

Delegated Report		Analysis sheet		Expiry Date:	28/12/2018
		N/A		Consultation Expiry Date:	15/12/2018
Officer			Application Number(s)		
Ben Farrant			2018/5561/P		
Application Address			Drawing Numbers		
Land Adjacent to 1 St Giles High Street London WC2H 8AG			Refer to draft decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Installation of 1 x telephone kiosk on the pavement.					
Recommendation(s):		Prior Approval Required – Approval Refused			
Application Type:		GPDO Prior Approval Determination			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	00	No. of responses	00	No. of objections	04
Summary of consultation responses:	<p>A site notice was displayed on 21/11/2018 and expired on 15/12/2018.</p> <p>4 objections were received following public consultation on the following grounds:</p> <ul style="list-style-type: none"> • No requirement for a phone kiosk in this location • Crime generator • Application is really to gain advertising space • Street clutter/safety hazard in an area with high pedestrian and vehicular flows • Situation will worsen with Crossrail • Negative impact on the setting of the Seven Dials Conservation Area <p>Covent Garden Community Association objects on the following grounds:</p> <ul style="list-style-type: none"> • Crime generator • Low demand for telephone kiosks • Disproportionate size • Likely introduction of advertising • Obstruction of a busy footway (likely to worsen with the opening of Crossrail) • Telephone boxes exist within close proximity of the site <p>Metropolitan Police – Designing Out Crime Officer objects on the following grounds:</p> <ul style="list-style-type: none"> • Telephone kiosks are no longer used for their original purpose due to the fact that nearly every person is in possession of some kind of mobile device thus negating the need to use fixed land line telephone. As a result of this the phone boxes in The London Borough of Camden have now become 'crime generators' and a focal point for anti-social behaviour (ASB). • My own previous experience of policing Camden highlights the above ASB, ranging from witnessing the taking of Class A drugs, urination, littering, the placing of 'Prostitute Cards', graffiti, sexual activities and a fixed location for begging. All of which have occurred within the current telephone kiosks. Also, due to poor maintenance any that are damaged or are dirty do not get cleaned, which makes the telephone kiosk unusable and an eye sore. Following the 'Broken Window' theory, if a location looks and feels that it is uncared for and in a state of disrepair then this leads to other criminal activity occurring within that location. • The proposed location of the device is on the footpath which currently 					

clear of any unnecessary street furniture and allows for easy passage along this area. The nearby buildings are constructed on large pillars which create an overhang protecting the pathway... therefore this location does become a location which is suitable for groups to congregate during inclement weather. Therefore the local environment is not suitable for such a device due to the problems they are known to create.

- The design of the unit itself appears to be an issue as the operating unit, chargers and handset are situated on one side. Therefore if a person is using the unit they cannot see what is going on around them nor who could be approaching them from further up the foot path. Therefore creating a fear of crime whilst being used. The solar panels positioned at an angle on top of the device will act as a shelter from inclement weather.
- The hand set unit appears to be recessed into the main unit and therefore appears from the picture graphic to create a flat surface. The London Borough of Camden well known for Class A Drugs Misuse and therefore any well-lit and smooth surface is used for the preparation of such narcotics. This recess could also be used to store small objects and conceal them if police approach a suspect drug misuser preventing them from detecting crime.
- The introduction of the unit will also increase the above ASB, as it conceals the activities of what is occurring behind the actual space and prevents police or passers-by seeing what or who is in/near there. This generates for the latter a fear of crime especially in regards to begging. As they will use the phone box as a cover and as a back rest when they sit on the floor, when the footpath is reduced in width even more by their presence pedestrians have to walk past closely and therefore this generates an uncomfortable feeling for them.
- The extra lighting produced by the kiosk and the space it uses up in the public realm will also create an added distraction to an already cluttered street space. Any CCTV monitoring the area will be effected by this and therefore any crime prevention/detection properties they produce is lost.
- Recent media reports have highlighted the increase in planning applications submitted to local planners for the construction of telephone kiosks. These were proven to have very little or no benefit to the local community especially in regards to the facilities that they are alleged to supply. The main reason busy locations with a high pedestrian and vehicle activity is chosen so that the telephone kiosk can be used as advertising space.

TfL Spatial Planning objects on the following grounds:

- TfL notes that this phone kiosk application does not appear to be contingent on removal of more than one phone kiosk in exchange for the new unit proposed, so that it would not contribute to an overall reduction of phone kiosks across Camden's public realm.

