



Date: 16/09/2016
Our ref: 2016/3367/PRE
Contact: Ian Gracie
Direct line: 020 7974 2507
Email: ian.gracie@camden.gov.uk

Planning Solutions Team
Planning and Regeneration
 Culture & Environment
 Directorate
 London Borough of Camden
 2nd Floor
 5 Pancras Square
 London
 N1C 4AG

Alistair Cox

Clear Channel
 33 Golden Square
 London
 W1F 9JT

www.camden.gov.uk/planning

Dear Mr Cox

Re: Replacement of phone kiosks at 35 locations around the borough comprising a digital advertising screen on one elevation

Thank you for submitting a pre-planning application enquiry which was received on 15 June 2016 together with the required fee of £2,960.

The applicant wishes to receive the Council's view on whether the proposed re-design of phone kiosks at 35 locations around the borough comprising a digital advertising screen on one elevation could be considered acceptable. In particular, advice is sought with regards to design and the impacts in terms of conservation, amenity and transport.

1. Drawings and documents

1.1 The following documentation was submitted in support of the pre-application request:

- 'New world payphones' specification document;
- Site list;
- OS map and photo of each site

2. Proposal

2.1 Proposed re-design of existing phone kiosks at 35 locations around the borough comprising a digital advertising screen on one elevation. It is noted that the proposed phone box is approximately 1150mm wide whilst the existing phone box is approximately 900mm wide.

2.2 The applicant also proposes to remove phone boxes in 35 other locations around the borough.

3. Site description

3.1 The proposal comprises a number of sites. A full description and analysis of each site can be found within section 6 and appendix 1 of this letter.

4. Relevant planning history

4.1 There is no relevant planning history associated with these sites in Camden.

5. Relevant legislation, policies and guidance

- 5.1 The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8th November 2010, The London Plan (2016) and the NPPF (2012).
- 5.2 The proposal would be assessed against local policies CS5 (Managing the impact of growth and development) and CS14 (Promoting high quality places and conserving our heritage) of the Core Strategy (adopted November 2010).
- 5.3 The proposal would also be assessed against policies DP24 (Securing high quality design) and DP25 (Conserving Camden's heritage) of the Development Policies (November 2010).
- 5.4 The following Camden Planning Guidance documents also provide relevant guidance for this proposal:
- CPG1 – Design;

6. Assessment

- 6.1 The main issues to consider in this case are as follows:
- Design;
 - Heritage;
 - Amenity; and
 - Transport.

Design

- 6.2 In terms of utility and design officers are strongly of the view that this proposal would not improve the existing situation. Rather, the proposal may actually cause genuine harm to the character of Camden's built environment.
- 6.3 The K6 and British Telecom K phone boxes are icons of design. The original was designed by one of the greatest architects of its day. The original kiosks are true icons of their time by virtue of being both meticulously well designed functional structures and beautiful according to many aesthetic measures – the iconic roof of the 1924 K2 and the more common 1935 K6 is based on the Soane family tomb. This roof is geometrically rigorous, symmetrical and is based on a square footprint. The proposed kiosk only loosely echoes that shape but its proportions are not true to it and it is based on a rectangle giving it a compressed and asymmetrical appearance. The proposed kiosk's proportions are also wider and shorter than those of the K6 (which is itself shorter than the K2) – proportions that seem determined by the advertising screen. There are already many kiosks which are based on the iconic K2 phone box, which adds up to a glut of poor imitations on our streets, of which this will become another. Poor pastiche (a design which is only loosely based on a historic precedent) and partial imitation are universally considered to be an inferior design solution to one which is contemporary. So as a building on the street, the proposal represents poor design with compromised and unreliable utility benefits and potentially harmful advertising additions.
- 6.4 Because of the poor design quality, this kiosk would be unsuitable for conservation areas and prominent locations where only high quality design would be accepted. It may also be unacceptable in many other locations where design is still a consideration. This would undermine the applicants desire to unify their estate and roll out the kiosk across London.

The same issues with design will be a concern throughout London and elsewhere. Again, this will limit the potential roll-out of this kiosk.

