



LAND ADJACENT THE MET BUILDING
39-45 TOTTENHAM COURT ROAD
LONDON W1T 2AR

PROPOSAL: Erection of freestanding BT Panel providing phone and Wi-Fi facilities, with 2 internally illuminated digital advertisements

Application for planning permission: 2018/4250/P

13 October 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 and seek to establish digital advertising on five sites on Tottenham Court Road. We note that no context assessment and no management or maintenance plan accompanies the application. We also note that no application for advertisement consent accompanies the application although the kiosk is clearly designed to facilitate this.
2. No consideration is given to the impact of the appearance of the panel from the neighbouring Bloomsbury and Charlotte Street conservation areas when it is clear that both sides of the panel are intended to include digital displays.
3. 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, Whitfield Gardens, Alfred Place and this location, which is known as Windmill Square. It is an inappropriate balance of priority that this space should be cluttered by privately owned kiosks/panels, serving a commercial purpose. Open space is a civic amenity to be enjoyed by all.
4. On Tottenham Court Road, at the last count, there were 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. Some have recently been removed as part of the Council's West End Project but there is no need for more of the same. We understand that there are some 26 current applications to place new telephone kiosks on Tottenham Court Road by developers who are looking to take advantage of permitted development rights for telephone infrastructure to place digital advertisement displays on the street. Several more have been refused.

Camden Council has written to the government, urging that planning policy that makes it difficult for councils to challenge permitted development rights for new phone boxes needs to be changed. The statement is available here and is submitted in support of our comments:

<http://news.camden.gov.uk/camden-urges-government-to-act-to-stop-unwanted-phone-boxes/>

We note that this application proposes to remove two existing BT kiosks, which is welcomed.

5. Tottenham Court Road is excessively cluttered with street furniture and is subject to major public realm renewal as part of the 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 Project and any proposal such as this should be a part of and coordinated with the Project's overall public realm strategy for Windmill Square and not

something that is counter to its objectives, the first of which to be implemented was decluttering the area.

6. We understand that urban design proposals for Windmill Square have yet to be developed and it would be contrary to Policy DP24 for a proposal such as this to be considered prior to design proposals for the containing space being finalised.
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 the Met Building has high footfall and is particularly congested and cluttered. When Crossrail and HS2 become operational, there is expected to be a huge increase in pedestrian footfall on Tottenham Court Road. This proposal will add more clutter, further obstruct pedestrian flow and add to what is already an appalling environment for pedestrians and a serious safety hazard.
9. Previously Camden Council erected its own advertising panel at this same location. It obstructed visibility from the adjacent bus stop and was removed on the grounds that it presented a risk to public safety. The asphalted paving repair is still visible. While the bus stop is being relocated as part of the West End Project, the panel may present an even greater risk to the visibility of pedestrians using the pedestrian crossing proposed to take its place. Let's not repeat the same mistake again.

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 application.

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
Kristina Smith, London Borough of Camden
Kevin Stears, London Borough of Camden
Charlotte Street Association
Fitzrovia Neighbourhood Association
Chair, Bloomsbury Association