- We remind 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'. TfL Spatial Planning takes the view that the phone kiosk proposed would not contribute in any way to a high quality pedestrian environment or emphasise the quality of pedestrian and street space.
- The draft London Plan Policy D7 (Public Realm) states 'Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary and dysfunctional clutter of street furniture to ensure the function of space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused'.
- Policy T2 (Healthy Streets) of the draft London Plan states that 'Development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance.' TfL does not consider that the application will deliver any improvements which support any of the ten Healthy Streets Indicators.
- Unnecessary and dysfunctional street clutter in any location in the footway on the TLRN has an obvious adverse impact on the movement of pedestrians, which goes against TfL's statutory network management duties.

The Council's Transport Team objects on the following grounds:

- The site is located in a high footfall area in Central London near Tottenham Court Road Underground Station. Pedestrian volumes are extremely high and are forecast to increase significantly when Crossrail services become operational later (was due to be December 2018 but now forecast for Autumn 2019 at the earliest) 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.
- 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 0.55 metres (0.73 sqm). The footprint of the proposed telephone kiosk is broadly similar to that of a standard telephone kiosk and would be 3 times greater than the new BT replacement kiosks. And 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 footway on the north side of St Giles High Street at the above site is characterised by a complete lack of bulky items of street

furniture adjacent to the kerbside. There are some slender lamp columns, telecommunications cabinets and a CCTV post in the general vicinity of the site. However, these take up little footway space. This helps to promote clear and unobstructed sightlines along the edge of the pedestrian environment when looking south from the proposed site. The street furniture zone adjacent to the pedestrian route (desire line) 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). The proposal to site a telephone kiosk at the proposed site would spoil this uncluttered design by introducing a prominent feature that would look out of place and be overly dominant. The proposal would therefore have an unacceptable impact on the street scene. It would also constitute an unnecessary obstruction to pedestrians wishing to cross the road at this location.

- 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 4.6 metres wide. 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 3 metres. This is contrary to the aforementioned guidance and is considered to be insufficient for a footway with high pedestrian flows.
- The proposed telephone kiosk being located outside of the established street furniture zone, would encroach significantly into the effective footway width available for pedestrian movement (i.e. the pedestrian desire line). The proposed telephone kiosk would therefore obscure sightlines along and across 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.
- 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, colliding with each other, or indeed with the telephone kiosk.

The Council's Access Officer objects on the following grounds:

- Under the New BS8300-1:2018 and BS-2:2018 all telephone communication devices for public use should be fitted with assistive technology such as volume control and inductive couplers and there should be an indication of their presence.
- A knee-hole should be provided at least 500mm deep and 700mm high to allow ease of access for wheelchair users.

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| | <ul style="list-style-type: none">• Telephone controls should be located between 750mm and 1000mm above the floor level. To benefit people who are blind or partially sighted, telephones should be selected which have well-lit keypads, large embossed or raised numbers that contrast visually with their background, and a raised dot on the number 5.• Instructions for using the phone should be clear and displayed in a large easy to read typeface.• A fold down seat (450-520mm high) or a perch seat (650-800mm high) should be provided for the convenience of people with ambulant mobility impairments. |
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Site Description

The application site is on the pavement adjacent to 1 St Giles High Street, which is part of the recent St Giles development designed by the Italian architect Renzo Piano. The pavement is approximately 4.6m in width. It is located near Tottenham Court Road Underground Station one of the busiest pedestrian corridors in the borough. It is also within a busy road for both vehicular and pedestrian traffic. The border for the Seven Dials (Covent Garden) Conservation area is located on the opposite side of the road.

Relevant History

Site history:

2017/1200/P - Installation of 1 x telephone box on the pavement. – **Prior Approval Refused 07/04/2017.**

2018/0325/P - Installation of 1 x telephone box on the pavement. – **Prior Approval Refused 14/03/2018.**

Neighbouring sites:

None.

Recent appeals dismissed re telephone kiosks:

Appeal Decisions: APP/X5210/W/17/3202885, APP/X5210/W/17/3202779, APP/X5210/W/17/3202769, APP/X5210/W/17/3202763, APP/X5210/W/17/3202896, APP/X5210/W/17/3202786, APP/X5210/W/17/3202782, APP/X5210/W/17/3202879, APP/X5210/W/17/3203047, APP/X5210/W/17/3202794, APP/X5210/W/17/3202889, APP/X5210/W/17/3202789.

