused		
<b>Application Type:</b>		GPDO Prior Approval Determination		

<b>Conditions or Reasons for Refusal:</b>	<b>Refer to Draft Decision Notice</b>					
<b>Informatives:</b>						
<b>Consultations</b>						
<b>Adjoining Occupiers:</b>	No. notified	<b>00</b>	No. of responses	<b>00</b>	No. of objections	<b>00</b>
<b>Summary of consultation responses:</b>	<p><u>A site notice was displayed on 18/08/2017 and expired on 08/09/2017.</u></p> <p>In response to the proposal, an objection was received from Flat 18 Russell Square Mansions, 122 Southampton Row.</p> <p>Objections were made on the following grounds:</p> <ul style="list-style-type: none"> <li>• I believe that [this application] serves no good for the public and will be a danger to the public as it will obstruct the pavement. It will also provide a location for litter to accumulate and be a hiding place for illicit activity.</li> <li>• I may be cynical but it seems that the sole purpose of this is for the applicant to obtain an advertising location. It provides no public benefit and decreases public safety.</li> </ul> <p>Metropolitan Police – Designing Out Crime Officer objects on the following grounds:</p> <ul style="list-style-type: none"> <li>• Research on the crime rate sourced from police.uk has highlighted that the area is experiencing an increased number of ASB (anti-social behaviour), burglary, motor vehicle crime and violent incidents [comparison of crimes in the area between June 2016 and May 2017]. Specifically my research has highlighted that crime is occurring directly in the immediate vicinity of the proposed development. The vast majority of incidents show ASB as the highest offence, often this is a pre-cursor to violence, theft and drug related crimes. As such, serious consideration must be given to crime and ASB at the proposed development site.</li> <li>• I believe this type of telephone kiosk design will provide a possible obstruction to the local CCTV in Euston Road and to the highway. It will also effect the natural surveillance of the entire area, blocking the view of pedestrians walking either east or west along Euston Road.</li> <li>• The local area is well known for drugs misuse and anti-social behaviour, a fixed and covered location will give the opportunity for people to loiter and will encourage the above behaviour. Especially if the outside of the kiosk is covered in advertising concealing the interior from outside view. This is a particular concern due to the close proximity of the main entrance to the UCH.</li> <li>• Due to the location of the telephone kiosk, it will attract the placement of prostitute cards which is unsightly and offensive to pedestrians walking past. This makes the area appear to be rundown and encourages more anti-social behaviour.</li> </ul> <p>TfL objects on the following grounds:</p> <ul style="list-style-type: none"> <li>• The site is on the TLRN for which TfL is the highway authority and as such we are concerned about any proposal which could impact on the safety and capacity of the public carriageway and/or footway. TfL is</li> </ul>					

also responsible for planning and securing the operation of bus services in the capital and most other public transport. In addition it plans and operates the cycle hire scheme and Cycle Superhighways, Quietways and other cycle routes. We are concerned about impacts on these transport services and infrastructure.

- The submission is lacking in detail such that it is difficult to assess the acceptability of the kiosks in terms of siting and appearance. There is no photo montage with the site marked out nor are there drawings showing the kiosks in the context of the footway and carriageway and existing trees, street furniture, signs and so forth. Furthermore, there is no indication as to the orientation of the kiosk.
- TfL would expect the siting of any kiosk to comply with our Streetscape design guidelines. The covering letter submitted suggests this is the case and there is at least 3.3m clear footway width (excluding any private forecourt) and there is a minimum of 0.45m set back from the carriageway. However it is not possible to check this and nor is it clear whether any account is taken of trees, street furniture etc. On this basis TfL would object to prior approval being given on the grounds of failure to demonstrate that the siting meets safety and comfort guidance.
- TfL reminds the applicant and Council that the London Plan favours decluttering and simplifying the streetscape wherever possible (see policy 6.10) and this is also prioritised in TfL Streetscape Guidance (available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>). In addition we note that all the kiosks are proposed for locations in which there are already a number of existing phone kiosks in close proximity. There has been no evidence submitted as to the need for further provision of phone kiosks over and above those which exist already. We therefore also object to the principle of siting new phone kiosks in these parts of Camden.

