

<b>Refusal Report</b>		<b>Analysis sheet</b>		<b>Expiry Date:</b>	02/10/2018
		N/A / attached		<b>Consultation Expiry Date:</b>	10/09/2018
<b>Officer</b>			<b>Application Number(s)</b>		
Tony Young			2018/3828/P		
<b>Application Address</b>			<b>Drawing Numbers</b>		
Pavement outside 27-28 Chalk Farm Road London NW1 8AG			Refer to 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 pavement.					
<b>Recommendation(s):</b>		Prior Approval Required - Approval Refused			
<b>Application Type:</b>		GPDO Prior Approval Determination			



Conditions or Reasons for Refusal:	Refer to Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	2	No. of responses	0	No. of objections	0
Summary of consultation responses:	<u>A site notice was displayed on 17/08/2018 and expired on 10/09/2018.</u>					
	<p>In response to the proposal, the following responses were received</p> <p><b>Transport Strategy objects as follows:</b></p> <p>The proposal is very similar to a previous application from the same developer which was refused (planning reference 2018/0342/P). In addition, we are currently going through the appeal process for a separate telephone kiosk application from a different developer at the same site (planning reference 2017/5427/P). We therefore recommend refusal on the following grounds:</p> <ul style="list-style-type: none"><li>• The site is located in one of our town centres near Camden Town and Chalk Farm underground stations on one of the busiest pedestrian corridors in the borough. Pedestrian volumes are extremely high and are forecast to increase significantly when Crossrail services become operational later this year along with ongoing economic growth in the borough. Existing footway space is a scarce resource and must be safeguarded for pedestrians both now and in the future to accommodate economic growth.</li><li>• The telephone kiosk would be located adjacent to the kerb on a section of footway with very little in the way of street furniture, with the exception of 2 slender lamp columns. There is a redundant bus shelter located nearby. However, this is to be removed via a public realm scheme currently being developed for the Chalk Farm Road corridor. The telephone kiosk would be significantly wider than other items of street furniture such as lamp columns in the general vicinity of the site. The streetscape is characterised by the presence of various small and semi-mature trees adjacent to the kerb. The proposal to install a telephone kiosk would therefore have a harmful and negative impact on the streetscape.</li><li>• The telephone kiosk would obstruct and impede pedestrian movement (especially for blind and partially sighted pedestrians) and visibility on and along the footway. This would have a significant impact on pedestrian comfort levels, both now and in the future. It would obstruct inter-visibility between vehicular traffic and pedestrians wishing to cross the road at the traffic signal controlled junction nearby. The proposal therefore constitutes a hazard to public safety.</li><li>• The telephone kiosk would be significantly wider than other items of street furniture including existing telephone kiosks in the general vicinity of the site. The proposal would therefore have a harmful and negative impact on the streetscape.</li><li>• The telephone kiosk would obstruct and impede kerbside activity such as deliveries, taxi pick-ups and drop-offs, refuse and recycling</li></ul>					



collections, and other servicing.

- The telephone kiosk would obstruct visibility splays between Chalk Farm Road and Hartland Road. This would constitute a hazard and could lead to dangerous situations and collisions at the junction of Chalk Farm Road and Hartland Road. Cyclists and pedestrians would be at particular risk and the proposal is therefore unacceptable.
- I am also aware that the Metropolitan Police have raised concerns about this type of application. The telephone kiosk would facilitate crime and anti-social behaviour and would constitute a hazard to public safety. It would also obstruct CCTV visibility.