- 6.5 The other offer of the new booth is advertisement or guest login supported WI-FI (not directly provided by Clear Channel). Many existing kiosks offer WI-FI as do various other sources across the borough. Where free (advertisement supported or guest sign-in WI-FI) is already present, this kiosk would not offer any additional utility benefits. Coupled with the kiosk's poor physical design and additional LED screen advert, it represents at most harm and at least no additional benefits.
- 6.6 The proposal comes with a guarantee of maintenance and a promise of a tree for every existing phone box removed. It also offers a more physically accessible kiosk. The applicant is encouraged to liaise with Camden's and TfL's street tree maintenance teams to discuss the possibility of ongoing maintenance of the newly proposed trees. For the occasional mobility impaired user who does not have access to a mobile phone, this new kiosk may represent an improvement.

Design Conclusion

- 6.7 The existing Clear Channel phone kiosks offer the preferred static, unlit type of advertisement space. These existing phone boxes are of various designs but are in most cases simple, authentic and contemporary and have neither a positive or negative impact on the street scene except where they are poorly maintained or proliferate cumulatively with other 'street clutter'. The proposal adds an additional illuminated advert onto the street scene. It also adds another element of visual clutter by introducing yet another pastiche of the classic phone box. Officers would argue that the existing neutral impact is preferable to the negative impact that will be caused by the proposed kiosks.

Design Recommendation

- 6.8 Officers would recommend the applicant involve a skilled and experienced Architect. They could be set a brief for a simple, contemporary phone kiosk which represents the best of contemporary British design and workmanship; which is instantly recognisable as a phone box; which provides shelter; which introduces unobtrusive advertising; which does not add to visual street clutter; which is robust and easy to mass produce; which will be designed so as to fit into even the most sensitive of locations. The right design would be more welcome in Camden and could in theory bring a contemporary classic design to streets across the country. If the right design was found, it would also mean that the kiosk would be more welcome in sensitive locations across the country.
- 6.9 In conclusion I would recommend that this particular kiosk is not recommended for approval in Camden.
- 6.10 Whilst the design of the phone box is considered unacceptable, it is important to note that the proposed increase in width, presumably to allow for more advertising space, is not supported by officers. Anything which proposes to increase the width and ultimately the size of the obstruction to pedestrian flows would also not be supported.
- 6.11 It is however noted that the proposed removal of phone boxes at 35 other sites across the borough is welcome. The reduction in the amount of street clutter in these areas is considered to be an enhancement to the streetscape.

Heritage & Amenity

6.12 **Appendix 1** contains a table which sets out the constraints of each individual site in terms of whether it is within a conservation area, adjacent to a listed building, within a residential area, or within a commercial area. This is not to conclude on whether or not a site is acceptable, but it does provide a helpful guide to the applicant so that when or if an application is submitted, they are mindful of the particular constraints of each site which will ultimately help to inform the assessment. It is worth noting, however, that until the Council is in receipt of an acceptable design, officers are unable to provide further comments on the suitability of each individual site as yet.

6.13 It is worth noting here that, whilst the summaries of each site may suggest that advertising has the possibility of being acceptable in a certain location (subject to addressing the constraints on site), officers do not consider the design of the proposal to be acceptable.

o/s 184 Tottenham Court Road

6.14 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

Adjacent to 1 Eversholt Street

6.15 Whilst this site is adjacent to a listed building (Royal George public house), it is also within a very commercial area with very little, if any, neighbouring residential premises. Again, whilst the principle of roadside advertising may be considered acceptable, the applicant will however be required to demonstrate that the proposal does not affect the safety of road users and that the proposal is acceptable in design terms.

6.16 Great care will need to be taken to ensure that the setting of the listed building is not undermined as a result of advertising in this location.

o/s 2 Harben Parade

6.17 This site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area which is characteristic of this part of Finchley Road. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms. See the section above for the Council's view on the design merits of the proposal.

o/s 20 Northways Parade

6.18 The context of this site is very similar to that of the 'o/s 2 Harben Parade' site. Please refer to paragraph 6.13 above.

Opp Chalk Farm Station

6.19 This site has a couple of constraints that the applicant must be particularly mindful of when assessing whether digital advertising in this site would be appropriate here. The site is directly opposite the Grade II listed underground station. Further to this, a large residential development is located to the south. Any application of this site will need to be mindful of the setting of the heritage asset whilst also being mindful of the amenities of this residential

location. It will be important to demonstrate that adverse impacts to this residential area are kept to a minimum.

o/s 124 Robert St

- 6.20 The sensitivities with this site are associated with its largely residential character. Any application of this site will need to be mindful of its residential setting and the amenities of the surrounding residential occupiers. It will be important to demonstrate that adverse impacts to this residential area are kept to a minimum.
- 6.21 What's more, this site is located at a traffic intersection. It will be particularly important therefore to demonstrate that the safety of road users is not compromised by the distraction of advertising in this location.