Transport Strategy object as follows:

- One of Camden's core objectives is to promote sustainable transport by means of walking and cycling. Installing a telephone box at this location would reduce the available footway and result in pedestrian comfort levels being below an acceptable level and could in turn lead to the discouragement of travel by sustainable means.
- As an absolute minimum guide to footway width, Camden refers to Appendix B in TfL's Pedestrian Comfort Guidance which notes that active and high flow locations must provide a minimum 2.2m and 3.3m of 'clear footway width' (respectively) for the safe and comfortable movement of pedestrians. As such, the above proposal is not in line with the guidelines set out in TfL's Pedestrian Comfort Guidance.
- Development wishing to alter the existing layout of the public highway must design for Camden's road hierarchy giving pedestrians and cyclists priority above all other users. Any introduction of unnecessary street furniture and thus the removal of a permeable pedestrian environment, is seen to have a detrimental effect on pedestrian movement, specifically for vulnerable road users. Interrupting continuous stretches of public footways and increasing pedestrian journey time is unacceptable. With respect to the above points the proposed telephone kiosk has been deemed contrary to paragraph 10.10 of Camden's Planning Guidance (CPG7).
- The proposal is intended to be located next to an existing bus stop and in close proximity of a bus shelter. The proposal could be a visual

	<p>and physical obstruction to bus patrons, preventing them from boarding or disembarking safely and visually obstructing passengers and negatively impacting their ability to signal the bus. As such the proposal is contrary to Policy A1 paragraph 6.10.</p> <ul style="list-style-type: none"> <li>• The application is contrary to policy T1 (Prioritising walking, cycling and public transport) and Camden's Streetscape Design Manual. The application is therefore deemed unacceptable.</li> </ul> <p>The Council's Access Officer objects as follows:  There are a number of requirements for an accessible phone booth that need to be considered. These are all taken from BS8300 (current addition).</p> <ul style="list-style-type: none"> <li>• A fold down seat (450mm to 520mm high) or a perch seat (650mm to 800mm high) should be provided for convenience of ambulant disabled people. Drop down arms should be provided for each seat.</li> <li>• Telephone controls on accessible telephones for wheelchair users should be angled so they can be used by people when seated or when using a perch seat.</li> <li>• Telephone controls should be located between 750mm and 1000mm above the floor.</li> <li>• To benefit blind and partially sighted people, telephones should be selected which have well lit keypads, large embossed or raised numerals that contrasts visually with their background and a raised dot on the number '5'.</li> <li>• Instructions for using telephones should be clear. They should be displayed in large easy-to-read typeface.</li> </ul> <p>There should also be at least 1200mm, preferably 1800mm between the booth and any wall / guiding opposite.</p>
<p><b>Councillor Harrison comments:</b></p>	<p>Councillor Harrison has objected on the following grounds:</p> <ul style="list-style-type: none"> <li>• Added street clutter and obstruction, unsightliness, hotspot for crime and inaccessible to wheelchair users.</li> </ul>

## Site Description

The application site comprises of an area of the footway adjacent to University College London Hospital on the south-eastern side of Euston Road. The site is directly adjacent to the entrance steps to University College Hospital. Several street lamps are located in close proximity of the site and a bus shelter is situated 29m to the south-west. A bus stop runs alongside the northern side of the site.

The site lies within the Central London Area and is part of Transport for London's (TfL's) Road Network (TLRN). The site is not located within a conservation area and is not adjacent to any listed buildings.

## Relevant History

### Site history:

None

### Neighbouring sites:

#### **Pavement outside 215 Euston Road**

**2017/3450/P** – Installation of 1 x telephone kiosk on the pavement. **Prior Approval under consideration**

#### **Bus-Stop Outside 215 Euston Road**

**2017/0282/A** – Display of 2x internally illuminated digital screens to bus shelter no. CAM00119AB.

**Advertisement consent granted 07/03/2017**

#### **Pavement outside 250 Euston Road**

**2017/3505/P** – Installation of 1 x telephone kiosk on the pavement. **Prior Approval refused 07/08/2017**

**2014/4607/P** – Installation of a public payphone on pavement. **Prior Approval refused 22/01/2015**

#### **Land adjacent to 250 Euston Road and corner with Hampstead Road**

**2017/1774/A** – Installation of digital advertisement screen (Dimensions: 6m height x 4m width x 0.5m depth) and associated stand (Dimensions: 9.5m height x 1.3m width x 0.9m depth). **Advertisement consent under consideration**

#### **Pavement outside 286 Euston Road**

**2017/2494/P** – Installation of telephone kiosk on the pavement. **Prior Approval refused 21/06/2017**

#### **Pavement outside Euston Tower on western side of Hampstead Road**

**2017/3527/P** – Installation of 1 x telephone kiosk on the pavement. **Prior Approval refused 07/08/2017**

**2017/3542/P** – Installation of 1 x telephone kiosk on the pavement. **Prior Approval refused 07/08/2017**

#### **Pavement outside University College London Hospital on Tottenham Court Road Opposite Warren Street Underground Station**

