

Application No:	Consultees Name:	Received:	Comment:	Response:
2018/5555/P	Elizabeth Bax, Covent Garden Community Association	15/12/2018 21:38:33	OBJNOT	<p>Covent Garden Community Association (CGCA) OBJECTS to the application by Maximus Networks to install a 'Max 2' public telecommunications panel on the pavement outside 166 High Holborn WC1V 6TT.</p> <p>In principle the Covent Garden Community Association and other West End amenity groups object to all but a very few telephone terminals being placed on the streets of the West End of London (one per 100m at most). We therefore continue to support moves by you as a local authority to change the outdated laws on telecoms equipment that lead to modern units cluttering our streets, acting as magnets for antisocial and sometimes criminal behaviour, and placing large amounts of unwelcome advertising on footways.</p> <p>We will not repeat the data that shows low demand for telecoms equipment on the street. In the West End of London, in particular, such demand is largely satisfied by ample payphones in public houses, theatres, cinemas and department stores to serve people who are in emergency situations but with no functioning mobile phone.</p> <p>A 'Max 2' panel would not be at all appropriate by reason of:</p> <ol style="list-style-type: none"> Its disproportionate size at over 3 metres in height and 1.3 metres in width. The introduction of intrusive, internally-lit advertising in the middle of a currently attractive footway in a historic district along the border of Bloomsbury conservation area. Obstruction of a busy footway close to a theatre. An additional item installed on this footway would lead to an unacceptable level of obstruction, particularly in the context of local authorities expending resources to remove as much street furniture as possible in the West End. The close proximity of the site to existing telephone kiosks. Indeed, there is an existing kiosk on this same pavement, but the application makes no reference to this application being for replacement. The way in which these units attract criminal and antisocial behaviour, when this area is already plagued by street drug crime and prostitution. Existing kiosks in the area have become hang-outs for drug gangs, and we have reports from the police that existing telecommunication panels in other areas such as Kings Cross are no better. For example, on 09/03/18 Sgt. D. Hodges wrote "The new systems by 'Inlink' outside Euston station, which allows free calls, although they look great, they are now being used by drug users to call their drug dealers. You now have a huge problem of drug users congregating around them, which is yet another problem for police to deal with. This is an example of no matter how much innovation you put into new boxes, the result is the same, drugs and crime." <p>We would also like to point out that the otherwise very detailed diagram of the proposed unit provided by the applicant shows no part labelled explicitly as an advertising screen. There is an area labelled 'non-illuminated display panel', but non-illumination seems unlikely. Since this seems to be a new design of unit, we have not found the information publicly available either.</p> <p>We ask you as the planning authority to request clarity on whether this is a replacement or additional unit, and to request a diagram that includes the important data about illumination and advertising. Please publicise these and re-consult accordingly.</p>

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If you were in some way obligated to allow a new telecoms panel here then we ask, at the very least, that any consent would be conditioned upon:

1. Advertising being rated at no older than age 12, for a family audience.
2. Advertising being subject to other controls by the local authority from time to time, for example to exclude foods found to be unhealthy.
3. Weekly cleaning and maintenance being an enforceable condition for planning permission, the penalty for non-compliance being permanent removal of the panel.

However, we draw your attention to the fact that Westminster City Council are refusing these telecoms panels. A typical decision notice includes these paragraphs:

"The City Council has considered your application pursuant to Part 16 of Schedule 2 of the above Order and determines that prior approval is required for the siting and appearance of the works set out in Schedule A in respect of the drawings set out in Schedule B.

The City Council also determines that the approval is hereby REFUSED for the following reason(s):

1. Because of its appearance, size and siting within the street scene, the freestanding advertising / telecommunications structure would be harmful to visual amenity and add street clutter to this part of the City. This would not meet S25 and S28 of Westminster's City Plan (November 2016) and DES 1 and DES 7 of our Unitary Development Plan that we adopted in January 2007.
 2. Because of its size and siting, the freestanding advertising / telecommunications structure will reduce the width of the footway to an unacceptable level, adversely impacting upon direct, safe and convenient pedestrian movement. This would be contrary to S41 of the Westminster City Plan (November 2016) and TRANS3 of the Unitary Development Plan (2007) and Westminster Way (2011).
 3. The application for prior approval does not fall within the ambit of Part 16 of the Town and Country Planning (General Permitted Development) (England) Order 2015, as it is not considered to be for the purpose of the electronic operator's communication network and it is not required for those purposes."
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