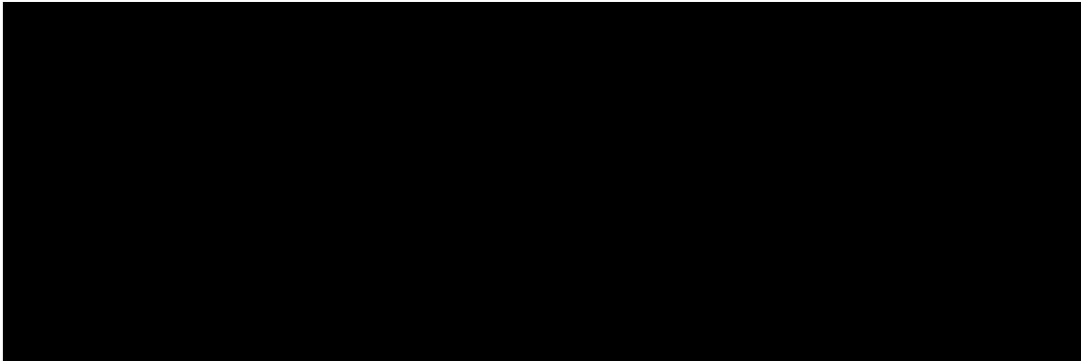




Dear Planning Inspectorate

I am a Principal Transport Planner at the London Borough of Camden (otherwise known as Camden Council). My original transport observations on the planning application are below for reference. I would like to provide some further transport observations on the proposal to site a telephone kiosk at the above location.

The site is located on Tottenham Court Road (A400) which forms part of the strategic road network (SRN). Camden Council is the highway authority, although it should be noted that Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is located directly adjacent to Warren Street underground station. A high number of bus services serve bus stops along both sides of Euston Road and Hampstead Road, and on Tottenham Court Road. Tottenham Court Road is currently a one-way road with vehicular traffic travelling in the northbound direction. Records indicate that 44 telephone kiosks are already located on the pavements along the Tottenham Court Road corridor. The Council is currently implementing a £35M package of measures which will transform the public realm in this part of the borough (West End Project). Tottenham Court Road will become a two-way road, with only buses and cyclists permitted at peak times. The project includes the widening of pavements and rationalisation of street furniture zones with the aim of accommodating very high volumes of pedestrians both now and in the future. It should be noted that pedestrian volumes are forecast to grow significantly with economic growth in Central London, Crossrail due to open shortly and High Speed Two (HS2) currently under construction. The Council has been working closely with existing telephone kiosk owners such as BT and New World Payphones (NWP) with a view to reducing the number of telephone kiosks within the project area. These operators have been (and are) coming forward with new proposals to replace existing telephone kiosks with modern designs which include various benefits to the general public. These include free phone calls, free wifi and internet usage and free charging points for mobile phones and other electronic devices (e.g. tablets). The operators have agreed to remove up to 4 existing telephone kiosks for every renewal which gains approval. This is of enormous public benefit and helps the Council achieve its decluttering objectives (one of the main objectives of the West End Project). I have attached a copy of the construction drawings for reference.

The site is located within 20 metres of a junction controlled by traffic signals. This includes a dedicated pedestrian crossing across Tottenham Court Road. However, observations indicate that pedestrians also cross the road at the site where the telephone kiosk would be located. This is a similar situation to 2 similar applications on Hampstead Road adjacent to Euston Tower. The Planning Inspector in dismissing those appeals noted that pedestrians crossed the road at those locations even though there were dedicated pedestrian crossing facilities nearby. The Planning Inspector took the view that introducing a telephone kiosk where pedestrians cross the road would introduce an unnecessary hazard. The 2 appeal dismissals are included in the attached decision

report which covers various refusals along the Euston Road corridor. Paragraphs 20-23 and the conclusions at the rear of the decision report are particularly relevant to this current appeal.

The proposed kiosk would be located directly adjacent to the main entrance to Warren Street underground station. It is worth noting that large groups of people have been observed congregating on the footway at this location. This has the effect of reducing the effective footway width available for pedestrian movement, albeit intermittently throughout the day.

Policy T1 of Camden's Local Plan states that to promote sustainable transport choices, development should prioritise the needs of pedestrians and cyclists and ensure that sustainable transport will be the primary means of travel to and from the site. It goes on to state that the Council will seek to ensure that developments improve the pedestrian environment, including the provision of high quality footpaths and pavements for the number of people expected to use them. It also states that features should be included to assist vulnerable road users where appropriate.