**Metropolitan Police – Designing Out Crime Officer objects on the following grounds:**

- Telephone kiosks are no longer used for their original purpose due to the fact that nearly every person is in possession of some kind of mobile device thus negating the need to use fixed land line telephone. As a result of this the phone boxes in The London Borough of Camden have now become 'crime generators' and a focal point for anti-social behaviour (ASB).
- My own previous experience of policing Camden highlights the above ASB, ranging from witnessing the taking of Class A drugs, urination, littering, the placing of 'Prostitute Cards', graffiti, sexual activities and a fixed location for begging. All of which have occurred within the current telephone kiosks. Also, due to poor maintenance any that are damaged or are dirty do not get cleaned, which makes the telephone kiosk unusable and an eye sore. Following the 'Broken Window' theory, if a location looks and feels that it is uncared for and in a state of disrepair then this leads to other criminal activity occurring within that location.
- The proposed location of the device is directly opposite the main entrance to The Stables Market which is an extremely busy location due to it being a well-known tourist attraction which is visited by thousands of people throughout the day. Due to this location also having a number of bars, restaurants and clubs it is in use up until 0100 hours. Due to the number of people dispersing this location it is imperative that they have a free and unimpeded route away from the area. When crowds stop or are prevented from moving freely then public order situations can occur. So any extra street furniture within the area would just add to this issue. Even though it is proposed to be opposite the exit the site is between a busy road junction which is used by taxis for pickups and also a 24hr bus stop. Therefore most people leaving The Stables Market will cross the road at this point to reach these. The additional street furniture will block vision for drivers at the junction and also for bus drivers approaching the stop which will increase the risk for a potential collision with a pedestrian.
- The design of the unit itself appears to be an issue as the operating unit, chargers and handset are situated on one side. Therefore if a person is using the unit they cannot see what is going on around them nor who could be approaching them from further up the foot path. Therefore creating a fear of crime whilst being used.



- The hand set unit appears to be recessed into the main unit and therefore appears from the picture graphic to create a flat surface. The Stables Market and the surrounding area is well known for Class A Drugs Misuse and therefore any well-lit and smooth surface is used for the preparation of such narcotics. This recess could also be used to store small objects and conceal them if police approach a suspect drug misuser preventing them from detecting crime.
- The introduction of the unit will also increase the above ASB, as it conceals the activities of what is occurring behind the actual space and prevents police or passers-by seeing what or who is in/near there. This generates for the latter a fear of crime especially in regards to begging. As they will use the phone box as a cover and as a back rest when they sit on the floor, when the footpath is reduced in width even more by their presence pedestrians have to walk past closely and therefore this generates an uncomfortable feeling for them.
- The extra lighting produced by the kiosk and the space it uses up in the public realm will also create an added distraction to an already cluttered street space. Any CCTV monitoring the area will be effected by this and therefore any crime prevention/detection properties they produce is lost.
- Recent media reports have highlighted the increase in planning applications submitted to local planners for the construction of telephone kiosks. These were proven to have very little or no benefit to the local community especially in regards to the facilities that they are alleged to supply. The main reason busy locations with a high pedestrian and vehicle activity is chosen so that the telephone kiosk can be used as advertising space.

**Transport for London (TfL) Spatial Planning objects as follows:**

TfL objects to this application on strategic transport grounds and it should be refused.

- The local streetscape is due to be upgraded significantly as part of a Section 278 agreement between the Council and Morrisons/Barratt London related to planning permission 2017/3847/P.
- I would also suggest the introducing additional clutter to the streetscape in the form of a phone kiosk would contradict the aims of the Council's own adopted Camden Goods Yard planning framework, specifically the place based guidance for Chalk Farm Road which says "Development must radically enhance this important part of Camden Town Centre and create an inviting gateway to the framework area...improving the environment for pedestrians and cyclists and creating a welcoming visual connection to and from the high street to encourage footfall."
- The proposed phone kiosk would not meet the policy requirements of the locally adopted planning framework.

In addition I cite the following points and policies in support of my objection to the application:



- Similar units installed in London elsewhere function mainly as advertising, not communications infrastructure. Phone box usage is extremely rare in London today due to the popularity of mobile phones. Inclusion of phone kiosks such as the one proposed within the definition of 'communications infrastructure' should be reviewed by central government.
- 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'. TfL Spatial Planning takes the view that the phone box proposed would not contribute in any way to a high quality pedestrian environment or emphasise the quality of 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. The application does not specify the footway width at the application site. Please note that even if the footway is over 4.2m wide, my other objections would still apply.

- We remind the Council that the draft new London Plan was launched for consultation on 1st December 2017. This document is now a material consideration in determining applications and in assessing general conformity of emerging local policy. As such, TfL now has regard to this Plan, inter alia, when assessing and responding to relevant consultations.

Policy D7 (Public realm), part I, states: 'Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.'

The street furniture proposed would be unnecessary due to the widespread popularity of mobile phones. It is also likely to be dysfunctional as a telephone kiosk due to extremely low usage.

Policy T2 (Healthy Streets), part D, states: 'Development proposals



should: 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.'

This development proposal would not deliver any improvements that support any of the ten Healthy Streets Indicators.

- The site of the proposed development is on the Borough highway and Camden Council is the highway authority. Section 31 of the Traffic Management Act specifically states that the term "traffic" includes pedestrians. So the duty requires the Council 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.