o/s 104 Tottenham Court Rd

- 6.22 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

Opp 152 Euston Road

- 6.23 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable.
- 6.24 This site is located at one of the borough's busiest traffic intersections. As such, it will be very important in this case to demonstrate that the proposal will not have a detrimental impact on the safety of road users.

o/s 38 Tottenham Court Rd

- 6.25 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 23 Tottenham Court Rd

- 6.26 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 295 Euston Road

- 6.27 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does

not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

- 6.28 This site is located at one of the borough's busiest traffic intersections. As such, it will be very important in this case to demonstrate that the proposal will not have a detrimental impact on the safety of road users.

o/s 144-146 Camden High St

- 6.29 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 154 Kilburn High Rd

- 6.30 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

o/s 179 Haverstock Hill

- 6.31 This site is located within the Belsize Park conservation area and is one of the borough's most historic town centres. It is not considered a suitable site for freestanding digital advertising. The applicant would not be encouraged to submit such an application for this site.

o/s 197 Kentish Town Rd

- 6.32 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

o/s 24-32 Kilburn High Rd

- 6.33 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

o/s 35 Hampstead High St

- 6.34 This site is located within the Hampstead conservation area and is highly sensitive in terms of its special character and surrounding listed buildings due to the site being within one of the borough's most historic and important town centres. It is not considered a suitable site for freestanding digital advertising. The applicant would not be encouraged to submit such an application for this site.

o/s 366 Grays Inn Rd

- 6.35 This site is immediately adjacent to a Grade II listed building. Whilst this site is commercial in nature, the sensitivities of the listed building are of paramount importance. Further to this, the applicant will however be required to demonstrate that the proposal does not affect the safety of road users.

o/s 40 Bernard St

- 6.36 This site is surrounded by listed buildings and is therefore particularly sensitive. The site is particularly commercial in nature owing to it being located adjacent to the Russell Square tube station. Despite its commercial nature the site

o/s 40 New Oxford St

- 6.37 This site is within the Bloomsbury conservation area and is opposite a Grade II listed building. It is however noted that the site is in a particularly commercial area. It is noted that whilst the land use of the surrounding area is such that advertising in this area may be suitable, it will be important to demonstrate that the site's surrounding heritage assets will not be affected by such a proposal.

o/s 55 New Oxford St

- 6.38 This site is within the Bloomsbury conservation area and is opposite a Grade II listed building. It is however noted that the site is in a particularly commercial area. It is noted that whilst the land use of the surrounding area is such that advertising in this area may be suitable, it will be important to demonstrate that the site's surrounding heritage assets will not be affected by such a proposal.

o/s 147 Holborn

- 6.39 This site is particularly commercial in nature however the applicant must be mindful of the sensitivities of the surrounding area. The site is within a conservation area and adjacent to two Grade II* buildings. This is a particularly busy traffic junction so it will be important to demonstrate that the safety of road users will not be affected as a result of the proposal.

o/s 106 Kilburn High Rd

- 6.40 This particular site is not in a conservation area, adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in design terms.

o/s 200-208 Tottenham Court Rd

- 6.41 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the

character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 114-115 Tottenham Court Rd

- 6.42 This site is within the Fitzroy Square conservation area and it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 245 Tottenham Court Rd

- 6.43 Whilst this site is not located within a conservation area, it is located along one of the borough's key retail frontages. As such, it will be important to demonstrate that the character of this area is not undermined. Much like the other sites, and in particular with this site being a key vehicular thoroughfare, it will be important to demonstrate that the proposal will not create a safety risk to drivers and pedestrians alike.

o/s 111 High Holborn

- 6.44 Whilst the site is within a conservation area, it is not adjacent to a listed building, or within a residential area. Further to this, the site is within a largely commercial area which is characteristic of this part of High Holborn. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. This is a particularly busy traffic junction so it will be important to demonstrate that the safety of road users will not be affected as a result of the proposal. The applicant will also be required to demonstrate that the proposal is acceptable in design terms. See the section above for the Council's view on the design merits of the proposal.

o/s 121-123 Kingsway

- 6.45 This site is particularly commercial in nature however the applicant must be mindful of the sensitivities of the surrounding area. The site is within a conservation area and adjacent to both a Grade II and Grade II* building. This is a particularly busy traffic junction so it will be important to demonstrate that the safety of road users will not be affected as a result of the proposal.

