

From: Cardno, Steve

Sent: 10 December 2018 10:22

To: Meynell, Charlotte

Subject: Re 2018/5557/P - Pavement outside 100-110 Euston Road - Telephone kiosk application

Hi Charlotte

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

The site is located on Euston Road (A501) which forms part of the Strategic Road Network (SRN). It is one of the busiest traffic (including pedestrians) corridors in the borough. Pedestrian footfall is particularly high with numerous commercial properties and 3 mainline railway stations on the northern side (Euston, Kings Cross and St Pancras). Underground stations are also located at each mainline railway station, Euston Square and Warren Street. A high number of bus services serve bus stops along both sides of Euston Road. Transport for London (TfL) is the highway authority for Euston Road as it is located on the Transport for London Road Network (TLRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.

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 north side of Euston Road at the above site is characterised by a complete lack of bulky street furniture adjacent to the kerbside. A slender street furniture zone consisting of lamp columns, cycle parking stands, signal posts, a Legible London wayfinding sign and electrical feeder pillars 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).

A row of 4 mature trees is located towards the rear of the footway. These help to soften the landscape and define the street. Unfortunately, the street scene has been spoiled by the installation of 3 telephone kiosks at this location. The proposal to install a further telephone kiosk would only worsen the situation through the introduction of unnecessary street clutter in an already cluttered pedestrian environment. The proposal would therefore have an unacceptable impact on the street scene. 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 outside 100-110 Euston Road would also erode the existing openness of the street scene. It would also obstruct pedestrian desire lines between Euston Road and Chalton Street. The proposal should be refused 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 4.1 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 3 mainline railway and underground stations. Pedestrian footfall is exceptionally high at this location and this is predicted to increase significantly with ongoing economic growth in Central London and High Speed Two (HS2) currently under construction.

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.

The proposed plan indicates that the kiosk would be offset from the adjacent property by 1.3 metres. This is considered to be insufficient and would constitute an obstruction to pavement cleaning and building maintenance activities. The proposal should be refused on this basis.

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 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

Steve

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