

Hi Adam

I have reviewed the above application and wish to make some transport observations.

Site Location

The site is located on Pancras Road (A5202) 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 in a high footfall area in Central London near Kings Cross and St Pancras International Stations. The site is located directly adjacent to Google's headquarters in London as well as the other large offices in Pancras Square. Pedestrian volumes are extremely high and are forecast to increase significantly when Crossrail services become operational (was due to be December 2018 but now forecast for the end of 2020) along with ongoing economic growth in Kings Cross and Central London. Existing footway space is a scarce resource and must be safeguarded for pedestrians both now and in the future to accommodate economic growth.

Proposal

The development description is as follows for ease of reference:

- *Replacement of existing telephone kiosk with new telephone communication hub ('Prior approval' application under Part 16, Sch 2 of Town and Country Planning (General Permitted Development Order).*

The development description is misleading as it would not result in the replacement of an existing telephone kiosk at the site. Rather, the proposal would involve the installation of a new telephone kiosk at the site. The proposed kiosk would be 1,338 mm wide, 2,630 mm high and 917 mm deep (includes 600 mm wide canopy above the telephone and associated touchscreen. Interestingly, the touchscreen would only be 392 mm wide. It is therefore unclear why the actual kiosk needs to be so much wider. It is clear that the proposed width is significantly greater than necessary.

Policy and Guidance

Paragraph 6.9 of Policy A1 of Camden's Local Plan includes the following statement:

- *Any development or works affecting the highway will also be expected to avoid disruption to the highway network.*

Paragraph 6.10 of Policy A1 states:

- *Highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.*

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 CPG Design provide guidance on street furniture. Paragraph 7.37 states:

- *The design of streets, public areas and the spaces between buildings, needs to be accessible, safe and uncluttered. Well-designed street furniture and public art in streets and public places can contribute to a safe and distinctive urban environment.*

Paragraph 7.38 of CPG Design states:

- *All features within public space and elements of street furniture should be designed to make a positive contribution to community safety and discourage anti-social behaviour. Careful consideration should therefore be given to their location and detailed design. Street furniture should not obstruct pedestrian views or movement or be positioned to encourage anti-social behaviour or concealed areas.*

Paragraphs 7.41 and 7.42 of CPG Design provide guidance on telephone boxes (telephone kiosks). Paragraph 7.41 of CPG Design includes the following text:

- *In all cases we will request that the provider demonstrates the need for the siting of the new facility. We will consider whether kiosks add to the street clutter and if there are existing phone kiosks in the vicinity.*

Paragraph 7.42 of CPG Design states:

- *All new phone boxes should have a limited impact on the sightlines from or of the footway and should not hamper pedestrian movement. The size of the 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. The remaining minimum footway width should comply with the Transport for London Streetscape Guidance and Pedestrian Comfort Guidance, and with Camden's Streetscape Design Manual. Designs which are dominated by advertising space are not acceptable. Any advertising should not be placed where it significantly reduces natural surveillance or CCTV coverage of, or into, the call box. Designs should seek to maximise views into and through the phone box and along the footway. Furthermore where any phone infrastructure also includes advertising, the guidance on advertising should be taken into account.*

Camden Planning Guidance document CPG Transport provides guidance on the design and layout of streets and public spaces. Paragraph 9.7 details the key considerations to be given to the movement of people in and around a site. This includes

- *Avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed, e.g. by footway parking or by unnecessary street furniture; and*
- *Having due regard to design guidance set out in the Camden Streetscape Design Manual, TfL's London Cycling Design Standards, TfL's Pedestrian Comfort Level Guidance and TfL's Healthy Street Indicators.*

Paragraphs 9.17 to 9.20 of CPG Transport provide guidance on street furniture. Paragraph of CPG Transport 9.18 discusses street furniture generally (this includes telephone kiosks without this actually being stated explicitly) and states:

- *The installation of seating, bus shelters, litter bins and cycle parking is encouraged in association with new footways and footpaths provided that it will improve the pedestrian environment or encourage the use of sustainable modes of transport. They must be positioned so that they do not interrupt the pedestrian desire line and so they do not interrupt the minimum area of footway or footpath designated for pedestrians as set out within TfL's Pedestrian Comfort Level guidance.*

Paragraph 9.19 of CPG Transport provides guidance on telephone kiosks and states:

- *Applications for new telephone kiosks on the public highway will be resisted by the Council where proposals would result in a detrimental impact on pedestrians and/or the street environment. Applications of this nature must demonstrate that they would not interrupt the minimum area of footway or footpath required and would not impede or obstruct the desire lines for pedestrian movement. This is particularly important for people with protected characteristics such as people who are blind or partially sighted. The position of the kiosk must be within the existing street furniture zone and must not compromise highway safety or prevent kerbside activity such as loading/unloading and parking.*

Paragraph 9.20 of CPG Transport states:

- *Any minimum standards for footway widths should not be used to justify the provision of unnecessary street clutter or any reduction in footway or footpath widths. The Council will take into account the full unobstructed width when assessing proposals.*

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.*

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.*

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.*

Transport for London (TfL) has also published a document titled 'Kerbside Loading Guidance'. This is available on TfL's website at the hyperlink above. The section on kerb length required on page 36 of the document includes the following text:

- *Railings and other kerbside street furniture (utility cabins, bins, signs) can deter and hinder loading activity and should therefore not be placed alongside lengths of kerb where loading is to be encouraged.*