Unnecessary and dysfunctional street clutter at any location in the footway on the highway has an obvious adverse impact on the movement of pedestrians, which goes against the Council's statutory network management duties.



## Site Description

The application site comprises of an area of the footway adjacent to Nos. 27-28 Chalk Farm Road on the northern side of Chalk Farm Road. The site is situated between two street trees and is within close proximity of a street lamp and signage and a disused bus shelter to the east and one Camden cycle parking stand to the north-west on the northern side of Chalk Farm Road. The site is directly opposite the entrance to the Stables Market.

Although the site does not fall within a conservation area, it is located opposite the Regents Canal Conservation Area; the Stables Market, which is a Grade II\* listed building; and Stanley Sidings, which is a Grade II listed building.

## Relevant History

### Site history:

2018/0342/P - Installation of 1 x telephone kiosk on pavement - Prior Approval refused 15/03/2018

2017/5427/P - Installation of 1 x telephone kiosk on the pavement - Prior Approval refused 21/11/2017

2017/1079/P - Installation of 1 x telephone box on the pavement.- Prior Approval refused 06/04/2017

2012/5945/P - Installation of 1x solar powered telephone kiosk on the pavement.- Prior Approval refused 20/12/2012

### **Neighbouring sites:**

Pavement outside 31 Chalk Farm Road

2017/5425/P – Installation of 1 x telephone box on the pavement. Prior Approval refused 22/11/2017

Bus shelter outside Stables Market (opposite 23 Chalk Farm Road)

2016/4467/A – Installation of double-sided structure to existing bus shelter no. 0107/1074 to display 2x internally illuminated digital screens. Advertisement consent refused 24/01/2017. Appeal dismissed 24/04/2017

O/S 10 Chalk Farm Road

2015/2856/P - Replacement of existing public telephone kiosk with combine public telephone and Automated Teller Machine (ATM) kiosk. Planning permission refused 09/12/2015

O/S 45-46 Chalk Farm Road

2015/2853/P - Replacement of existing public telephone kiosk with combine public telephone and Automated Teller Machine (ATM) kiosk.- Refused 09/12/2015

44-45 Chalk Farm Road

2005/0605/P – Installation of a dual-purpose ATM/telephone kiosk. Planning permission refused 13/04/2005

## Relevant policies

### **National Planning Policy Framework 2018**

### **London Plan 2016**

### **Draft New London Plan 2017**

### **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  
D2 Heritage  
G1 Delivery and location of growth  
T1 Prioritising walking, cycling and public transport

### **Camden Planning Guidance**

CPG1 (Design) March 2018

CPG7 (Transport) 2011

### **Camden Streetscape Design Manual**

**Design of an accessible and inclusive built environment. External environment - code of practice** (BS8300-1:2018 and BS-2:2018)

**Regents Canal Conservation Area Appraisal and Management Strategy (adopted September 2008)**

**Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013**

## **Assessment**

### **1. Proposal**

- 1.1 Confirmation is sought as to whether the installation of a telephone kiosk would require prior approval under Part 16 of Schedule 2 of the GPDO. The order permits the Council to only consider matters of siting, design and appearance in determining GPDO prior approval applications. The potential impact on crime and public safety are relevant considerations under siting, design, appearance and access.
- 1.2 The proposal is for installation of a solar powered 'totem' telephone kiosk. The kiosk would measure 1.32m in width by 0.88m in depth with an overall height of 3.12m including its solar panel canopy (2.8m high for the main body and 0.22m in depth without the solar panel canopy) and would be located on the pedestrian footway along Chalk Farm Road, adjacent to 27-28 Chalk Farm Road.
- 1.3 The rear elevation would have phone facilities (handset and keypad) on a metal backing and frame with a rear solar panel; the front elevation would have a visual area be used entirely for a LED digital advertising display screen with 4 LED strips running the full height of the kiosk totem. A solar panel canopy would be located on top of the unit.

### **2. Assessment**

- 2.1 Policy A1 (Managing the impact of development) 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 (Prioritising walking, cycling and public transport) 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;
- 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 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 (Safety and Security) 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. Siting**

3.1 The application site is located on a section of pavement and footway on Chalk Farm Road which is situated between Hawley Street and Hartland Road. The site sits within one of Camden's Town Centres near Camden Town and Chalk Farm underground stations on one of the busiest pedestrian corridors in the borough. Pedestrian volumes are extremely high and are forecast to increase significantly when Crossrail services become operational later this year



along with ongoing economic growth in the borough. There is already existing street furniture in close proximity in the form of a redundant bus shelter located in the middle of the pavement, lampposts, CCTV mast, bicycle stand and car parking meter positioned in various locations across the pavement. The streetscape is also characterised by the presence of various small and semi-mature trees adjacent to the kerb. As part of a public realm scheme currently being developed for the Chalk Farm Road corridor, the redundant bus shelter would be removed.