**2017/3548/P** – Installation of 1 x telephone kiosk on the pavement. **Prior Approval refused 07/08/2017**

#### **Land adjacent to Warren Street Underground Station, Euston Road**

**2017/1081/P** – Installation of 1 x telephone box on the pavement. **Prior Approval refused 07/04/2017**

**2017/1086/P** – Installation of 1 x telephone box on the pavement. **Prior Approval refused 06/04/2017**

## Relevant policies

### National Planning Policy Framework (2012)

### London Plan 2016

### TfL's Pedestrian Comfort Guidance for London (2010)

### Camden Local Plan 2017

A1 Managing the impact of development

C5 Safety and Security

C6 Access

D1 Design

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

### Camden Planning Guidance

CPG1 Design (2015)

CPG7 Transport (2011)

Camden Streetscape Design Manual

## Assessment

### 1.0 Proposal

1.1 Confirmation is sought as to whether the installation of a telephone kiosk would require prior approval under Part 24 of Schedule 2 of the GPDO. The order permits the Council to only consider matters of siting and appearance in determining GPDO prior approval applications. The potential impact on crime and public safety are relevant considerations under siting.

1.2 The kiosk would measure 1.32m by 1.11m with an overall height of 2.45m, and would be located on the south-eastern pedestrian footway along Euston Road, adjacent to University College Hospital at No. 235 Euston Road.

1.3 It would have a powder coated metal frame with reinforced laminated glass on three sides, and a solar panel on the roof.

### 2.0 Assessment

2.1 Policy A1 states that the Council will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities, and that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. Paragraph 6.10 states that the Council will expect works affecting the highway network to consider highway safety, with a focus on vulnerable road users, including the provision of adequate sightlines for vehicles, and that development should address the needs of vulnerable or disabled users. Furthermore, Policy T1 point e) states that the Council will seek to ensure that developments provide high quality footpaths and pavements that are wide enough for the number of people expected to use them, including features to assist vulnerable road users where appropriate, and paragraph 8.9 of CPG7 (Transport) highlights that footways should be wide enough for two people using wheelchairs, or prams, to pass each other.

2.2 Camden's Streetscape Design manual – section 3.01 footway width states the following:

- "Clear footway" is not the distance from kerb to boundary wall, but the unobstructed pathway width within the footway;
- 1.8 metres – minimum width needed for two adults passing;
- 3 metres – minimum width for busy pedestrian street though greater widths are usually

required;

- Keeping the footway width visually free of street furniture is also important, allowing clear sightlines along the street'.

2.3 All development affecting footways in Camden is also expected to comply with Appendix B of Transport for London's (TfL's) Pedestrian Comfort Guidance, which notes that active and high flow locations must provide a minimum 2.2m and 3.3m of 'clear footway width' (respectively) for the safe and comfortable movement of pedestrians.

2.4 Policy T1 states that the Council will promote sustainable transport choices by prioritising walking, cycling and public transport use and that development should ensure that sustainable transport will be the primary means of travel to and from the site. Policy T1 points a) and b) state that in order to promote walking in the borough and improve the pedestrian environment, the Council will seek to ensure that developments improve the pedestrian environment by supporting high quality improvement works, and make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping.

2.5 Policy T1 (Public Transport) states that where appropriate, development will be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

2.6 Paragraph 8.6 of CPG7 (Transport) seeks improvements to streets and spaces to ensure good quality access and circulation arrangements for all. Ensuring the following:

- Safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments and other disabilities;
- Maximising pedestrian accessibility and minimising journey times;
- Providing stretches of continuous public footways without public highway crossings;
- Linking to, maintaining, extending and improving the network pedestrian pathways;
- Providing a high quality environment in terms of appearance, design and construction, paying attention to Conservation Areas;
- Use of paving surfaces which enhance ease of movement for vulnerable road users; and,
- Avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed e.g. by pavement parking or by street furniture.

2.7 Policy C5 requires development to contribute to community safety and security, and paragraph 4.89 of Policy C5 states that the design of streets needs to be accessible, safe and uncluttered, with careful consideration given to the design and location of any street furniture or equipment. Paragraphs 9.26 and 9.27 of CPG1 (Design) advise that the proposed placement of a new phone kiosk needs to be considered to ensure that it has a limited impact on the sightlines of the footway, and that the size of the kiosk should be minimised to limit its impact on the streetscene and to decrease opportunities for crime and anti-social behaviour.

