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| Delegated Report | | Analysis sheet | Expiry Date: | 19/03/2018 |
| | | N/A / attached | Consultation Expiry Date: | 22/02/2018 |
| Officer | | | Application Number(s) | |
| Tony Young | | | 2018/0324/P | |
| Application Address | | | Drawing Numbers | |
| Land Adjacent to 121 Shaftesbury Avenue London WC2H 8AD | | | Refer to draft decision notice | |
| PO 3/4 | Area Team Signature | C&UD | Authorised Officer Signature | |
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| Proposal(s) | | | | |
| Installation of 1 x telephone kiosk on the pavement. | | | | |
| Recommendation(s): | Prior Approval Required – Approval Refused | | | |
| Application Type: | GPDO Prior Approval Determination | | | |

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| Conditions or Reasons for Refusal: | Refer to Draft Decision Notice | | | | | |
| Informatives: | | | | | | |
| Consultations | | | | | | |
| Adjoining Occupiers and/or residents: | No. notified | 00 | No. of responses | 02 | No. of objections | 02 |
| Summary of consultation responses: | <p><u>A site notice was displayed on 31/01/2018 and expired on 21/02/2018</u></p> <p><u>A press notice was advertised on 01/02/2018 and expired on 22/02/2018</u></p> <p>In response to the proposal, an objection was received from a resident at <u>Flat 18 Russell Square Mansions, 122 Southampton Row</u> as follows:</p> <ul style="list-style-type: none"> • I do not believe that it provides any public benefit as there are enough existing phone boxes for the very small number of people who need to use a telephone on the move but do not have a mobile phone. • I also believe that this will constitute a threat to public safety and an obstruction to free movement of people on the already crowded pavements. Phone boxes seem merely to serve as a place for pimps to place cards advertising prostitutes which merely results in litter on the pavement when one card poster removes one set of cards to replace them with another. • This application seems merely an attempt to get advertising space on the street without admitting as much. <p>In response to the proposal, an objection was received from a resident at <u>68A Neal Street</u> as follows:</p> <ul style="list-style-type: none"> • I strongly object to the installation of a public call box at this location. The proposed public call box would add to street clutter and presents a safety hazard as it obstructs the flow of pedestrian traffic in an area of high pedestrian and vehicle traffic density. • There is no need for public call boxes in this location – existing public call boxes nearby are only used as a shield for drug dealing/using and other anti-social behaviours, and are never used for their intended purpose as virtually all UK residents and tourists carry mobile phones. • Furthermore, the proposed development is adjacent to a conservation area and would have a negative impact on the Seven Dials (Covent Garden) Conservation Area. <p>In response to the proposal, an objection was received jointly on behalf of <u>Bloomsbury Residents Action Group (BRAG)</u> and <u>Bloomsbury Conservation Area Advisory Committee</u> as follows:</p> <ul style="list-style-type: none"> • As residents of Bloomsbury, we are concerned about the quality of the environment in which we live. • Existing telephone kiosks attract litter, unofficial adverts and antisocial behaviour, and consequently. • Object to the endless applications for more unwelcome kiosks, which seem utterly irrelevant in today's era of mobile phone communication. <p>In response to the proposal, an objection was received on behalf of <u>Covent Garden Community Association</u> as follows:</p> <ul style="list-style-type: none"> • The phone kiosk is unnecessary, as the proposed location is near an | | | | | |

existing phone box at 167-169 Shaftesbury Avenue. The applicant has not made a case at all that justifies why a second phone kiosk is needed directly next to an existing one.

