

Objection to various Planning applications for telephone Kiosks.

23rd November 2018

All relate to proposed new phone kiosks on Tottenham court road. There are currently 42 phone kiosks on this one stretch of road which are operated by three separate operators. Applications are in for a further six kiosks by this additional operator. (Three of which are referred to in this document) This would give a total of 48 phone kiosks which would mean that there would be a kiosk approximately every 22m. Even before the advent of mobile phone technology this would be considered highly excessive with the recommendation at the time being something in the region of 200m and so these proposals are around one tenth of that recommendation.

None of the applications make reference to existing street furniture which is relevant when assessing the siting of these new boxes.

The additional kiosks are of no benefit to either residents, businesses or visitors and in fact are quite the opposite. The kiosk are used for everything bar making phone calls. There use for anti-social behaviour is renown in the area. They are used for drug dealing, they display an array of cards advertising prostitution and are used as urinals. They are used by rough sleepers. They are not maintained and are generally kept in a disgusting state. All irrespective of the operator. They add to street clutter all of which go against the cleaner safer street policy of the council. The additional kiosks will mean that we will get additional complaints because they will be used as the existing ones are putting additional pressure on what is already a challenging financial position that the council face.

We are looking to declutter the highways of the borough and in particular Tottenham Court road as part of the council's west end project. The proposal to install additional street clutter in the form of additional phone kiosks which have no benefit bar affording the opportunity for advertising revenue for the operator will set back this program and send a message to all that we are not in a position to implement council policy. Safety must be a consideration here when reviewing as part of the siting element.

Safety must also be considered as part of the design. The monolithic design has the phone apparatus on one side of the unit. This means that anyone using the unit is not visible to a people approaching from the opposite side. This cannot be considered safe. All other phone kiosk designs have the user visible at all times. My understanding from PD rights is that this has to be the case when looking at static advertising on the glass panels of phone kiosks. The design also utilises old technology in that it uses a traditional handset These are vandalised on a regular basis meaning unless regularly maintained (which on past evidence they are not) means that the unit is not fit for purpose for long periods of time.

None of the proposed sites have taken into consideration the major redevelopment that is taking place in this area the aim of which is to make the councils streets

cleaner and safer for those who live work and visit the borough. This is also part of the modal shift which, supported by the mayors transport policy, aims to get more people walking thus reducing traffic congestion and improving air quality. This is also underpinned by the government and the Department for Transport cycling and walking investment strategy. Additional street clutter does not support this modal shift and would therefore not be in line with any transport policy either locally or nationally.

Under the Ofcom electronic communications code, code of practice

Under the heading **new agreements for the installation of Apparatus** section 1.14 states

“Additional apparatus can be required for a number of reasons such as

- Customer demand
- To provide coverage to new areas
- To provide additional network capacity
- To provide new services
- To replace obsolete sites or sites that are being redeveloped”

I would suggest that it can be reasonably argued that none of the above apply in the case of any location on Tottenham court road.

Within the document there is a section Stage 2: Consultation and agreement. Which includes “consulting with the Local Planning Authority”. As there has been no pre application then I would argue that they have not conformed to the regulators code of practice.

In a recent article Ashley Smatt a Director of Maximus Networks commented that” the units can successfully replace many public telephone boxes across the country” what he failed to mention is that Maximus are not replacing the existing telephone boxes as they do not belong to them but are in fact adding to the street clutter” he also states that “telephone boxes are part of our infrastructure like railways and utilities. Their purpose is only governed by the laws of public demand.” With 42 existing public telephone boxes in Tottenham court road I think it can be safely assumed there is no demand for further boxes. He also states “that the reality is that all too often our mostly urban boxes are neglected, badly maintained and a focus for vandalism.” This is very much the case in Tottenham Court Road and additional urban boxes that Maximus wish to install will not improve this situation but add to the problem that he by his own admission exists.

Planning application number **2018/5562/P**

Location: Land adjacent to 90 Tottenham Court Road

This space is allocated to new cycle racks as part of the west End Project in support of the council's healthy streets agenda.

Planning application number **2018/5531/P**

Location: Land adjacent to 80 to 85 Tottenham Court Road

This sits behind an existing retail kiosk. I understand there is an existing application in this area from another operator.

Planning application number **2018/5527/P**

Location. Land adjacent to 23 Tottenham Court Road

This location is already occupied by 2 telephone kiosks from a different operator.

Kevin Stears

Project Manager –West End Project

Transport Strategy

London Borough of Camden