

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2018/0873/P	Meredith Whitten on behalf of the Covent Garden Community Association	Covent Garden Community Association 42 Earlham Street WC2H 9LA	17/03/2018 02:52:41	OBJ	<p>The CGCA objects to the installation of a replacement telephone kiosk at this location adjacent to three conservation areas (Seven Dials (Covent Garden), Denmark Street and Bloomsbury). There is no planning justification for maintaining a phone kiosk that is not used, not cleaned and not maintained.</p> <p>(1) The proposed telephone kiosk fails to preserve or enhance the historic nature and unique character of the conservation areas (Local Plan D1 &amp; D2). Para 7.46 of the Local Plan (see D2) specifies that the Council “will only grant planning permission for development in Camden’s conservation areas that preserves and enhances the special character or appearance of the area.” Also see CPG1 2.6 and CPG1 2.9.</p> <p>(2) The proposed telephone kiosk would result in visual street clutter that detracts from the character of the conservation areas and that goes against Camden’s aim of reducing visual street clutter (see Streetscape Design Manual, Chapter 4). Such street clutter has a significantly adverse effect on the appearance of the streetscape and the amenity of the area. Local Plan policy C5 also specifies that the design of streets, public areas, and the spaces between buildings needs to be uncluttered.</p> <p>(3) The negative impact of this visual clutter is exacerbated by the lack of cleaning and maintenance of the kiosk. This includes the proliferation of “prostitute cards,” as the Metropolitan Police Service describes these inappropriate advertisements. There is no mention of a cleaning or maintenance schedule in the applicant’s proposals.</p> <p>(4) The proposed telephone kiosk would further contribute to visual clutter as its primary function would be to serve as an advertising presence. Indeed, the location is a high-traffic pedestrian and vehicle area. CPG1 para 8.9 says advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance.</p> <p>(5) Further, the proposed telephone kiosk presents a safety hazard, as it obstructs the flow of pedestrian traffic, as well as wheelchairs and prams, at this location, which experiences high footfall.</p> <p>(6) Finally, as the Metropolitan Police have noted – and to which local residents can attest – phone boxes and kiosks are heavily used for crime and antisocial behaviour. As police constable and Design Out Crime Officer Jim Cope says, phone boxes in Camden are “crime generators” (see Met Police comments). Phone boxes and kiosks conceal criminal behaviour, including drug activity.</p> <p>Research and data contradict the need for the number of public phone boxes and kiosks. According to Ofcom, for example, the money that BT received from phone boxes went down by nearly half between 2000 and 2006. Further, Ofcom’s 2016 Communications Market Report found that 93 percent of UK adults own or use a mobile phone in the UK; 71 percent of adults own a smartphone. Research in 2013 also found that only 3 percent of UK residents made a call from a public phone box in the previous month.</p> <p>Whilst the CGCA acknowledges the applicant proposes to reduce the overall number of phone kiosks they own, the evidence strongly supports that the number of public telephone boxes and kiosks should be more drastically reduced.</p> <p>Should the Council be minded to grant permission, conditions should be included that require a detailed maintenance and management plan, which the Metropolitan Police also recommend. This plan should include details for weekly cleanings and removal of</p>

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inappropriate advertising.  
The CGCA requests to be informed of any appeals made by the applicant.

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