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Dear Martin Stephens,

Re: Communication Hub Unit

Thank you for submitting a pre-planning application enquiry for the above sites. Due to Covid-19, officers have been unable to undertake sites visit and have made the below comments based on a desktop assessment and consultation with relevant colleagues.

Proposal

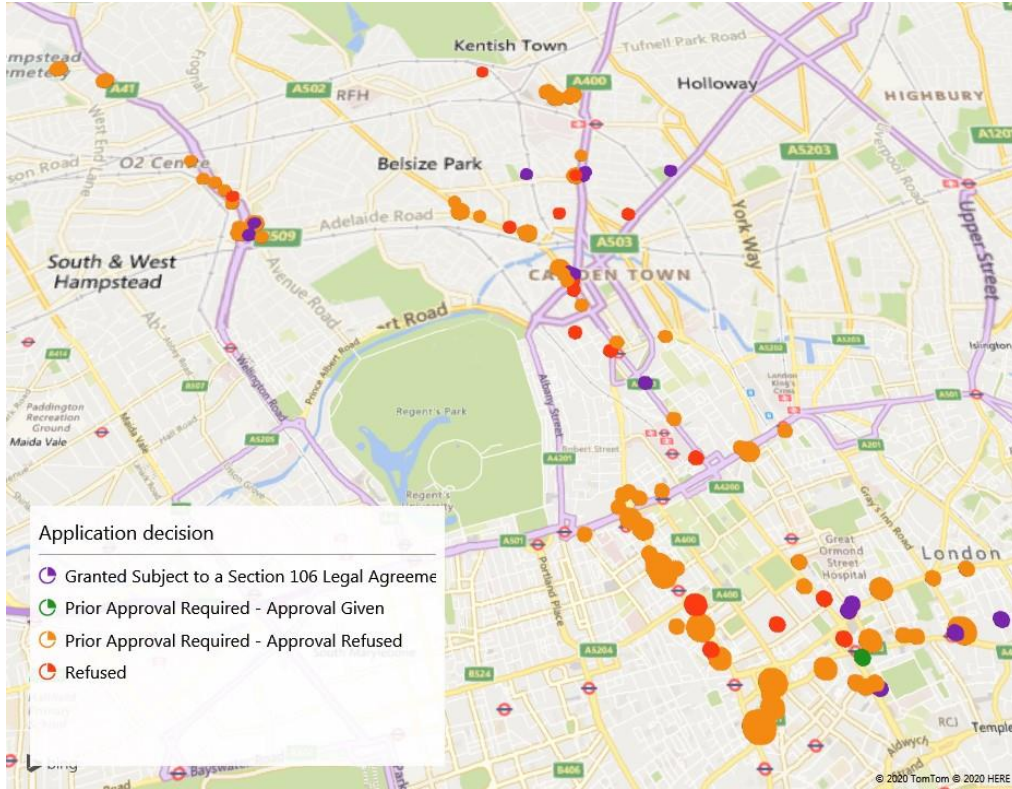
- Existing 27 kiosks of which 21 will be replaced with a new design
- Removal of 6 kiosks
- Additional 13 sites (if one of the 21 sites are unsuitable)