Camden Planning Guidance document CPG1 (Design) provides some guidance on telephone kiosks. Paragraph 9.27 includes the following text:

- ∞ *All new phone boxes should have a limited impact on the sightlines of the footway. The size of the box or other supporting structure that the phone box is in should be minimised to limit its impact on the streetscene and to decrease the opportunities for crime and anti-social behaviour.*

Camden Planning Guidance document CPG7 (Transport) provides some guidance on street furniture. Paragraph 8.6 states that the Council will seek improvements to streets and spaces to ensure good quality

- ∞ access and circulation arrangements for all. This includes improvement to existing routes and footways that will serve the development. Key considerations informing the design streets and public spaces include:
 - ensuring the safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments, and other disabilities; taking account of surrounding context and character of area;
- ∞ providing a high quality environment in terms of appearance, design and construction, paying attention to Conservation Areas;
- ∞ avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed, e.g. by pavement parking or by street furniture.

Paragraph 8.10 of CPG7 states that works affecting highways should avoid unnecessary street clutter; design of footways should not include projections into the footway, unnecessary and cluttered street furniture or other obstructions; and any minimum standards for footway widths should not be used to justify the provision of unnecessary street clutter or reduction in footway widths.

Standard telephone kiosks have a footprint of 0.9 metres x 0.9 metres (0.81 sqm). BT has minimised the size of their replacement kiosks (BT InLink) by designing a unit with a footprint of 0.89 metres x 0.27 metres (0.24 sqm). The proposed telephone kiosks would have a footprint of 1.325 metres x 0.55 metres (0.73 sqm). The footprint of the proposed telephone kiosk is broadly similar to that of a standard telephone kiosk and would be 3 times greater than the new BT replacement kiosks. And the longer of the 2 horizontal dimensions (1.325 metres) would be 435 mm wider than the new BT replacement kiosks (0.89 metres). The applicant has clearly failed to minimise the size of the telephone kiosk in accordance with Camden's guidance.

The Council generally refuses any applications to install new items of street furniture of this scale in the public highway unless they can be located within a defined and established street furniture

zone. This is especially relevant where such proposals would constitute clutter or have a detrimental impact on pedestrian amenity, comfort or safety, as well as being detrimental to road safety generally.

The proposed site is located approximately 20 metres to the south of a junction and pedestrian crossing controlled by traffic signals in a Central London location. Transport for London (TfL) has published a document titled 'Streetscape Guidance'. This is available on TfL's website at the hyperlink below:

<https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-0>

The section on safety at pedestrian crossings on page 142 includes the following text:

∞ Sightlines at crossings should not be obstructed by street furniture, plantings or parked/stopped vehicles.

This is a similar situation to a telephone kiosk application for which an appeal was dismissed on the pavement outside 29-31 Euston Road, London NW1 2SD. The Planning Inspector concluded that the proposal to locate a telephone kiosk in close proximity to traffic signals would constitute an unnecessary hazard. The decision is contained with the attached report covering various sites along the Euston Road corridor. I would specifically refer the Planning Inspector to paragraph 36 and the conclusion of the report. I would ask the Planning Inspector to dismiss this appeal on the same grounds.

The footway on the west side of Tottenham Court Road at the above site is characterised by a complete lack of bulky street furniture adjacent to the kerbside. It is noted that a large retail kiosk is located approximately 10 metres to the south. However, this is considered to be an isolated item of street furniture. A slender street furniture zone consisting of litter and recycling bins and a signal pole has been sensitively designed to provide a clear and uncluttered environment sufficient to accommodate extremely high volumes of pedestrians walking on the footway during busy periods (e.g. morning, lunchtime and afternoon/evening peak periods). The proposal to site a telephone kiosk would spoil this uncluttered design by introducing a prominent feature that would look out of place. Please also note that when viewed from the east side of the road, the kiosk would partially obstruct views to the entrance to Warren Street underground station. The proposal would therefore have an unacceptable impact on the street scene. I would ask the Planning Inspector to refer to the appeal decisions to refuse similar telephone kiosk applications on the pavement outside Euston Tower on west side of Hampstead Road, London NW1 3DP (planning references 2017/3527/P and 2017/3542/P). This decision is within the attached report. Paragraphs 20-23 and the conclusions at the rear of the decision report are particularly relevant to this current appeal. I would ask the Planning Inspector to dismiss this appeal on the same grounds.

Appendix B of 'Pedestrian Comfort Guidance for London (published by Transport for London) indicates that footways in high flow areas should be at least 5.3 metres wide with a minimum effective footway width of 3.3 metres. The proposed site plan indicates that the footway is approximately 6.6 metres wide. The plan also indicates that the resulting effective footway width would be reduced to 4 metres. This would exceed the minimum requirement of the guidance. However, the loss of any available footway space at this location is considered to be unacceptable due to the close proximity to Warren Street underground station and the nearby pedestrian crossings. Pedestrian footfall is exceptionally high at this location and this is predicted to increase significantly with ongoing economic growth in Central London, Crossrail due to open shortly and High Speed Two (HS2) currently under construction.

I would ask the Planning Inspector to refer to the appeal decision to refuse a similar telephone kiosk on the pavement outside Fitzroy House, 355 Euston Road, London NW1 3AL (planning reference 2017/3544/P). This decision is within the attached report. Paragraph 15 is particularly

relevant to this current appeal. I would ask the Planning Inspector to dismiss this appeal on the same grounds.

