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**From:** [REDACTED]  
**Sent:** 10 December 2018 10:23  
**To:** Meynell, Charlotte  
**Subject:** Re 2018/5563/P - Pavement outside 1 Haverstock Hill - Telephone kiosk application  
**Attachments:** Euston Rd, 297 (Footway), 2018-10-08, Appeal Dismissed.pdf; Appeal Decisions for Euston Road (Kiosks).pdf

Hi Charlotte

I have reviewed this most recent application and wish to make some transport observations.

The site is located on Haverstock Hill (A502) which forms part of the strategic road network in the borough. Camden is the highway authority for Haverstock Hill. The site is located directly adjacent to Chalk Farm underground station, within 20 metres of a bus stop, in close proximity to Haverstock School, and at the gateway to one of our town centres (Chalk Farm).

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 0.219 metres (0.29 sqm). The footprint of the proposed telephone kiosk is broadly similar to that of the new BT replacement kiosks. However, 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 footway on the west side of Haverstock Hill is characterised by a slender street furniture zone at the kerbside. This consists of lamp columns and cycle parking stands installed parallel to the kerb. The only exception to this is the existing telephone kiosk directly to the south of the proposed site. This constitutes a pinch point on an otherwise uncluttered footway and obstructs sightlines along the footway, including views to and from the bus shelter to the north of the site. However, the owner of the existing kiosk has agreed to remove it as part of their consent for a new BT InLink unit which has now been installed approximately 63 metres to the northeast (planning reference 2017/2706/P). The kerbside street furniture zone has been sensitively designed to provide a clear and uncluttered environment sufficient to accommodate high volumes of pedestrians walking on the footway during busy periods adjacent to an underground station, near a bus stop, and in close proximity to a school and at a gateway to one of our town centres (e.g. morning, lunchtime and afternoon/evening peak periods).

A mature tree is located in the footway directly north of the proposed site. The street scene is somewhat similar to that adjacent to 297 Euston Road. It is worth referring to the recent appeal decision (planning reference 2017/5183/A) to provide advertising at an existing telephone kiosk at that location. The Planning Inspector notes at paragraph 5:

- Due to its bulk and siting, the kiosk erodes the existing openness beyond the row of trees, and due to its depth and width, it disrupts the largely unrestricted routes of pavement users by the row of trees.

The proposal to site an additional telephone kiosk 1 Haverstock Hill would also erode the existing openness of the street scene. It would also obstruct pedestrian desire line. The proposal should be refused on the same grounds.

The aforementioned BT InLink unit provides many public benefits when compared with the proposed telephone kiosk. This includes free calls, free wifi and internet access and free charging facilities for mobile phones and tablets. An additional benefit of the consent included the removal of the existing telephone kiosks at the proposed site and on Adelaide Road (adjacent/opposite Chalk Farm underground station respectively). I was supportive of the proposal as the public benefits are wide ranging and in my opinion outweigh any harm.

The proposal to install a new telephone kiosk would undo the good work done by officers to improve the footway through the removal of the pinch point for pedestrians. Indeed, it would be even more harmful due to the proposed telephone kiosk being significantly wider than the existing (standard) kiosk. It is worth noting that there are at least 3 telephone kiosks located within 80 metres of the site. This includes the aforementioned BT InLink unit and 2 kiosks around the

corner on Adelaide Road (opposite the entrance to Chalk Farm underground station). The proposal is therefore deemed to constitute unnecessary street clutter.

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 3.7 metres wide. I measured this width on site as being 3.43 metres. The proposed offset from the kerb of 0.45 metres would be acceptable. The plan also indicates that the resulting effective footway width would be reduced to 1.8 metres. However, I estimate this to be 1.66 metres. It is contrary to the aforementioned guidance and is considered to be insufficient for a footway with high pedestrian flows. This is far too narrow for a site adjacent to an underground station, near a bus stop, and in close proximity to a school and at a gateway to one of our town centres.

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) is worthy of reference. This decision is within the attached report. Paragraph 15 is 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. 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. Reference has been made 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). These decisions are within the attached report. 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 proposed telephone kiosk would be significantly wider than the established street furniture zone in the general vicinity of the site (bearing in mind that the existing kiosk is to be removed). 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.

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.

Regards

[Redacted]

[Redacted]

Principal Transport Planner

[Redacted]



[Redacted]

**Sent:** 06 March 2018 16:31

**To:** Meynell, Charlotte <[Charlotte.Meynell@camden.gov.uk](mailto:Charlotte.Meynell@camden.gov.uk)>

**Subject:** Re 2018/0334/P - Pavement outside 1 Haverstock Hill - Telephone kiosk application

Hi Charlotte

I have completed my assessment of the above application.

The site is located on a busy pedestrian route directly adjacent to Chalk Farm Underground Station. 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 directly adjacent to an existing telephone kiosk which already constitutes an obstruction to pedestrian movement. However, it should be noted that the existing telephone kiosk is to be removed by BT via planning reference 2017/2706/P (if it has not been removed already). This will be beneficial to pedestrians as it will remove a physical and visual obstruction on a relatively narrow section of footway. The introduction of a new telephone kiosk would undo the good work achieved by removing the existing telephone kiosk. Please note that the decision notice for 2017/2706/P included the following statement under informative 1:


- As there are no existing BT phone kiosks near the site, it is proposed that a kiosk on Adelaide Road opposite Chalk Farm Road and one adjacent to the station on Haverstock Hill is removed. The latter kiosk is particularly obstructive to pedestrian flow as it is on a particularly narrow stretch of pavement. Its removal would therefore substantially benefit the pedestrian environment.

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

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

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