10 appeals dismissed and 2 allowed on the 19th December 2018.

Pavement outside Crowndale Centre, 218 Eversholt Road, London, NW1 1BD:

- would have some impact on pedestrian flows along this busy pedestrian route, especially at night when patrons are dispersing from late night uses in the vicinity.
- harm to the character and appearance of the CA would be localised and would, therefore, be less than substantial to the significance of the CA as a whole. the public benefits arising from the proposal, in terms of improved accessibility and security when compared to existing kiosks, do not, in this instance, outweigh the harm to the CA

Pavement outside 1A Camden High Street, London, NW1 7JE

- the proposed kiosk would appear incongruous in its setting within the largely open and uncluttered pedestrian space recently created at the southern end of Camden High Street.
- harm to the character and appearance of the CA would be localised and would, therefore, be less than substantial to the significance of the CA as a whole. the public benefits arising from the proposal, in terms of improved accessibility and security when compared to existing kiosks, do not, in this instance, outweigh the harm to the CA
- Given the extremely busy nature of the pedestrian area at the southern end of Camden High Street, the proximity of the proposed kiosk to the entrances of the Koko building, and the likely impact of the kiosk on footfall near a busy
- pedestrian crossing, it would be harmful to pedestrian safety in what is otherwise a relatively open, uncluttered area.

Pavement outside of Camden Town Underground Station, Camden High Street, London Borough of Camden

- the design of the proposed kiosk would be unsympathetic to the character and appearance of the tube station, the façade of which comprises primarily red glazed tiles with glazed arches above the entrance.

- kiosk would be detrimental to pedestrian safety at this point the bank building immediately to the south.

- the public benefits in this instance do not outweigh the harm to the CA as identified

Pavement outside of 197-199 Camden High Street, London, NW1 7BT n, NW1 8NH

- The kiosk would not be harmful to the character or appearance of the CA in this location.
- the siting of the kiosk would result in harm to pedestrian safety and convenience along this section of Camden High Street, due to heavy pedestrian flows and the additional conflict with these flows that would be created by the movement of goods and equipment along the pavement. the character or appearance of the CTCA.

Pavement outside of 186-188 Camden High Street, London, NW1 8QP

- the kiosk would fail to preserve the character and appearance of the CA. It would cause less than substantial harm to the significance of the CA, but the harmful siting of the proposal, when taken together with the resultant likely harmful impact on pedestrian flows, justifies dismissal of the appeal.

Pavement outside of 27 Chalk Farm Road, London, NW1 8AG [allowed]

- the siting and appearance of the proposed kiosk could not be said to harm the character or appearance of the nearby CA, or to the setting of the listed buildings on the opposite side of the road. Moreover, on the basis of the information available to me, it appears that the kiosk would not be likely to result in any harm to the free and safe movement of pedestrians along this section of pavement

Pavement outside of 31 Chalk Farm Road, London NW1 8AH

- the kiosk would not be harmful to the character or appearance of the CA on the opposite side of Chalk Farm Road, or with the setting of nearby listed buildings. There is a strong possibility of harm to the safety of pedestrians by virtue of its proximity to the cycle stands, outside restaurant seating, a car parking layby, and especially the mature tree.

Pavement outside of 249 Kentish Town Road, London, NW5 2JT

- Not in CA or listed buildings
- the kiosk would be harmful to the general visual amenities of the area by way of adding a degree of clutter to a location already somewhat crowded by existing street furniture. In addition it would be located very close to a pinch point on the pavement and a busy parking bay on the road, to the detriment of pedestrian and vehicular safety.

Pavement outside of 272 West End Lane, London, NW6 1LJ

- fail to result in public realm improvement in this part of the CA and would introduce an alien feature of modern design and materials into the street scene, as opposed to improving materials and reducing clutter.

Pavement outside of 319 West End Lane, London, NW6 1RN

- the proposed kiosk would be harmful to the setting of the listed Fire Station, and it would fail to result in public realm improvement in this part of the CA by way of introducing an alien feature of modern design
- and materials into the street scene, as opposed to improving materials and reducing clutter. It would therefore be harmful to the character and appearance of this part of the WEGCA. It would appear unlikely that the kiosk would be harmful to pedestrian safety, but there may be some detriment to vehicular safety caused by the proximity of the kiosk to the exit/crossover serving the fire station

Pavement opposite 152 West End Lane, (corner of Iverson Road), London, NW6 2LJ [allowed]

- the proposed kiosk, by virtue of its modern simple design, would complement the modern frontages of nearby shops, and the designs of nearby buildings. It would not be harmful to the visual amenities of
- the area and it would not prejudice pedestrian safety.