Assessment

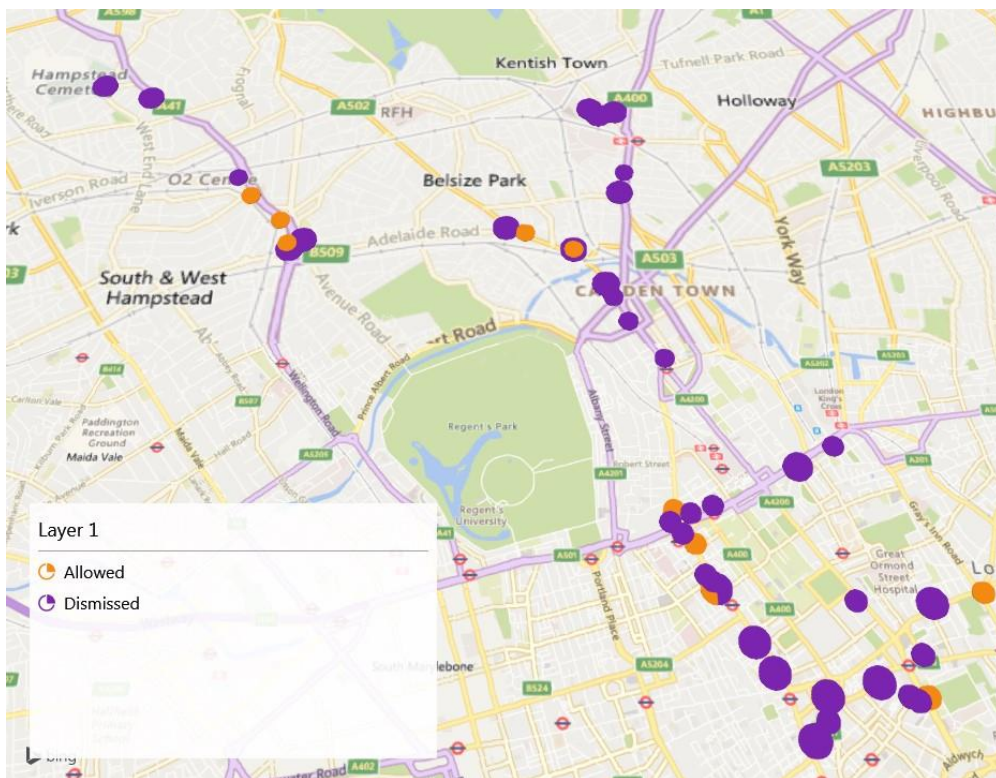
Planning considerations

- Planning need
- Design
- Conservation
- Highways/transport
- Community safety
- Advertisement

Background - The map below shows the location of recent applications for additional and replacement kiosks across the borough and outcomes. This demonstrates that there is a clear pattern for proposal locations and therefore the principal of kiosks in these locations has in many areas already been tested.



The map below shows the decisions which were appeals and the appeal outcome. The majority of appeals were dismissed with the Planning Inspectorate supporting the Council's application of planning policy in these locations.



In addition, whilst most applications were for prior approval, it is noted that permission was refused for the replacement kiosks of your existing stock. Whilst the design has since been amended, it is not considered that this overcomes the policy concerns.

Assessment

A detailed spreadsheet (see Appendix 1) has been provided with provides a site-specific breakdown for all new sites. This outlines whether a site is in a conservation area, near a listed building or proximity to a junction.

Planning Need - As planning permission is now required for the installation of a telephone kiosk, the Council can take into consideration more than just the siting, design and appearance of the kiosk. The Council is able to take into consideration all relevant planning policies and legislation.

The Council is also currently investigating underused and poorly maintained telephone kiosks within the borough. Planning Contravention Notices are served in order to ascertain the lawful status of kiosks and whether they are still required in accordance with condition A.2 (b) (Part 16 Class A) of the GPDO 2015.

As part of any application for phone kiosks, we would expect call data information is provided for all kiosks either to be removed or replaced. Under paragraph 115 of the NPPF, applications for electronic communications development should be supported by the necessary evidence to justify the proposed development.

We advised that it would be helpful to submit this information as part of the pre-application submission.

The need for phone kiosks is limited given mobile phone usage. Unless evidence can be provided to show an existing kiosk is still needed, well used and there are no other kiosks within close proximity, our concern would be that the kiosk would result in unnecessary clutter, contrary to policy.

Whilst the introduction of defibrillators across the borough has its benefits, this is not considered to outweigh the resulting harm from unnecessary street clutter and loss of pavement space.

The importance of protecting the public realm and or footways is demonstrated by the current covid-19 situation. In areas where there is high footfall and insufficient pavement width, the Council has been required to temporarily extend pavements to create additional space for pedestrians. The pressure on our pavements is a key issue.

Design

Policy D1 of the Camden Local Plan 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.

A key design consideration of the kiosk, whilst replicating elements of a traditional kiosk, appears to be the inclusion of a large digital advert. This has resulted in a structure which is dominant, visually intrusive and serves to detract from the appearance of the wider streetscene.

CPG Design advises 'the design of streets, public areas and the spaces between buildings, needs to be accessible, safe and uncluttered. Well-designed street furniture and public art in streets and public places can contribute to a safe and distinctive urban environment'. Street furniture should not obstruct pedestrian views or movement.

The overall scale of the proposed communication hub is too substantial and would have a negative impact on its surroundings. Of particular concern is the height, width and overall bulk of the structure. See below the indicative scale of the proposed communication hub in relation to a female adult and child, which puts the sheer bulk of the proposal into perspective.



