



LAND ADJACENT TO WARREN STREET UNDERGROUND STATION
LONDON NW1 3AA

PROPOSAL: Installation of 1 telephone kiosk on the pavement
Application for planning permission: 2018/0309/P

3 March 2018

The Bloomsbury Association objects to this application and wishes to make the following comments.

1. The application is one of several that are identical. It is also identical to a preceding application to which the Association objected in July 2017 and was subsequently refused planning permission for reasons we endorse. We note that an uncompromising letter accompanies each application, that no pre-application discussions have taken place with Council officers and that no Design & Access Statement or context assessment accompanies the applications.
2. No consideration is given to the impact of the appearance of the kiosks from the neighbouring conservation areas of Fitzroy Square, Bloomsbury and Hanway Street when it is clear from plan and elevation that the back and side of the kiosk (of unspecified materials) may be intended to include full-height advertising of an unspecified nature. The rear external face of the kiosk is hinged to allow access for advertisement display although we would expect a digital display to be more likely.
3. We note that no application for advertisement consent accompanies the applications although the kiosk is clearly designed to facilitate this.
4. The Fitzrovia Area Action Plan highlights the severe deficiency in public space provision in the area. Of the existing public open space, 80% is on streets and footpaths. This is complemented by new and improved open spaces at St Giles Circus, in Windmill Square, Whitfield Gardens and Tottenham Court Walk and it is an inappropriate balance of priority that this space should be cluttered by privately owned kiosks, serving a commercial purpose. Open space is a civic amenity to be enjoyed by all.
5. On Tottenham Court Road there are 35 existing telephone kiosks. All are unused, unmaintained, covered in graffiti and advertisements for prostitutes; larger kiosks are used by rough sleepers and those with doors by users of crack cocaine. All make an unsightly contribution to the street scene and encourage crime and anti-social behaviour; some are also used as urinals and present a health hazard. There is no need for more of the same. We note that these are not applications to replace existing kiosks but to add more. No management or maintenance plan accompanies the applications.
6. Tottenham Court Road is excessively cluttered with street furniture and is subject to major public realm renewal as part of the Council's West End Project, which was approved by Camden Council Cabinet on 21 January 2015. The application does not acknowledge this and we see no information submitted to explain how these proposals will be integrated into the Council's highway, urban realm and landscape proposals for the West End Project. Construction work has now commenced to implement the West End Project and any proposal such as this should be a part of and coordinated with the Project's overall public realm strategy and not something that is counter to its objectives, the first of which to be implemented is decluttering the area.
7. Tottenham Court Road is visually congested and has been declared the worst street in London. A video was prepared for Council Members by the local community in 2010: '*Tottenham Court*

Road: Great Street or Great Embarrassment?' We submit this in support of our comments. It is available at this link: <http://www.youtube.com/watch?v=DesqbmDcyZ4>

8. The pavement space outside UCLH and adjacent to Warren Street, Goodge Street and Tottenham Court Road Underground stations all has high footfall and is particularly congested and cluttered. When Crossrail I and II, and HS2 become operational, there is expected to be a huge increase in pedestrian footfall on Tottenham Court Road. We have previously expressed concern to the Council that not enough has been done to deal with removal of existing street/pavement clutter, including the various unsightly, ad hoc structures that occupy the public realm. These proposals will add more clutter, further obstruct pedestrian flow and add to what is already an appalling environment for pedestrians and a serious safety hazard.

The Association supports good quality design that will enhance Bloomsbury's streetscape, which this proposal clearly does not. With such a demonstrable disregard of the West End Project, a breach of the Council's planning policy and of its supplementary planning guidance, we look to the Council to refuse this and similar applications.

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.

Stephen Heath
On behalf of The Bloomsbury Association

Copies to:
Councillor Adam Harrison, London Borough of Camden
Charlotte Meynell, London Borough of Camden
Tony Young, London Borough of Camden
Kevin Stears, London Borough of Camden
Fitzrovia Neighbourhood Association
Chair, Bloomsbury Association