Pavement outside Unit 1, Hardy Building, West End Lane, London, NW6 1BR

- the proposed kiosk would be harmful to the character and appearance of the general area, and that its siting would be harmful to pedestrian safety

On 18th September 2018, 13 appeals were dismissed for installation of Euro Payphone kiosks along Euston Road and in King's Cross. One decision notice was issued covering all of the appeals. He

concluded that all the proposed kiosks would add to street clutter and most of them would reduce footway widths hampering pedestrian movement.

The Inspector agreed in all 13 cases with the council's concerns about the addition of street clutter whether the sites were or were not located inside a conservation area or affecting the setting of a listed building. In 11 cases he agreed that the impact on pedestrian movement was unacceptable and, when the issue was raised, that the impact on the visibility of traffic signals would also not be acceptable. He took on board the availability too of other telephone kiosks in the vicinity.

In summary, the inspector noted the following:

The only matters for consideration are the siting and appearance of the kiosk. The appellant does not have to prove a need for new telephone kiosks (para 3). The kiosks however would appear as substantial structures on the pavement. He also noticed that some of the existing kiosks of similar size in the area exhibited evidence of being used for sleeping in by homeless people. The phones in some of the kiosks also appeared not be functioning. These circumstances suggest that some of the existing kiosks are not being used for the purpose for which they were intended, which puts into question their primary purpose (para 12).

He noted that the proposed kiosks would comply with the required minimum clear footway widths next to them as set out in the Transport for London Streetscape Guidance and Pedestrian Comfort Guidance, and with Camden's Streetscape Design Manual, Design Planning Guidance (CPG1) and Transport Planning Guidance (CPG7). He notes (paras 45 and 46) however that 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 width. Paragraph 8.6 seeks to ensure, amongst other things, that street clutter is avoided and the risk of pedestrian routes being obstructed is minimised.

He concluded that all the proposed kiosks would add to street clutter and most of them would reduce footway widths hampering pedestrian movement. The GPDO establishes the principle of the need for such telephone kiosks but the benefits of providing them are inevitably related to whether there are other existing pay phones in the vicinity. If there are no existing pay phones then the benefits of new pay phones must necessarily be enhanced, even despite the widespread use of mobile phones. He highlighted the availability of other such kiosks in the locality. The sites were also adjacent or within close walking distance of three mainline railway stations (Euston, St Pancras and King's Cross) all of which contain within them a number of pay phones. The benefit of providing additional kiosks in such circumstance is therefore limited.

Relevant policies

National Planning Policy Framework (2018)

London Plan (2016)

Draft New London Plan (2017)

TfL's Pedestrian Comfort Guidance for London (2010)

Camden Local Plan (2017)

A1 Managing the impact of development

C5 Safety and Security

C6 Access

D1 Design

D2 Heritage

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance

CPG1 Design (2018) – Section 9 Designing safer environments

CPG7 Transport (2011) – Section 8 Streets and public spaces

Camden Streetscape Design Manual

Seven Dials (Covent Garden) Conservation Area Statement (adopted February 2011)

Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013

Design of an accessible and inclusive built environment. External environment - code of practice (BS8300-1:2018 and BS-2:2018)

Assessment

1.0 Proposal

- 1.1 Confirmation is sought as to whether the installation of a telephone kiosk would require prior approval under Part 16 of Schedule 2 of the GPDO. The order permits the Council to only consider matters of siting, design and appearance in determining GPDO prior approval applications. The potential impact on crime and public safety are relevant considerations under siting, design, appearance and access.
- 1.2 The proposal is for installation of a solar powered ‘totem’ telephone kiosk. The kiosk would measure 1.32m in width by 0.88m in depth with an overall height of 3.12m including its solar panel canopy (2.8m high for the main body and 0.22m in depth without the solar panel canopy), and would be located on the pedestrian footway along St Giles High Street adjacent to no. 1.
- 1.3 The rear elevation would have phone facilities (handset and keypad) on a metal backing and frame with a rear solar panel; the front elevation would have a visual area be used entirely for a LED digital advertising display screen with 4 LED strips running the full height of the kiosk totem. A solar panel canopy would be located on top of the unit.

