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**From:** [REDACTED]  
**Sent:** 18 September 2019 16:55  
**To:** Planning  
**Subject:** SC logged/trim - 19/09/2019 - 2019/4064/P; Kilburn High Road, 158-162; CMDN/19/274

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

FAO Josh Lawlor

**TfL Spatial Planning Reference:** CMDN/19/274  
**Borough Reference:** 2019/4064/P  
**Location:** Telephone Kiosk outside 158-162 Kilburn High Road  
**Proposal:** Installation of 1x replacement telephone kiosk

Many thanks for consulting TfL, with regard to the above application, TfL has the following comments:

1. The proposed development is located on the A5 (Kilburn High Road), which forms part of the Strategic Road Network (SRN). TfL have a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN.
2. The draft London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. It is expected that all planning decisions within London should follow London Plan policies. As such, TfL will be expecting all new planning applications to be compliant with the policies as set out in within the new draft London Plan.
3. Policy T2 of the draft London Plan sets out London's Healthy Streets approach. The Healthy Streets approach uses 10 indicators, based on evidence of what is needed to create a healthy, inclusive environment in which people choose to walk, cycle and use public transport.
4. For this application two different site plans have been uploaded, proposing two different locations for the new telephone kiosk. TfL requests that the exact proposed location of this telephone kiosk is provided before determination by the council. TfL cannot sufficiently scrutinise this application until clarity on this matter is provided.
5. TfL reminds the applicant and Council that the current London Plan Policy 6.10 (Walking) refers to 'promoting simplified streetscape, decluttering and access for all' and also states that Planning Decisions 'should ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space'.
6. Decluttering the streetscape is also prioritised in TfL Streetscape Guidance (available from <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>). TfL expects the standards and principles in this document to be applied to all phone box replacement applications by the council.

7. The width of Kilburn High Road footway must not be reduced or blocked and must maintain clear, unobstructed passage for pedestrians and cyclists at anytime. The street width must not fall below 3.3 metres, the minimum street width requirement for active streets such as this part of Kilburn high Road. This requirement is based on safety and amenity grounds and is set out in TfL's Pedestrian Comfort Guidance for London Document (available from: <http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>).
8. The applicant should note that the private forecourt of Aldi does not count towards the effective footway width of Kilburn high road. Taking account for this, the street width after installation would fall significantly below the 3.3 metre requirement for active streets such as this part of Kilburn High Road, outside a busy supermarket.
9. TfL note there are changes to the kerb line proposed within the proposal drawings. TfL require clarification on whether this has been agreed by the council as Highway Authority as well as TfL as under the Traffic Management Act 2004.

**In general TfL would not support kerb Line changes which do not improve the highway for the benefit of pedestrians, cyclists and bus users in line with TfL Vision Zero and Healthy Streets approaches.**

If the kerb change position to move further out into the road, the new telephone kiosk proposed on Site Plan rev C will be in the middle of the footway, outside any furniture zone and obstructing pedestrian movement. Blockages on the footway will result in a less effective navigation of the pedestrian footway and may result in some pedestrians diverting onto the carriageway which will be a highway safety issue.

Kilburn High road is part of a Future Cycle Route and therefore proposals to alter the kerb line would potentially compromise the council and TfL's future cycle route proposals.

**Overall, for the reasons outlined above TfL object to this proposal.**

If you have any questions regarding this response please do not hesitate to contact me.

Many thanks

[Redacted]

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