- Like other areas in Camden, Covent Garden has its own character and identity (Local Plan D1 & D2). The proposed telephone kiosk fails to preserve or enhance the historic nature and unique character of the Seven Dials (Covent Garden) Conservation Area (D1 & D2). According to Local Plan policy D1, careful consideration must be given to the characteristics of a development site, features of local distinctiveness, and the wider context in order to achieve high-quality development which integrates into its surroundings. Shaftesbury Avenue, where this phone kiosk is proposed to be located, is an iconic road in the heart of London's historic West End. Camden's planning policy is clear that the Council expects development to retain the distinctive characters of the conservation area and new development must contribute positively to this. Para 7.46 of the Local Plan (see D2) specifies that the Council "will only grant planning permission for development in Camden's conservation areas that preserves and enhances the special character or appearance of the area." Also see CPG1 2.6 and CPG1 2.9.
- The proposed telephone kiosk would result in visual street clutter that detracts from the character of the conservation area and that goes against Camden's aim of reducing visual street clutter (see Streetscape Design Manual, Chapter 4). Such street clutter has a significantly adverse effect on the appearance of the streetscape and the amenity of the area. Local Plan policy C5 also specifies that the design of streets, public areas, and the spaces between buildings needs to be uncluttered.
- The proposed telephone kiosk would further continue to visual clutter as its primary function would be to serve as an advertising presence. Indeed, the location chosen is a high-traffic area, both in terms of vehicles and pedestrians. CPG1 para 8.9 says advertisements in conservation areas and on or near listed buildings require detailed consideration given the sensitivity and historic nature of these areas or buildings. Any advertisements on or near a listed building or in a conservation area must not harm their character and appearance.
- The proposed telephone kiosk presents a safety hazard, as it obstructs the flow of pedestrian traffic, as well as wheelchairs and prams, at this location, which experiences high footfall.
- As the Metropolitan Police have noted – and to which local residents can attest – phone boxes and kiosks are heavily used for crime and antisocial behaviour. As police constable and Design Out Crime Officer Jim Cope says, phone boxes in Camden are "crime generators" (see Met Police comments). Phone boxes and kiosks conceal criminal behaviour, including drug activity. Whilst the applicant claims a need for telephone kiosks still exists, the research and data contradict the need for increasing the number of public phone boxes and kiosks. According to Ofcom, for example, the money that BT received from phone boxes went down by nearly half between 2000 and 2006. Further, Ofcom's 2016 Communications Market Report found that 93 percent of UK adults own or use a mobile phone in the UK; 71 percent of adults own a smartphone. Research in 2013 also found that only 3 percent of UK residents made a call from a public phone box in the previous month. The evidence strongly supports that the number of public telephone boxes and kiosks should be reduced, not increased.

Metropolitan Police – Designing Out Crime Officer objects on the following grounds:

- Telephone kiosks are no longer used for their original purpose due to the fact that nearly every person is in possession of some kind of mobile device thus negating the need to use fixed land line telephones. As a result of this the phone boxes in The London Borough of Camden have now become 'crime generators' and a focal point for anti-social behaviour (ASB).
- My own previous experience of policing Camden highlights the above ASB, ranging from witnessing the taking of Class A drugs, urination, littering, the placing of 'Prostitute Cards', graffiti, sexual activities and a fixed location for begging. All of which have occurred within the current telephone kiosks. Also, due to poor maintenance any that are damaged or are dirty do not get cleaned, which makes the telephone kiosk unusable and an eye sore. Following the 'Broken Window' theory, if a location looks and feels that it is uncared for and in a state of disrepair then this leads to other criminal activity occurring within that location.
- The introduction of the telephone kiosk will only increase the above ASB, as it conceals the activities of what is occurring inside the actual space and prevents police or passers-by seeing what or who is in/near there. This generates for the latter a fear of crime especially in regards to begging. As they will use the phone box as a cover and as a back rest when they sit on the floor, when the footpath is reduced in width even more by their presence pedestrians have to walk past closely and therefore this generates an uncomfortable feeling for them.
- The extra lighting produced by the kiosk and the space it uses up in the public realm will also create an added distraction to an already cluttered street space. Any CCTV monitoring the area will be effected by this and therefore any crime prevention/detection properties they produce is lost.
- Recent media reports have highlighted the increase in planning applications submitted to local planners for the construction of telephone kiosks. These were proven to have very little or no benefit to the local community especially in regards to the facilities that they are alleged to supply. The main reason busy locations with a high pedestrian and vehicle activity is chosen so that the telephone kiosk can be used as advertising space.

Metropolitan Police (Ward Sergeant for Holborn & Covent Garden, Bloomsbury and Camden Sector Team) objects on the following grounds:

- To be clear, my stance on phone boxes, new and old is the same, they are a magnet for drug dealing, drug taking, anti-social behaviour, prostitute carding and urinating to name a few.
- 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.
- I have many phone boxes across my wards on Tottenham Court Road, Seven Dials and Cambridge Circus that attract so many drug users and dealers, that I am bombarded by residents and businesses

alike, demanding that I take action against the boxes in general and the crime associated with it. BT's response: categorically WILL NOT remove the boxes as in their words they create too much revenue for the company. Essentially, once they are in, you will never get rid of them!