2.0 Assessment

2.1 Policy A1 states that the Council will seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities, and that the Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. Paragraph 6.10 states that the Council will expect works affecting the highway network to consider highway safety, with a focus on vulnerable road users, including the provision of adequate sightlines for vehicles, and that development should address the needs of vulnerable or disabled users. Furthermore, Policy T1 point e) states that the Council will seek to ensure that developments provide high quality footpaths and pavements that are wide enough for the number of people expected to use them, including features to assist vulnerable road users where appropriate, and paragraph 8.9 of CPG7 (Transport) highlights that footways should be wide enough for two people using wheelchairs, or prams, to pass each other.

2.2 Camden’s Streetscape Design manual – section 3.01 footway width states the following:

- “Clear footway” is not the distance from kerb to boundary wall, but the unobstructed pathway width within the footway;
- 1.8 metres – minimum width needed for two adults passing;
- 3 metres – minimum width for busy pedestrian street though greater widths are usually required;

- Keeping the footway width visually free of street furniture is also important, allowing clear sightlines along the street’.

2.3 All development affecting footways in Camden is also expected to comply with Appendix B of Transport for London’s (TfL’s) Pedestrian Comfort Guidance, which notes that active and high flow locations must provide a minimum 2.2m and 3.3m of ‘clear footway width’ (respectively) for the safe and comfortable movement of pedestrians.

2.4 Policy T1 states that the Council will promote sustainable transport choices by prioritising walking, cycling and public transport use and that development should ensure that sustainable transport will be the primary means of travel to and from the site. Policy T1 points a) and b) state that in order to promote walking in the borough and improve the pedestrian environment, the Council will seek to ensure that developments improve the pedestrian environment by supporting high quality improvement works, and make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping.

2.5 Policy T1 (Public Transport) states that where appropriate, development will be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

2.6 Paragraph 8.6 of CPG7 (Transport) seeks improvements to streets and spaces to ensure good quality access and circulation arrangements for all. Ensuring the following:

- Safety of vulnerable road users, including children, elderly people and people with mobility difficulties, sight impairments and other disabilities;
- Maximising pedestrian accessibility and minimising journey times;
- Providing stretches of continuous public footways without public highway crossings;
- Linking to, maintaining, extending and improving the network pedestrian pathways;
- Providing a high quality environment in terms of appearance, design and construction, paying attention to Conservation Areas;
- Use of paving surfaces which enhance ease of movement for vulnerable road users; and,
- Avoiding street clutter and minimising the risk of pedestrian routes being obstructed or narrowed e.g. by pavement parking or by street furniture.

2.7 Policy C5 requires development to contribute to community safety and security, and paragraph 4.89 of Policy C5 states that the design of streets needs to be accessible, safe and uncluttered, with careful consideration given to the design and location of any street furniture or equipment. Paragraphs 9.26 and 9.27 of CPG1 (Design) advise that the proposed placement of a new phone kiosk needs to be considered to ensure that it has a limited impact on the sightlines of the footway, and that the size of the kiosk should be minimised to limit its impact on the streetscene and to decrease opportunities for crime and anti-social behaviour.

3.0 Siting

3.1 The application site is a stretch of pedestrian footpath which is approximately 4.6m wide adjacent to No. 1 St Giles High Street. Pedestrian volumes are extremely high and are forecast to increase significantly when Crossrail services become operational later this year.

3.2 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 4.6 metres wide. 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 3 metres. This is contrary to the aforementioned guidance and is considered to be insufficient for a footway with high pedestrian flows. This would reduce pedestrian comfort, resulting in overcrowding, issues with highway safety through interfering with signals, visual obstructions,

visibility splays and may lead to the discouragement of sustainable travel. As such, the proposal would be contrary to Policies A1 and T1 and is considered unacceptable.

3.3 One of the West End Project's objectives is to remove redundant items of street furniture including outdated telephone kiosks to provide additional footway space for pedestrians. Therefore, the proposed introduction of a new telephone kiosk would be at odds with the aims of the West End Project and there is no justification for its siting.

3.4 The applicant states there is a need for children to have access to public telephone kiosks in order to make free calls to Childline. However, there is an existing telephone kiosk across the road of the site. As such, the applicant's reasoning is not considered to be sufficient justification for the installation of a further telephone kiosk. In addition to concerns about the infrequent use of telephone kiosks due to the prevalence of mobile phone use, it is considered that the proposed telephone kiosk would act only as a hindrance to pedestrian movement, adding further clutter to the streetscene rather than providing a public service for the benefit of highways users, contrary to Policy A1.

