

3074/08E-1903PO01

20 March 2019



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Dear Sirs

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)  
GENERAL PERMITTED DEVELOPMENT ORDER 2015 (AS  
AMENDED)  
APPEAL AGAINST REFUSAL OF PRIOR APPROVAL FOR A  
PUBLIC CALL BOX  
ON BEHALF OF MAXIMUS NETWORKS LTD**

On behalf of our client, Maximus Networks Ltd, please find enclosed all necessary documentation for an Appeal lodged in respect of refusal to grant Prior Approval by London Borough of Camden for installation of a public call box.

This submission comprises the following documentation:-

1. This Covering Letter;
2. Completed Appeal Forms;
3. Appeal Statement including Supporting Documents:
  - Appendix 1** - Original Application comprising:-
    - Covering Letter
    - Application Forms
    - Site Location Plan at 1:1250
    - Site Location Plan at 1:200 including Dimensions
    - A4 Scheme Drawing
    - A3 Drawing MAX 2 Assembly
    - Developers Notices dated 27<sup>th</sup> July 2018
  - Appendix 2** - Decision Notice (& Delegated Report *if issued*)
  - Appendix 3** - Code Operator Ofcom License
  - Appendix 4** - 5<sup>th</sup> Feb 19 WCC Judgement (New World Payphones) & Counsel's Opinion

**Appendix 5** - Relevant Judgements and Appeal Decisions

**Appendix 6** - Site Specific Policies

**Appendix 7** - TFL Pedestrian Comfort and Streetscape  
Guidance

**Appendix 8** - Site Specific Highways Analysis

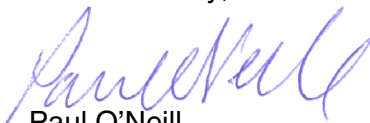
#### 4. Draft Statement of Common Ground.

A copy of the Developer's Notice served on the relevant Highway Authority as landowner is submitted. The notice was served on London Borough of Camden and on TFL (where applicable) on 27<sup>th</sup> July 2018.

The Appellant requests as per discussions with PINS that the Appeal is heard by the Informal Hearing procedure. This appeal is part of a large number of submissions for prior approval that have been submitted to enable the applicant to provide a new telecommunications network. Having sought the advice of Leading Counsel, and applying the Inspectorate's procedural guidance (Annex K), the need to make legal submissions and the need to ensure all the relevant main issues about the correct approach to take, both put the appeals firmly within the category of appeals which would most appropriately be dealt with in a hearing and provide the best opportunity to deal with the large number of appeals submitted in the most efficient way possible.

We can also confirm that a copy of the Appeal Forms, Notice and all supporting documentation have been sent to the Local Planning Authority.

Yours faithfully,



Paul O'Neill  
Director

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