



Dear Camden Planning,

*The following comments represent the views of Transport for London officers and are made on a “without prejudice” basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.*

Thanks for consulting TfL Spatial Planning on:

- ∞ **Application Number**  
2018/0854/P
- ∞ **Site Address**  
Telephone Kiosk outside 2 Harben Parade Finchley Road London NW3 6JP
- ∞ **Proposal**  
Erection of freestanding telephone kiosk providing phone and Wi-Fi facilities, location based information, payment facilities with 1 x LCD illuminated digital advertisement following the removal of 3 x telephone kiosks.

TfL has the following comments:

- ∞ The site of the proposed development is on Finchley Road A41, which forms part of the Transport for London Road Network. TfL is therefore the highway authority under the Traffic Management Act 2004. Section 31 of the Act specifically states that the term “traffic” includes pedestrians. So the duty requires TfL to consider the movement of all road users: pedestrians and cyclists, as well as motorised vehicles – whether engaged in the transport of people or goods.
- ∞ TfL understands from statements in the application materials that this proposal for a new phone box is part of a deal between the Council and New World to renew the phone box estate across the borough. It is therefore contingent on removal of more than 1 phone box in exchange for the new unit proposed, leading to an overall reduction in phone boxes in the public realm across Camden.
- ∞ TfL reminds the applicant and Council that the current London Plan Policy 6.10 (Walking) refers to **‘promoting simplified streetscape, decluttering and access for all’** and also states that Planning Decisions **‘should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space’**.
- ∞ Decluttering the streetscape is also prioritised in TfL Streetscape Guidance (available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>). TfL expects the standards and principles in this document to be applied to all phone box replacement applications by the council.

Part E, page 241 of the guidance is about phone boxes and states: ‘New open-sided units, such as the ST6, are now in use and include a 1.36-metre wide illuminated advert on one side. ST6 units should be fitted so that the advertisement faces the flow of traffic. A footway width of minimum 4,200mm is required but designers should also consider pedestrian flows to determine appropriate placement. They are not appropriate for conservation areas and require planning consent for illuminated advertisements.’

The unit proposed in this application is similar to the ST6 discussed in the current TfL Streetscape guidance. However, crucially the advertising proposed would be digital.

- ∞ At this location, TfL Spatial Planning therefore requests completion of an Advertising Safety Guidance Form (ASGF, see pages 17-23 of the attached guidance document) by the applicant prior to determination of the application by the Council. The results of the ASGF need to be assessed by TfL's Road Safety team.

In conclusion **TfL Spatial Planning currently objects to the application due to highway safety concerns.** Due to the potential for driver distraction caused by the new Digital Advertisement facing traffic and the heavy traffic flows in the area, TfL Spatial Planning requests completion of an ASGF for further assessment. The Council should not consent the proposal until further discussions and assessment have taken place.

Thanks and kind regards,



For more information regarding the TfL Spatial Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit:  
<https://www.tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guidance>