4.0 Design and Appearance

4.1 Policy D1 aims to ensure the highest design standards for developments. Policy D1 states that the Council will require all developments to be of the highest standard of design and to respect the character, setting, form and scale of neighbouring buildings, its contribution to the public realm, and its impact on wider views and vistas.

4.2 The Seven Dials (Covent Garden) Conservation Area Statement (guideline SD36) advises "it is important that the need to preserve and enhance the historic character of the Conservation Area is recognised in the design and siting of all street furniture, including statutory undertakers and other services equipment and paving materials The Council will make efforts to avoid any unnecessary visual clutter whilst seeking design solutions appropriate for the area".

4.3 Due to its location and the prominence of the proposal's siting, especially as the position would be in close proximity to Seven Dials (Covent Garden) Conservation Area, it is considered that the proposed development would severely degrade the visual amenity of the area through the creation of unnecessary street clutter.

4.4 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.

4.5 Furthermore, the site sits within a zone subject to major public realm renewal as part of the Council's West End Project, approved by Camden Council Cabinet on 21/01/2015. There is no evidence in the application submission that consideration has been given to integrating the Council's highway, urban realm and landscape objectives and plans as part of the West End Project into the proposals. In particular, the proposal to add more street furniture in the form of a telephone kiosk is contrary to the objectives of the Project which seeks to declutter the area, and as such, should be resisted.

4.6 The proposed structure is considered to be a very poor design in terms of size, scale, massing and proposed materials, and is not an appropriate or acceptable addition in this location. It would be an obtrusive piece of street furniture in this location detracting from the streetscene. The incongruous design would provide an intrusive addition to the street. Consequently, the proposed kiosk would seriously affect the character, appearance and setting of the adjacent Seven Dials (Covent Garden) Conservation Area and would thus result in a significant harm to the wider streetscene. As such, the proposal would fail to adhere to Policies D1 and D2.

4.7 Special attention has been paid to the desirability of preserving or enhancing the character or appearance of the adjacent Seven Dials (Covent Garden) Conservation Area, under s.72 of the

5.0 Access

5.1 Policy C6 requires new buildings, spaces and facilities that the public may use to be fully accessible to promote equality of opportunity. Paragraph 8.6 of Camden Planning Guidance document CPG7 (Transport) 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.

5.2 Although the proposed kiosk would allow for wheelchair users to 'access' the kiosk to some degree, this does not amount to the provision of a wheelchair accessible phone. The telephone controls in the proposed kiosk would be located at a maximum height of 1.2m above the floor which would not be compliant. There are also no details of well-lit keypads, large embossed or raised numbers for the controls. No fold down or perch seat, nor kneehole provision to allow ease of access for wheelchair users would be provided. Nor any indication that the kiosk is fully access compliant in all other ways, such as, providing clear and suitably displayed instructions for using the phone in a large easy to read typeface.

5.3 In light of the above, the Council therefore strongly disputes the appellant's assertion that the proposed kiosk has a 'sound functional design' given that the kiosk is not considered to be fully accessible and would unnecessarily exclude a proportion of society from using the kiosk by virtue of its poor functional design. As such, the design of the proposed kiosk is also considered to be contrary to policy C6 and standards advised under BS8300-1:2018 and BS-2:2018 as it would not be inclusive nor accessible to all.

6.0 Anti-social behaviour

6.1 With regards to community safety matters, a number of issues have been raised by the Metropolitan Police Crime Prevention Design Advisor. In particular it has been noted that existing telephone kiosks within the London Borough of Camden have become 'crime generators' and a focal point for anti-social behaviour (ASB). The design and siting of the proposal on a busy footway would further add to street clutter and safety issues in terms of crime and ASB, through reducing sight lines and natural surveillance in the area, and providing a potential opportunity for an offender to loiter. This would increase opportunities for crime in an area which already experiences issues with crime, therefore the proposal would be contrary to Policy C5 and CPG1 (Design).

7.0 Conclusion

7.1 The proposal would result in unacceptable street clutter, harmful to the character and appearance of the streetscape and to the detriment of pedestrian flows, as well as creating issues with safety and poor accessibility. The proposal, by virtue of its siting and appearance, is considered unacceptable.

8.0 Recommendation

7.1 Refuse Prior Approval