- I will go on tackling crime on my wards as that is my job. All I am asking the council for is to not put more of these crime generators into these wards that already suffer from drug misuse.

Transport Strategy (in conjunction with the Council Highways Team) object as follows:

- The site is located near Tottenham Court Road Underground Station 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 within a narrow strip of defined street furniture zone on the footway, adjacent to the kerb. However, this street furniture zone consists mainly of mature trees. The telephone kiosk would be out of place in this streetscape.
- 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. It would obstruct inter-visibility between vehicular traffic and pedestrians wishing to cross the road at this location. 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.
- The telephone kiosk would obstruct and impede kerbside activity such as deliveries, taxi pick-ups and drop-offs, refuse and recycling collections, and other servicing.
- 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 Council's Access Officer comments as follows:

There are a number of requirements for an accessible phone booth that need to be considered. These are all taken from the BS8300-1:2018 and BS-2:2018:

- whether this location obstructs the view of traffic for wheelchair users using the crossing close by;
- assistive technology requirements, such as, volume control and inductive couplers, and an indication of their presence;
- a kneehole should be provided at least 500mm deep and 700mm high to allow ease of access for wheelchair users;
- telephone controls should be located between 750mm and 1000mm above the floor level. To benefit people who are blind or partially sighted, telephones should be selected which have well-lit keypads, large embossed or raised numbers that contrast visually with their background, and a raised dot on the number 5;

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| | <ul style="list-style-type: none"> • large easy to read typeface; • fold down seat (450-520mm high) or a perch seat (650-800mm high) for the convenience of people with ambulant mobility impairments. |
| <p>Ward Councillors comments:</p> | <p><u>Councillors Harrison, Francis and Madlani (Bloomsbury Ward)</u> have objected on the following grounds:</p> <ul style="list-style-type: none"> • Street environment: use of space – great pressure already on existing space. The arrival of major transport infrastructure developments such as Crossrail and HS2, mean any new kiosk will cause significant detriment to the local authority’s ability to effectively manage the streets, hindering the achievement of the very valid public aims of keeping the street clear, moving and uncluttered. • Virtually zero public benefit of more pay phones in the era of the smartphone, and in an area already with a preponderance of phoneboxes, this is additional clutter. • Street environment: cleanliness – attract litter and mess. Not maintained or cleaned. • Crime and antisocial behaviour – on-street venues for crime and anti-social behaviour to the detriment to residents amenity and a burden on Camden’s resources. |

Site Description

The application site comprises of an area of the footway adjacent to 121 Shaftesbury Avenue on the north-western side. The pavement here is approximately 3.7m in width. This is a busy road for both vehicular and pedestrian traffic. Existing along the pavement in close proximity are: trees, street signage, and A-boards.

This site sits immediately adjacent to the Seven Dials (Covent Garden) Conservation Area and within the Central London Area. The site is not located adjacent to any listed buildings.

Relevant History

Site history:

2017/1017/P - Installation of 1 x telephone box on the pavement. Prior Approval refused 07/04/2017

2017/1194/P - Installation of 1 x telephone box on the pavement. Prior Approval refused 07/04/2017

Neighbouring sites:

Land Adjacent to 167 - 169 Shaftesbury Avenue

2018/0327/P - Installation of 1 x telephone kiosk on the pavement. Prior Approval under consideration

Land Adjacent to 167 - 169 Shaftesbury Avenue

2017/1028/P - Installation of 1 x telephone box on the pavement. Prior Approval refused 07/04/2017

Outside 167 - 169 Shaftesbury Avenue

2005/0667/P - Replacement of existing telephone kiosk with a combined ATM/Payphone. Full Planning Permission refused 13/04/2005

Outside 167 - 169 Shaftesbury Avenue

PS9904460 – The siting of two new telephone kiosks on public highway. Prior Approval approved (in default) 09/06/1999

Outside 164 Shaftesbury Avenue

PS9604018 – Upgrade existing telephone kiosks. Prior Approval approved (in default) 02/12/1996

Relevant policies

National Planning Policy Framework (2012)