### **3.0 Siting**

3.1 The application site is located on a pavement measuring roughly 4.6m wide. This area of the footway experiences extremely high pedestrian flows, particularly at peak times.

3.2 Section 3.01 of Camden's Streetscape Design Manual requires a minimum unobstructed pathway width within the footway, known as the 'clear footway'. This guidance and Appendix B of TfL's Pedestrian Comfort Guidance, outlines the recommended minimum footway widths for different levels of pedestrian flows.

3.3 The footprint of the proposed telephone kiosk measures 1.32m by 1.11m. Detailed design drawings that include the orientation and exact proposed positioning of the new telephone kiosk on the pavement have not been submitted and so it is unclear as to how wide the 'clear footway' width would be once the proposed telephone kiosk has been installed. However, Camden's Streetscape

Design Manual section 4.01, together with TfL's Pedestrian Comfort Guidance, states that street furniture should be placed a minimum of 0.45m back from the carriageway, therefore the proposal would result in the loss of a minimum of 1.8m of the footway. This would reduce the 'clear footway' to less than the minimum threshold, which would reduce pedestrian comfort, resulting in overcrowding, issues highway safety through interfering with signals, visual obstructions, visibility splays and may lead to the discouragement of sustainable travel. As such, the proposal would be contrary to Policies A1 and T1 and is considered unacceptable.

3.4 There are nine existing telephone kiosks within approximately 183m of the site. These include three existing kiosks located approximately 50m north-east of the site and one further telephone kiosk approximately 64m to the north-east of the site on the northern side of Euston Road; two existing telephone kiosks 170m to the south-east of the site along Gower Street; and three further telephone kiosks including one wheelchair accessible kiosk, approximately 183m to the south-west on the southern side of Euston Road. No justification has been submitted for the need to install a further one. In addition to concerns about the infrequent use of telephone kiosks due to the prevalence of mobile phone use, it is considered that the proposed telephone kiosk would act only as a hindrance to pedestrian movement, adding further clutter to the streetscene rather than providing a public service for the benefit of highways users, contrary to Policy A1.

#### **4.0 Design and Appearance**

4.1 Policy D1 aims to ensure the highest design standards for developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, its contribution to the public realm, and its impact on wider views and vistas.

4.2 The street furniture that presently exists on this section of the footway comprises necessary elements of street lamps and a bus shelter. It is considered that the introduction of a new telephone kiosk to this relatively clear section of footway would severely degrade the visual amenity of the area through the creation of unnecessary street clutter. Furthermore, due to its proposed location within 183m of nine existing telephone kiosks, it is considered that the proposed development would add to the over-proliferation of such structures and severely degrade the visual amenity of the area through the creation of further unnecessary street clutter.

4.3 The proposed structure is considered to be a very poor design in terms of size, scale, massing and proposed materials, and is not an appropriate or acceptable addition in this location. It would be an obtrusive piece of street furniture in this location detracting from the streetscene. The powder coated metal frame and reinforced laminated glass incongruous design would provide an intrusive addition to the street. As such, the proposal would fail to adhere to Policy D1.

#### Access

4.4 Policy C6 requires new buildings, spaces and facilities that the public may use to be fully accessible to promote equality of opportunity. Although the proposed kiosk would allow for wheelchair users to 'access' the kiosk, this does not amount to the provision of a wheelchair accessible phone. The Council's Access Officer has highlighted that there are a number of requirements which need to be considered for an accessible phone booth, including the height of the telephone controls, which should be located between 0.75m and 1.0m above the floor. The telephone controls in the proposed kiosk would be located at a height of 1.5m above the floor, and so the proposed kiosk is considered unacceptable in terms of providing access for all, contrary to Policy C6.

#### **5.0 Anti-social behaviour**

5.1 With regards to community safety matters, a number of issues have been raised by the Metropolitan Police Crime Prevention Design Advisor. In particular it has been noted that the area is currently experiencing an increase in crime and anti-social behaviour, and the design and siting



of the proposal on a busy footway would further add to street clutter and safety issues in terms of crime and anti-social behaviour, through reducing sight lines and natural surveillance in the area, and providing a potential opportunity for an offender to loiter. The proposal would therefore be contrary to Policy C5 and CPG1 (Design).

## **6.0 Conclusion**

6.1 The proposal would result in unacceptable street clutter, harmful to the character and appearance of the streetscape and to the detriment of pedestrian flows, as well as creating issues with safety and poor accessibility. The proposal, by virtue of its siting and appearance, is considered unacceptable.

## **7.0 Recommendation**

7.1 Refuse Prior Approval