It should be noted that 3 existing telephone kiosks are located within 50 metres of the site on Euston Road (also adjacent to Warren Street Underground Station). The proposal to introduce an additional telephone kiosk would merely introduce unnecessary street clutter to an uncluttered pedestrian environment.

The proposed telephone kiosk would be significantly wider than the established street furniture zone in the general vicinity of the site. It would as a result encroach significantly into the effective footway width available for pedestrian movement. The proposed telephone kiosk would therefore obscure sightlines along the footway significantly while also constituting a significant impediment/obstruction to pedestrian movement along the pedestrian desire line. This would be a particular problem for pedestrians with visual impairments (e.g. blind and partially sighted) who rely on clear and unobstructed pedestrian routes. Paragraph 6.3.10 of the Manual for Streets states:

- ∞ *Obstructions on the footway should be minimised. Street furniture is typically sited on footways and can be a hazard for blind or partially-sighted people.*

The proposed telephone kiosk, by being significantly wider than the established street furniture zone and encroaching significantly into the effective footway width available for pedestrian movement, is deemed to be a hazard for blind or partially-sighted people.

Paragraph 6.3.23 of the Manual for Streets states:

- ∞ *Footway widths can be varied between different streets to take account of pedestrian volumes and composition. Streets where people walk in groups or near schools or shops, for example, need wider footways. In areas of high pedestrian flow, the quality of the walking experience can deteriorate unless sufficient width is provided. The quality of service goes down as pedestrian flow density increases. Pedestrian congestion through insufficient capacity should be avoided. It is inconvenient and may encourage people to step into the carriageway.*

The proposed telephone kiosk, by being in a high footfall area, would have a detrimental impact on the walking experience due to a reduction in the level of service. It would lead to pedestrian congestion which could result in dangerous situations such as pedestrians walking in the carriageway or pedestrians colliding with each other or indeed with the telephone kiosk.

I have received some objections from local residents objecting to the proposal (see emails attached). These raise serious concerns about crime and anti-social behaviour problems which are known to take place at telephone kiosks in the general vicinity of the site. I would ask the Planning Inspector to dismiss this appeal on this basis.

The proposed telephone kiosk would clearly have a significant impact on pedestrian amenity, comfort and safety. For these reasons, the proposal is considered contrary to Local Plan policies A1 and T1 and should be refused on this basis.

I would ask the Planning Inspector to review the conclusions to the attached decision reports which cover the refusal of various telephone kiosks on the Euston Road corridor (nearby). I believe the conclusions to be applicable to this appeal.

In summary, I would respectfully ask the Planning Inspector to dismiss this appeal for the reasons given above.

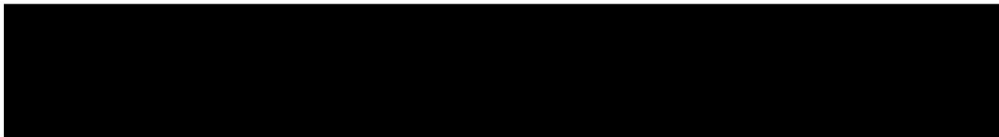
Other applications referred to in this email can be viewed at the hyperlink below using the planning reference provided:

<http://planningrecords.camden.gov.uk/Northgate/PlanningExplorer17/GeneralSearch.aspx>

Regards
Steve

Steve Cardno
Principal Transport Planner

Telephone: 020 7974 8800



Hi Tony

I have completed my assessment of the above application. This included conversations with colleagues in Highways and the West End Project delivery team.

The site is located 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.

The telephone kiosk would be located in a defined street furniture zone on the footway, adjacent to the kerb. However, this street furniture zone is to be rationalised significantly as part of the West End Project, a £35M public realm improvement scheme which is about to be implemented by the Council. This will involve the removal of redundant items of street furniture including outdated telephone kiosks to provide additional footway space for pedestrians. The introduction of a new telephone kiosk would therefore work against the aims of the West End Project.

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. The proposal therefore constitutes a hazard to public safety.

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.

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.

The telephone kiosk would be located within 20 metres of the nearest traffic signals. This would be a problem if a follow up application for digital advertising consent were to be submitted. Transport for London guidance for roadside digital advertising states that any such

proposals will not be supported within 20 metres of traffic signals. Any such proposal would be strongly resisted due to the road safety implications on the approach to a traffic signal controlled junction.

The proposal must be refused for the above reasons. Please let me know if you wish to discuss.

Regards

Steve

Steve Cardno
Principal Transport Planner
Regeneration and Planning
Supporting Communities
London Borough of Camden

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.

This e-mail may contain information which is confidential, legally privileged and/or copyright protected. This e-mail is intended for the addressee only. If you receive this in error, please contact the sender and delete the material from your computer. See our new Privacy Notice [here](#) which tells you how we store and process the data we hold about you and residents.