London Plan 2016

Draft New London Plan 2017

TfL's Pedestrian Comfort Guidance for London (2010)

Camden Local Plan 2017

A1 Managing the impact of development

C5 Safety and Security

C6 Access

D1 Design

D2 Heritage

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance

CPG1 Design (2015) - Section 9 Designing safer environments

CPG7 Transport (2011) - Section 8 Streets and public spaces

Camden Streetscape Design Manual

Seven Dials (Covent Garden) Conservation Area Statement (adopted February 2011)

Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

Assessment

1.0 Proposal

- 1.1 Confirmation is sought as to whether the installation of a telephone kiosk would require prior approval under Part 16 of Schedule 2 of the GPDO. The order permits the Council to only consider matters of siting, design and appearance in determining GPDO prior approval applications. The potential impact on crime and public safety are relevant considerations under siting, design, appearance and access.
- 1.2 The kiosk would measure 1.32m by 1.12m with an overall height of 2.6m, and would be located on the north-western pedestrian footway along Shaftesbury Avenue, and approximately 5m away from the boundary with the Seven Dials (Covent Garden) Conservation Area.
- 1.3 It would have a powder coated steel frame with toughened glass on three sides, and a solar panel on the roof.

2.0 Assessment

- 2.1 Policy A1 states that the Council will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities, and that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. Paragraph 6.10 states that the Council will expect works affecting the highway network to consider highway safety, with a focus on vulnerable road users, including the provision of adequate sightlines for vehicles, and that development should address the needs of vulnerable or disabled users. Furthermore, Policy T1 point e) states that the Council will seek to ensure that developments provide high quality footpaths and pavements that are wide enough for the number of people expected to use them, including features to assist vulnerable road users where appropriate, and paragraph 8.9 of CPG7 (Transport) highlights that footways should be wide enough for two people using wheelchairs, or prams, to pass each other.
- 2.2 Camden's Streetscape Design manual – section 3.01 footway width states the following:
- “Clear footway” is not the distance from kerb to boundary wall, but the unobstructed pathway width within the footway;
 - 1.8 metres – minimum width needed for two adults passing;
 - 3 metres – minimum width for busy pedestrian street though greater widths are usually required;
 - Keeping the footway width visually free of street furniture is also important, allowing clear sightlines along the street’.
- 2.3 All development affecting footways in Camden is also expected to comply with Appendix B of Transport for London's (TfL's) Pedestrian Comfort Guidance, which notes that active and high flow locations must provide a minimum 2.2m and 3.3m of 'clear footway width' (respectively) for the safe and comfortable movement of pedestrians.
- 2.4 Policy T1 states that the Council will promote sustainable transport choices by prioritising walking, cycling and public transport use and that development should ensure that sustainable transport will be the primary means of travel to and from the site. Policy T1 points a) and b) state that in order to promote walking in the borough and improve the pedestrian environment, the Council will seek to ensure that developments improve the pedestrian environment by supporting high quality improvement works, and make improvements to the pedestrian environment including the

provision of high quality safe road crossings where needed, seating, signage and landscaping.

2.5 Policy T1 (Public Transport) states that where appropriate, development will be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

2.6 Paragraph 8.6 of CPG7 (Transport) seeks improvements to streets and spaces to ensure good quality access and circulation arrangements for all. Ensuring the following:

- Safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments and other disabilities;
- Maximising pedestrian accessibility and minimising journey times;
- Providing stretches of continuous public footways without public highway crossings;
- Linking to, maintaining, extending and improving the network pedestrian pathways;
- Providing a high quality environment in terms of appearance, design and construction, paying attention to Conservation Areas;
- Use of paving surfaces which enhance ease of movement for vulnerable road users; and,
- Avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed e.g. by pavement parking or by street furniture.

2.7 Policy C5 requires development to contribute to community safety and security, and paragraph 4.89 of Policy C5 states that the design of streets needs to be accessible, safe and uncluttered, with careful consideration given to the design and location of any street furniture or equipment. Paragraphs 9.26 and 9.27 of CPG1 (Design) advise that the proposed placement of a new phone kiosk needs to be considered to ensure that it has a limited impact on the sightlines of the footway, and that the size of the kiosk should be minimised to limit its impact on the streetscene and to decrease opportunities for crime and anti-social behaviour.