The section on bollards, street furniture and other vertical obstacles on page 41 of the document includes the following text:

- *Strategic placement of bollards creates the opportunity to sign loading facilities or physically prevent access by inappropriate vehicles. However, bollards can impede reasonable movement by vehicles, so where possible avoid them. They can also interfere with the transfer of goods to the surface and their movement using manual handling aids. In particular, pallets will be impeded by bollards placed too close together. The same principles apply to other common street furniture and statutory undertakers' equipment. Examples include phone boxes.*

Technical Assessment

The site would not be located directly adjacent to a loading bay. However, it would be located directly adjacent to a section of carriageway where nearby commercial premises are likely to accept their deliveries from. In addition, observations indicate that taxis pick up and drop off passengers at this location. This section of footway should therefore be kept clear from bulky items of street furniture such as the type of telephone kiosk being proposed.

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 kiosk would have a footprint of 1.338 metres x 0.917 metres (1.227 sqm). The footprint of the proposed telephone kiosk is significantly larger than that of a standard telephone kiosk and would be 5 times greater than the new BT replacement kiosks. And the longer of the 2 horizontal dimensions (1.338 metres) would be 448 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 footway on the east side of Pancras Road at the above site is characterised by a complete lack of bulky items of street furniture adjacent to the kerbside. There are some slender lamp columns and sign posts in the general vicinity of the site. However, these take up very little footway space with the lamp columns having

a diameter of 200 mm at their base. This helps to promote clear and unobstructed sightlines along the edge of the pedestrian environment. The street furniture zone adjacent to the pedestrian route (pedestrian desire line) 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 at the proposed site would spoil this uncluttered design by introducing a prominent feature that would look out of place and be overly dominant. The proposal would therefore have an unacceptable impact on the street scene.

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 suggests that the footway is approximately 4.95 metres wide. I measured the footway width as being 5 metres wide. The proposed offset from the kerb of 0.5 metres would be acceptable. The plan also indicates that the resulting effective footway width would be reduced to 3.12 metres. The reduced effective footway width is contrary to the aforementioned guidance and is considered to be insufficient for a footway with high pedestrian flows in a Central London location. The proposal should be refused on this basis.

The proposal represents a similar situation to a similar application on the pavement outside Fitzroy House, 355 Euston Road (appeal reference APP/X5210/W/18/3195370; planning reference 2017/3544/P). This decision is within the attached report titled Various Appeal Decisions 18-09-18. Paragraphs 13-15 and the conclusions at the rear of the decision report are particularly relevant to this current application. The proposal should be refused on the same grounds.

Observations indicate that pedestrians cross the road at this location, even though dedicated pedestrian crossing facilities are located 10 metres to the north of the site. The proposal represents a similar situation to 2 similar applications on the pavement outside Euston Tower on west side of Hampstead Road (appeal references APP/X5210/W/18/3195366 and APP/X5210/W/18/3195365; planning references 2017/3527/P and 2017/3542/P). The Planning Inspector in dismissing those appeals noted:

- *The kiosk would impinge here into a clear area uncluttered by any street furniture, which has been sensitively designed. As such it would spoil this uncluttered design by introducing a prominent feature that would look out of place.*
- *A kiosk here would not significantly interfere with pedestrian flows. But the site is close to the pedestrian crossing on Hampstead Road and I noticed that people also cross the road here. The depth and height of the kiosk would interfere with pedestrians' visibility of traffic travelling north at this point, which in my view would present a needless hazard.*

These decisions are within the attached report titled Various Appeal Decisions 18-09-18. Paragraphs 20-23 and the conclusions at the rear of the decision report are particularly relevant to this current application. The proposal should be refused on the same grounds.

The appeal decisions to refuse similar telephone kiosk applications on the pavement outside 186-188 Camden High Street (appeal reference APP/X5210/W/17/3202896; planning reference 2017/5418/P) and 197-199 Camden High Street (appeal reference APP/X5210/W/17/3202763; planning reference 2017/5420/P) are worthy of reference. These decisions are within the attached report titled Various Appeal Decisions 19-12-18. Paragraphs 41-43 and 44-48 and the conclusions at the rear of the decision report are particularly relevant to this current application. The proposal should be refused on the same grounds.

Summary and Conclusions

The proposal to install a telephone kiosk at the above site would introduce a significant physical and visual obstruction to a clear and unobstructed pedestrian environment. This would result in the loss of at least 1.83 metres of footway space in the pedestrian desire line (includes the 500 mm offset from the kerb). This is unacceptable in such a high footfall location in Central London in such close proximity to 2 very busy transport interchanges. The proposal should be refused on this basis.

The proposed telephone kiosk being located outside of the established street furniture zone, would encroach significantly into the effective footway width available for pedestrian movement (i.e. the pedestrian desire line). 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. The proposed telephone kiosk would therefore constitute an unnecessary obstruction/impediment and a hazard for blind or partially-sighted people. The proposal should be refused on this basis.

The proposed telephone kiosk, by being in a high footfall area, would have a detrimental impact on the walking experience due to a significant 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 and colliding with each other or vehicular traffic, or indeed with the telephone kiosk. The proposal should be refused 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.

In summary, I recommend refusal for the various reasons given above.

Regards
Steve

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Supporting Communities
London Borough of Camden