The scale of the proposal would have a detrimental impact onto the public realm and the pedestrian experience, in particular on people's ability to look up and down the street, creating visual clutter. While the Infocus kiosk occupies a larger footprint, the height and width of the communication hub would affect visibility in a similar way.

This would also contribute to the obstruction of the pavement and public highway, making the movement of people more difficult and reducing street legibility.

The proposed material is 'metal chain grey'. Although we do not oppose to the use of metal, it seems that it has been used in a 'bulky' way, and the grey colour not particularly suitable to enhance its quality. A different tone could also contribute to a more playful and engaging piece of street furniture.

Whilst we are supportive of a modern approach, as a re-interpretation or similar design than previous iterations, the current proposal feels outdated.

If going for a modern design approach, we recommend looking at TfL's wayfinding signage for Legible London, which we consider a successful example for the quality of the materials and detailing, as well as its proportions.



As shown from the mapping above, the Council has received overwhelming support from PINS and our approach to applying planning policies in relation to telephone kiosk applications across the Borough.

Below are some examples from appeal decisions to demonstrate this approach.

Example of limited street clutter - The Planning Inspector concluded in paragraph 5 of a recent appeal decision to provide advertising to an nearby kiosk outside 297 Euston Road, London NW1 3AQ (APP/X5210/Z/18/3204104) that, *'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.'*

In Paragraphs 20-23 (and the conclusions contained within appeal decisions to refuse similar telephone kiosk applications) which dismissed appeals on a clear pavement outside Euston Tower on west side of Hampstead Road, London NW1 3DP (Appeals D and E ref: APP/X5210/W/18/3195366 & 3195365). The Planning Inspector concluded here that *"The kiosk would impinge here into a clear area uncluttered by any street furniture, which has been sensitively designed. As such it would spoil this uncluttered design by introducing a prominent feature that would look out of place"* (see Appendix B attached).

Conservation areas/listed buildings

In many locations, phone kiosks are located within or adjacent to conservation areas (see Appendix 1). In these cases, the provision of a phone kiosk, which is considered to be of a poor design, with digital advertisement, adding unnecessary clutter to the street scene, would have an impact on the conservation area.

Whilst the provision of a defibrillator is of some public benefit, this is not considered to outweigh the resulting harm to any conservation areas.

Transport issues

Policy T1 of Camden's Local Plan states that in order to promote walking in the borough and improved the pedestrian environment, we will seek to ensure that developments:

- a. Improved the pedestrian environment by supporting high quality public realm improvements;
- b. Make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- c. Are easy and safe to walk through
- d. Are adequately lit;
- e. Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them.

Policy D7 (Public Realm) of the New London Plan (Intend to publish) 2019 states that 'Applications which seek to introduce unnecessary street furniture should normally be refused'.

Policy A1 of the Camden Local Plan 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. 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. 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 9.1 of CPG Transport highlights that footways should be wide enough for two people using wheelchairs, or prams, to pass each other.

Paragraph 9.7 of Camden Planning Guidance document CPG7 (Transport) states that the Council will seek improvements to streets and spaces to ensure good quality:

- 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 unnecessary street furniture.

Section 3.01 of Camden's Streetscape Design Manual requires a minimum unobstructed pathway width within the footway, known as the 'clear footway'. This guidance and Appendix B of TfL's 'Pedestrian Comfort Guidance', outlines the recommended minimum footway widths for different levels of pedestrian flows and 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. Camden's Streetscape Design Manual (section 4.01), together with TfL's Pedestrian Comfort Guidance, states that street furniture should be placed a minimum of 0.45m back from the carriageway.

Given the limited detail at this stage we have indicated within the attached spreadsheet where we consider that the resulting footpath width would be below the guidance.

Community safety

As set out in Policy C5 of the Camden Local Plan, the Council requires development to incorporate appropriate design, layout and access measures to help reduce opportunities for crime. As such, careful consideration needs to be given to the design and location of any street furniture or equipment in order to ensure that they do not obscure public views or create spaces that would encourage anti-social behaviour (ASB). Camden Planning Guidance document CPG1 (Design) in Paragraph 9.27 states with regard to telephone kiosks in particular that, '*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.*'

With regards to community safety matters, the Metropolitan Police Crime Prevention Design Advisor has raised a number of issues in relation to the proposals.