3.0 Siting

3.1 The application site is located on a pavement measuring approximately 3.7m wide. This area of the footway consistently experiences constant high pedestrian flows due to its busy commercial and office town centre location, and position as an active thoroughfare between Cambridge Circus and Princes Circus, not to mention its close proximity to numerous theatres, cinemas and restaurants. The proposed telephone kiosk would be positioned in front of ground floor entrances to a number of retail and restaurant units, and close to the nearby Odeon Cinema.

3.2 Section 3.01 of Camden's Streetscape Design Manual requires a minimum unobstructed pathway width within the footway, known as the 'clear footway'. This guidance and Appendix B of TfL's Pedestrian Comfort Guidance, outlines the recommended minimum footway widths for different levels of pedestrian flows.

3.3 The footprint of the proposed telephone kiosk measures 1.32m by 1.12m. Detailed design drawings that include the orientation and exact proposed positioning of the new telephone kiosk on the pavement including any forecourt distances have not been submitted, and so it is unclear as to exactly how wide the 'clear footway' width would be either side of the kiosk. However, Camden's Streetscape Design Manual section 4.01, together with TfL's Pedestrian Comfort Guidance, states that street furniture should be placed a minimum of 0.45m back from the carriageway, therefore the proposal would result in the loss of a minimum of approximately 1.8m of the footway, so reducing the 'clear footway' below the recommended minimum threshold, which is of serious concern in an area which experiences such heavy footfall.

3.4 This pedestrian pathway is particularly narrow, especially with trees lined all along this stretch of public highway. Given that greater pathway widths are usually required in active and high pedestrian flow areas like this location and in the absence of specific information in relation to the proposed position of the kiosk itself, it is considered that pedestrian comfort would be significantly reduced, resulting in overcrowding, issues of highway safety through interfering with signals, visual

obstructions, visibility splays and possibly leading to the discouragement of sustainable travel. As such, the proposal would be contrary to Policies A1 and T1 and is considered unacceptable.

3.5 The telephone kiosk would be located within a narrow strip of defined street furniture zone on the footway, adjacent to the kerb; this zone consisting mainly of mature trees. The telephone kiosk would be out of place in this streetscape. Shaftesbury Avenue is located within a zone identified as being part of the West End Project to be implemented by the Council. One of the Project's objectives is to remove redundant items of street furniture including outdated telephone kiosks to provide additional footway space for pedestrians. Therefore, the proposed introduction of a new telephone kiosk would be at odds with the aims of the West End Project and there is no justification for its siting. This would also be contrary to the guidance of the National Planning Policy Framework (NPPF) which aims to keep telecommunication sites to a minimum and encourage applicants to explore shared facilities. In addition to concerns about the infrequent use of telephone kiosks due to the prevalence of mobile phone use, it is considered that the proposed telephone kiosk would act only as a hindrance to pedestrian movement, adding further clutter to the streetscene rather than providing a public service for the benefit of highways users, contrary to Policy A1.

3.6 The applicant states there is a need for children to have access to public phone boxes in order to make free calls to Childline. However, there are 3 existing telephone kiosks within 55m of the site, located across the road outside 164 Shaftesbury Avenue to the north-east and adjacent to 144 Shaftesbury Avenue to the south-east. As such, the applicant's reasoning is not considered to be sufficient justification for the installation of a further telephone kiosk.

3.7 The proposed telephone kiosk would be located immediately adjacent to the busy Shaftesbury Avenue which is characterised by a constant and significant flow of pedestrian and vehicular traffic, including taxis, buses and cyclists, typical of this active West End and Theatreland environment. Unnecessary and dysfunctional street clutter at any location in the footway on the strategic road network (SRN) has an adverse impact on the movement of pedestrians and road users alike. The telephone kiosk would likely obstruct and impede pedestrian movement (especially for blind and partially sighted pedestrians) and visibility on and along the footway, as well as, inhibit kerbside activity such as deliveries, taxi pick-ups and drop-offs, refuse and recycling collections, and other servicing. As such, the introduction of a kiosk is considered to have significant pedestrian and road safety implications in this location contrary to Policies A1 and T1.

