GENERAL INFORMATION						A - PRIMARY TEST								B - SECONDARY TEST		C - TERTIARY TEST		D - REASONS FOR REFUSAL		
Ref	Borough	Street	Post Code	1:1250 Plan	Dimensioned 1:200 Plan	Character Area	Overall Footway Width (m)	Two- Way Pedestrian Flow (Pedestrians per hour) A=Actual[1] Flow E=Estimated Flow[2]	Flow Category (Appendix B, Pedestrian Comfort Guidance, 2010)			Automatic Compliance with TfL Guidence (>5.3m) (Yes/No) * *note - If no move to next column*	Compliance with TfL Guidence In Relation to Flow Catorgory (Yes/No) * *note - If no move to next column*	Minimum Clear Footway Width>2m	Minimum Clear Footway Width>1m	Evidence on-site to demonstrate no worsening (iro effective footway width)	See Photograph OR Street View for details	No Highway Grounds (No further evidence required)	Generic Highway Grounds (Either "tick" or "see site specific evidence")	Site Specific Highway Grounds ("See site specific evidence")
									Low Flow (<600pph)	Active Flow (600 to 1200pph)	High Flow (>1200pph)									
2018/5578/P	Camden	190 High Holborn	WC1V 7BH	Yes	Yes	HIgh Street	4.7	1704E			YES	NO	NO	NO	SEE PHOTO BELOW	YES	SEE PHOTO BELOW		✓	

A - PRIMARY TEST - TfL PEDESTRIAN COMFORT GUIDANCE, 2010

1) The total width of the footway at the site is 4.7m.

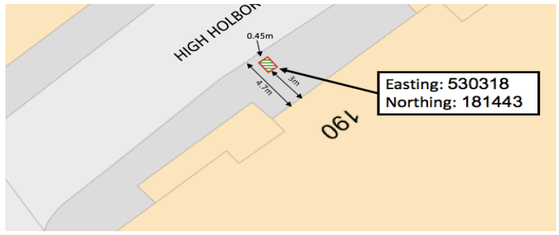
2) Pedestrian surveys indicate that the site experiences high levels of pedestrian flows over 1200 pedestrians per hour (pph) according to the above TfL Pedestrian Comfort guidance.

3) The level of pedestrian flow at the site (1704pph) indicates that the recommended overall footway width should be 5.3m (total width) . The existing footway width falls below this level and therefore does not comply with the Primary Test relating to the TfL Pedestrian Comfort guidance.

B - SECONDARY TEST - MINIMUM FOOTWAY CLEAR ZONE (TfL STREETSCAPE GUIDANCE, 2017)

1) There is a footway clear zone of 3m at the proposed location taking account of the proposed furniture zone (1.32m for the telephone kiosk with a 0.45m setback from the edge of the kerb).

2) The preferred minimum unobstructed width of a footway is 2m. However the above guidance recommends this can be reduced to an absolute minimum of 1m where there is an obstacle along a length of not more than 6m. The site will provide a footway clear zone of at least 3Pm in accordance with this guidance.



D - REASONS FOR REFUSAL AND RESPONSE TO REFUSAL

Refusal Description:

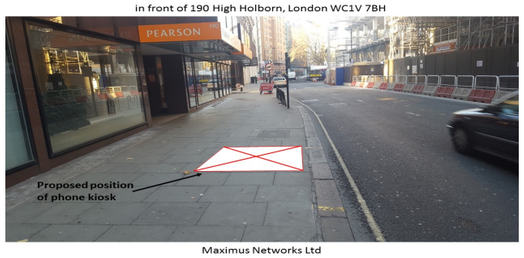
"1 The proposed telephone kiosk, by reason of its location, size and detailed design, would add to visual clutter and detract from the character and appearance of the street scene, contrary to policy D1 (Design) of the London Borough of Camden Local Plan 2017.

2 The proposed telephone kiosk, by virtue of its location, size and detailed design, and adding unnecessary street clutter, would reduce the amount of useable, unobstructed footway, which would be detrimental to the quality of the public realm, cause harm to highway safety and hinder pedestrian movement and have a detrimental impact on the promotion of walking as an alternative to motorised transport, contrary to policies G1 (Delivery and location of growth), A1 (Managing the impact of development), C6 (Access for all) and T1 (Prioritising walking, cycling and public transport) of the London Borough of Camden Local Plan 2017.

3 The proposed telephone kiosk, by virtue of its inappropriate siting, size and design, would fail to reduce opportunities for crime and antisocial behaviour to the detriment of community safety and security, and compromise the safety of those using and servicing the telephone kiosk contrary to policy C5 (Safety and Security) of the London Borough of Camden Local Plan 2017.

4 The proposed telephone kiosk, by reason of its design, would not be accessible to wheelchair users, failing to promote fair access or meet sufficient standard of design contrary to policy C6 (Access for all) of the London Borough of Camden Local Plan 2017."

in front of 190 High Holborn, London WC1V 7BH



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C - TERTIARY TEST - EVIDENCE TO SHOW NO WORSENING

1) There is on-site evidence (see photo below) showing worsening of the footway clear zone if the proposed telephone kiosk was erected at this site location.

2) There is no existing street furniture in the vicinity of the proposed location.

CONCLUSION:

Given the evidence put forward in this appeal statement, it is not considered that the addition of the proposed telephone kiosk to the existing street furniture in the vicinity would create street clutter causing material harm, and demonstrates integration from a highway function perspective. The proposals would not result in any material impact on the capacity of this section of footway nor compromise safety.

Based on the information provided, it is considered that the proposed telephone kiosk should be approved on highway grounds.

NOTES
1: Actual flow respresents the pedestrian flow taken at the site
2: Estimated flow respresents the pedestrian flow taken in the borough based on the character of the area