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**From:** McLaughlin Gavin [REDACTED]  
**Sent:** 19 September 2018 11:31  
**To:** Smith, Kristina  
**Cc:** Crane Anne  
**Subject:** RE: ! 2018/1030/P; Outside Euston Road 235; 18/1843 Tfl comments

Hi Kristina

Thanks for consulting Tfl on this planning application.

Firstly, Tfl objects to the BT InLink unit pending further discussions between the applicant and Tfl on both the specific impacts of this application, particularly on local Tfl stations and bus stops, and progress of the overall BT phone box estate renewal programme across Camden and London as a whole.

As a result I suggest the Council refuses this application and I will suggest to colleagues elsewhere within Tfl that works are not permitted to enable this proposal to proceed.

The Google Map of their current programme of InLink proposals shared with us by the applicant shows 51 approved Removals of old BT phone boxes. How many of these have actually taken place?

The Council must impose conditions to ensure removal of old BT phone kiosks prior to the introduction of any new BT InLink units to the streetscape.

Furthermore, how many of the removals shown on Tottenham Court Road on that Google Map have been carried out, paid for and instigated (i.e. designed into our own public realm improvement scheme) by Tfl? Such removals should not be counted as part of the '2 for 1' BT phone kiosk / InLink replacement/removal arrangement between the applicant and Council.

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 often, BT InLink units 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.

We also 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.**'

BT InLink unites are largely 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.'**

They also do not deliver any improvements that support any of the ten Healthy Streets Indicators.

Finally, the site of the proposed development is on Euston Road, which forms part of the Transport for London Network (TLRN). TfL is the highway authority for the TLRN, and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN. Section 31 of the Traffic Management 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.

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

Furthermore, at this location, TfL is currently working with HS2 and Network Rail to masterplan pedestrian movements in support of a station upgrade. The area is due to face considerable disruption and construction impacts. We therefore suggest BT focus elsewhere until our ongoing efforts to declutter and improve the area have concluded.

We have previously met with the applicant, and requested they make use of the TfL Preapplication service for each 30-50 potential new InLink sites proposed to a Borough in the roll-out programme: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice>

This would enable TfL to resource the cases appropriately and provide formal comments in writing prior to submissions. We would also invite input from Camden.

We request clarification from the applicant and Council on the progress of approved removals which are being used as a material consideration to justify approval of applications similar to this one across London. We request evidence of when and how removals are taking place, to consider in relation to the relevant London Plan policies referred to above.

Thanks and kind regards,

**Gavin McLaughlin | Principal Planner**

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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>