4.0 Design and Appearance

4.1 Policy D1 aims to ensure the highest design standards for developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, its contribution to the public realm, and its impact on wider views and vistas. Policy D2 states that the Council will *"not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area."*

4.2 The Seven Dials (Covent Garden) Conservation Area Statement (guideline SD36) advises *"it is important that the need to preserve and enhance the historic character of the Conservation Area is recognised in the design and siting of all street furniture, including statutory undertakers and other services equipment and paving materials. The Council will make efforts to avoid any unnecessary visual clutter whilst seeking design solutions appropriate for the area"*

4.3 It is considered that the introduction of a new telephone kiosk to this relatively clear, narrow section of footway in Shaftesbury Avenue would severely degrade the visual amenity of the area through the creation of unnecessary street clutter, especially as the position would be within close proximity of Seven Dials (Covent Garden) Conservation Area. These concerns are shared by local groups, Bloomsbury Resident Action Group and Covent Garden Community Association, as well as, some local residents, who all raised concerns about the design of the kiosk, the potential impact of advertising, the impact on street clutter, and its harm to the character, appearance and setting of

the adjacent conservation area.

- 4.4 Furthermore, the site sits within a zone subject to major public realm renewal as part of the Council's West End Project, approved by Camden Council Cabinet on 21/01/2015. There is no evidence in the application submission that consideration has been given to integrating the Council's highway, urban realm and landscape objectives and plans as part of the West End Project into the proposals. In particular, the proposal to add more street furniture in the form of a telephone kiosk is contrary to the objectives of the Project which seeks to declutter the area, and as such, should be resisted.
- 4.5 The proposed structure is considered to be a very poor design in terms of size, scale, massing and proposed materials, and is not an appropriate or acceptable addition in this location. It would be an obtrusive piece of street furniture in this location detracting from the streetscene. The powder coated steel frame and toughened glass incongruous design would provide an intrusive addition to the street. Consequently, the proposed kiosk would seriously affect the character, appearance and setting of the adjacent Seven Dials (Covent Garden) Conservation Area and would thus result in a significant harm to the wider streetscene. As such, the proposal would fail to adhere to Policies D1 and D2.
- 4.6 The National Planning Policy Framework (The Framework) says that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance. In this case there would be harm but it is considered that this would be less than substantial harm. In these circumstances the harm should be weighed against the public benefits of the proposals. As there are already 3 existing telephone kiosks within close proximity of the site, there is considered to be no public benefit from the provision of another kiosk in this location.
- 4.7 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Seven Dials (Covent Garden) Conservation Area, under s.72 of the Planning (Listed Buildings and Conservation Area) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

Access

- 4.8 Policy C6 requires new buildings, spaces and facilities that the public may use to be fully accessible to promote equality of opportunity. Although the proposed kiosk would allow for wheelchair users to 'access' the kiosk, this does not amount to the provision of a wheelchair accessible phone. The Council's Access Officer has highlighted that there are a number of requirements which need to be considered for an accessible phone booth, including the height of the telephone controls, which should be located between 0.75m and 1.0m above the floor. The telephone controls in the proposed kiosk would be located at a maximum height of 1.2m above the floor, and so the proposed kiosk is considered unacceptable in terms of providing access for all, contrary to Policy C6.

5.0 Anti-social behaviour

- 5.1 With regards to community safety matters, a number of issues have been raised by both the Metropolitan Police Crime Prevention Design Advisor and the Ward Sergeant for Holborn and Covent Garden in which this site is located. In particular it has been noted that existing telephone kiosks within the London Borough of Camden have become 'crime generators' and a focal point for anti-social behaviour (ASB).
- 5.2 It is therefore considered that the design and siting of the proposal on this busy footway would introduce additional street clutter, as well as, increase opportunities for crime within a location where there are already safety issues in terms of crime and ASB, through reducing sight lines and natural surveillance in the area, and providing a potential opportunity for an offender to loiter. The proposal would therefore be contrary to Policy C5 and CPG1 (Design).

6.0 Conclusion

6.1 The proposal would result in unacceptable street clutter, harmful to the character, appearance and setting of the adjacent Seven Dials (Covent Garden) Conservation Area and streetscape, and to the detriment of pedestrian flows, as well as, creating issues with safety and poor accessibility. The proposal, by virtue of its siting and appearance, is considered unacceptable.

7.0 Recommendation

7.1 Refuse Prior Approval