o/s 240 Kilburn High Rd

- 6.46 This particular site is not in a conservation area, but it is adjacent to a Grade II listed building. Further to this, the site is within a largely commercial area. With this in mind, this is the type of site where the principle of roadside advertising may be considered acceptable. The applicant will however be required to demonstrate that the proposal does not affect the safety of road users and demonstrate that the proposal is acceptable in terms of its impact on the surrounding heritage asset.

o/s 100 Southampton Row

- 6.47 This site is not within a conservation area but it is opposite a number of Grade II listed buildings. The site is however opposite the boundary to the Bloomsbury conservation area. It will therefore be important to demonstrate the proposal will preserve the character of the Bloomsbury conservation area. With that in mind it will also be important to demonstrate that the safety of road users will not be compromised as a result of the proposal.

Southampton Row

- 6.48 Whilst this site is within a commercial area, it is surrounded by a mixture of Grade II* and Grade II listed buildings. This site is also a particularly busy traffic junction where a great deal of concentration is required. It is considered unlikely that this site will be considered acceptable in transport terms alone.

7. Conclusions

- 7.1 The conclusions to design and each particular site are set out as above.
- 7.2 Whilst it may be considered that advertising in certain locations could be acceptable, the introduction of digital advertising draws a more complex assessment due to the higher levels of illumination and visual impact to the street scene. As such, with any application submission, a strong level of justification will need to be provided in each case, to demonstrate that the visual impact of the proposal is kept to a minimum to the surrounding areas.
- 7.3 It is important to note, in the first instance, that the proposed design and increase in the size of the phone box is not considered acceptable from both a design and pedestrian obstruction point of view.

8. Planning application information

- 8.1 The information that would be required for this application is set out below.
- 8.2 If you submit a planning application which addresses the outstanding design and clutter issue detailed in this report satisfactorily, I would advise you to submit the following for a valid planning application:
- Completed and signed planning application forms for Full Planning Permission;
 - An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red for each site;
 - Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed' which also show the context of the surroundings;
 - Supporting Planning Statement which assesses the proposals against relevant planning policy;
 - Photograph of each site;
 - The appropriate fee – £195;
 - Please see [supporting information for planning applications](#) for more information.
- 8.3 We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on each of the proposed sites. The Council must allow 21 days from the consultation start date for responses to be received.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Ian Gracie (0207 974 2507)

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Ian Gracie
Planning Officer
Planning Solutions Team

Appendix 1

Site address	Conservation Area?	Adjacent to LB	Residential Area?	Commercial Area?
o/s 184 Tottenham Court Rd	N	N	N	Y
Adj 1 Eversholt Street	Y	Y	N	Y
o/s 2 Harben Parade	N	N	N	Y
o/s 20 Northways Parade	N	N	N	Y
Opp Chalk Farm Station	N	Y	Y	N
o/s 124 Robert St	N	N	Y	N
o/s 104 Tottenham Court Rd	N	N	N	Y
Opp 152 Euston Road	N	N	N	Y
o/s 38 Tottenham Court Rd	Y	Y	N	Y
o/s 23 Tottenham Court Rd	N	N	N	Y
o/s 295 Euston Road	N	N	N	Y
o/s 144-146 Camden High St	Y	N	N	Y
o/s 154 Kilburn High Rd	N	N	N	N
o/s 179 Haverstock Hill	Y	Y	N	N
o/s 197 Kentish Town Rd	Y	N	N	N
o/s 24-32 Kilburn High Rd	N	N	N	N
o/s 35 Hampstead High St	Y	Y	N	Y
o/s 366 Grays Inn Rd	Y	Y	N	Y
o/s 40 Bernard St	Y	Y	N	N
o/s 40 New Oxford St	Y	Y	N	Y
o/s 55 New Oxford St	Y	Y	N	Y
o/s 147 Holborn	Y	Y	N	Y
o/s 106 Kilburn High Rd	N	N	N	Y
o/s 200-208 Tottenham Court Rd	Y	Y	N	Y
o/s 114-115 Tottenham Court Rd	Y	N	N	Y
o/s 245 Tottenham Court Rd	N	N	N	Y
o/s 111 High Holborn	Y	Y	N	Y
o/s 121-123 Kingsway	Y	Y	N	Y
o/s 240 Kilburn High Rd	N	Y	N	N
o/s 100 Southampton Row	Y	Y	N	Y
Southampton Row	Y	Y	N	N