- 3.2 The proposal to install a telephone kiosk would therefore have a harmful and negative impact on the streetscape by not only introducing additional street clutter, but also through the addition of a further obstruction and impediment to pedestrian movement (especially for blind and partially sighted pedestrians) and to visibility on and along the footway. This would have a significant impact on pedestrian comfort levels, both now and in the future. It would also obstruct inter-visibility between vehicular traffic and pedestrians wishing to cross the road at the traffic signal controlled junction nearby. The proposal therefore constitutes a hazard to public safety.
- 3.3 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. Section 4.01, together with TfL's Pedestrian Comfort Guidance, states that street furniture should be placed a minimum of 0.45m (0.5m preferred) back from the carriageway,
- 3.4 The footprint of the proposed telephone kiosk measures 1.32m wide by 0.22m deep. The dimensions provided on the site location and block plans show the footway to be 8.8m wide at this point with an effective footway width of 7.2m between the telephone kiosk and the adjacent building. However, this fails to note that there is a strip of private forecourt at the front of this terrace of properties that is approximately 1m wide which is mainly used to site tables and chairs for customers at nearby cafes and restaurants. As such, the true effective footway width for pedestrian movement (taking into account the minimum setback required of 0.45m from the carriageway) is estimated to be approximately 6m.
- 3.5 Therefore, the proposal would result in the loss of a minimum of approximately 2.8m of the footway, so significantly reducing the 'clear footway' in this part of Chalk Farm Road which has an existing redundant bus shelter and lamppost immediately next to the proposed kiosk location that already reduces the 'clear footway' below recommended levels in this section of pavement. The kiosk's siting would therefore present a serious concern in an area which is already restricted and that experiences heavy, regular footfall given its proximity to The Stables Market especially at weekends, but also during the evenings and early hours of the morning. Given that greater pathway widths are usually required in high pedestrian flow areas like this location, it is considered that pedestrian comfort would be inappropriately reduced by the proposal, resulting in an increased potential for impaired movement and overcrowding, as well as, the associated adverse highway safety implications. This impact is likely to have a more significant detrimental impact on the disabled and elderly and their use of the highway, given the more restricted width. Both disability and age are protected characteristics under the Public Sector Equality Duty, and they will suffer more harm than groups who do not share those characteristics. As such, the proposal would be contrary to policies A1 and T1 and is considered unacceptable.
- 3.6 The applicant states there is a need for children to have access to public telephone kiosks in order to make free calls to Childline. There are 3 existing telephone kiosks within approximately 119m of the site. These include 2 existing kiosks located approximately 110m south-east of the site and 1 further telephone kiosk approximately 119m north-west of the site on the northern side of Chalk Farm Road. As such, the applicant's reasoning is not considered to be sufficient justification for the installation of a further telephone kiosk. 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 unnecessary and dysfunctional street clutter to the streetscene rather than providing a



public service for the benefit of highways users, contrary to policy A1.

#### **4. Design and Appearance**

- 4.1 Policy D1 (Design) 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. Policy D2 (Heritage) states that the Council will not permit development outside of a conservation area that causes harm to the character and appearance of that conservation area, and that to preserve and enhance the borough's listed buildings, the Council will only grant permission for development that it considers would not harm the setting of a listed building.
- 4.2 The Regents Canal Conservation Area Appraisal and Management Strategy advises that *'it is important that the need to preserve or enhance the historic character of the conservation area is recognised in the design and siting of all street furniture.... The Council will make efforts to avoid any unnecessary visual clutter.'*
- 4.3 The application site is situated near a current public realms improvement secured by Section 106 agreement granted in 23/01/2013 for the redevelopment of Hawley Wharf (2012/4640/P). The Section 106 includes a contribution of £90,000, some of which will be used for the redevelopment of the surrounding streetscene. As such, there are concerted efforts to create a high quality space free from unnecessary street clutter and to improve pedestrian comfort, especially with regards to the safety of vulnerable road users through providing additional space for walking and cycling. The installation of a new telephone kiosk in this location would add further street clutter to the streetscene contrary to the the aims of this and other committed street improvement schemes. The proposal is therefore considered to be unacceptable.
- 4.4 The proposed structure is considered to be a poor design in terms of its size, position, and materials, and as such, is not considered to be an appropriate or acceptable addition in this location. The kiosk would also include an illuminated digital advertising display screen with 4 LED strips running the full height of the kiosk totem. While it is accepted that all advertisements are intended to attract attention, the introduction of an illuminated advertisement panel in this particular location is considered to be inappropriate as it would introduce a visually obtrusive piece of street furniture detracting from the streetscene. This is particularly the case given the kiosk's proposed location within the setting of the adjacent Grade II\* listed Stables Market, Grade II listed Stanley Sidings and Regents Canal Conservation Area, and would thus result in a significant harm within this setting and wider streetscene. As such the proposal would fail to adhere to policies D1 and D2.
- 4.5 The National Planning Policy Framework (The Framework) says that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance. In this case there would be harm but it is considered that this would be less than substantial harm. Under these circumstances, the harm should be weighed against the public benefits of the proposals. As there are already a number of existing telephone kiosks within close proximity of the site and given the prevalence of mobile phone use, there is not considered to be any public benefit or need that justifies the provision of another kiosk in this location to the public benefit.
- 4.6 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent adjacent Grade II\* listed Stables Market, Grade II listed Stanley Sidings and Regents Canal Conservation Area, under s.66 and s.72 of the Planning (Listed Buildings and Conservation Area) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

#### **Access**



4.7 Policy C6 (Access) 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. Further, BS8300-1:2018 and BS-2:2018 (Design of an accessible and inclusive built environment. External environment - code of practice) provides the following guidance with regards to design standards that would be expected for an accessible phone booth:

- All telephone communication devices for public use should be fitted with assistive technology such as volume control and inductive couplers and there should be an indication of their presence.
- A knee-hole should be provided at least 500mm deep and 700mm high to allow ease of access for wheelchair users.
- Telephone controls should be located between 750mm and 1000mm above the floor level. To benefit people who are blind or partially sighted, telephones should be selected which have well-lit keypads, large embossed or raised numbers that contrast visually with their background, and a raised dot on the number 5.
- Instructions for using the phone should be clear and displayed in a large easy to read typeface
- A fold down seat (450-520mm high) or a perch seat (650-800mm high) should be provided for the convenience of people with ambulant mobility impairments.

4.8 While the height of the proposed telephone controls would appear to be at an appropriate height, there are no details as to whether the controls themselves would be fully compliant (for instance, well-lit keypads, large embossed or raised numbers, etc.). No fold down or perch seat, nor knee-hole provision to allow ease of access for wheelchair users would be provided. Nor any indication that the kiosk is fully access compliant in all other ways, such as, providing clear and suitably displayed instructions for using the phone in a large easy to read typeface. As such, the proposed kiosk is considered unacceptable in terms of providing access for all, contrary to policy C6 and standards advised under BS8300-1:2018 and BS-2:2018.

## **5. 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 existing telephone kiosks within the London Borough of Camden have become 'crime generators' and a focal point for anti-social behaviour (ASB).

5.2 The introduction of a new kiosk is noted as being of particular concern in this location given its proximity to The Stables Market which is an extremely busy tourist attraction during both the day when the market itself is open and during the night when bars, restaurants and clubs operate into the early hours of the morning. It is recognised that when crowds stop or are prevented from moving freely or impeded in some way that public order offences are most likely to occur.

5.3 The Metropolitan Police Crime Prevention Design Advisor also confirmed that Chalk Farm Road and the surrounding area is well known for Class A Drugs Misuse and any well-lit and smooth surface is used for the preparation of such narcotics. This proposed kiosk design appears to provide a recess within which small objects might be stored and concealed, and as such, may prevent police officer's in detecting crime when approaching a suspect drug misuser.

5.4 It is therefore considered that the design and siting of the proposal on this busy footway would introduce additional street clutter, as well as, increase opportunities for crime within a location where there are already safety issues in terms of crime and ASB, 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. Conclusion**



6.1 The proposal would result in unacceptable street clutter, harmful to the character and appearance of the streetscape and the adjacent Regents Canal Conservation Area and Grade II and Grade II\* listed buildings 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. Recommendation**

7.1 Refuse Prior Approval