It has been noted that telephone kiosks within the London Borough of Camden have become 'communication hubs' and a focal point for crime and anti-social behaviour (ASB), including begging. The proposed kiosk design raises safety issues in terms of crime and ASB, especially as sight lines and natural surveillance would be reduced, providing potential opportunities for an offender to loiter. The design offers 'cover and concealment' opportunities for crime due to the kiosk width and height. The small roof provides protection from inclement weather, and in combination with the small shelf, provides an ideal location for drugs misuse. The shelf also encourages users to leave the device while charging, so increasing opportunities for theft. The defibrillator has potential to be used as a 'seat' and the emergency button could be open to misuse. It is noted that there is no maintenance strategy.

There is concern that while the proposal involves the removal of a small number kiosks it is introducing kiosks in new locations. . Those proposed to be removed are not in 'high' crime areas, and as such, their removal would have less public benefit in crime and safety terms.

The design and siting of the proposal would therefore increase the opportunities for crime, especially as it would introduce additional street clutter in the some of the busiest footway and crime locations in Camden.

The main problem locations in crime and public safety terms are in the High Holborn and Shaftesbury Avenue areas, and therefore, any replacement or new kiosks in these areas in particular would not be acceptable.

The proposal would therefore be contrary to Policy C5 and CPG (Design).

Advertisements

Camden Planning Guidance for CPG Design advises that good quality advertisements respect the architectural features of the host building and the character and appearance of the surrounding area. CPG Adverts states that *'free-standing signs and signs on street furniture will only be accepted where they would not create or contribute to visual and physical clutter or hinder movement along the pavement or pedestrian footway'*.

Policy D4 (Advertisements) confirms that the *"Council will resist advertisements where they contribute to or constitute clutter or an unsightly proliferation of signage in the area."* (paragraph 7.82).

Camden Planning Guidance for CPG Amenity advises that artificial lighting can be damaging to the environment and result in visual nuisance by having a detrimental impact on the quality of life of neighbouring residents, that nuisance can occur due to 'light spillage' and glare which can also significantly change the character of the locality. As the advertisement is not located at a typical shop fascia level and would be internally illuminated, it would appear visually obtrusive.

Appendix 1 outlines areas where there are examples of existing digital advertisements for each new site proposed. Whilst there are often examples of static advertisements on existing kiosks, this does not mean their direct replacement with a digital advertisement would be acceptable.

Digital Roadside Advertising and Proposed Best Practice (commissioned by TfL) March 2013 advises that digital advertising signs will not normally be permitted if they are proposed within 20m of a traffic signals. We would resist any advertisements which impact on traffic signals or are located in close proximity to junctions. In addition, conservation areas and less commercial areas can be more sensitive to this type of advertisement. In some proposed locations, there are concerns with the impact of the advertisement on public safety.

The scale and design of the advertisement and structure have been outlined above. The location of other digital panels, does not automatically justify further digital advertisement in the streetscene. The resulting dominance of the advertisement on the structure, and its

prominence within the streetscene results in an addition which would be harmful to the amenity of the wider area.

If an advertisement were considered acceptable this would be subject to conditions to control the movement, luminance level and display.

Other issues

If the replacement of kiosks with a new design were to be accepted, we would seek to secure a Section 278 agreement to require the following:

1. remove existing kiosks prior to the installation of any new kiosks
2. management plan for the kiosks

Options

In its current form, this proposal is not considered acceptable in any location in Camden, due to:

1. Small number of kiosks proposed to be removed and kiosks added to new unobstructed locations
2. Overly large proposal and poor detailed design
3. planning need – lack of justification of the need for new kiosks or public benefit to outweigh the harm
4. Loss of footpath/impact on the public realm
5. crime and safety

You are advised that for the principle of additional kiosks to be supported the above concerns would need to be addressed.

Conclusion – On the basis of the above assessment and information submitted it is very unlikely that your proposals would be supported. This is unlikely to change unless you are able to justify the need for kiosks in these areas (including data of the use of existing kiosk), significantly reduce the scale of the structure (including the advertisement), improve its design and propose a greater overall reduction in kiosks.

Please Note: This document represents an initial informal officer view of your proposal based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

Please see appendix 3 for supplementary information and relevant policies.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Alyce Jeffery

Planning Officer

Planning Solutions Team

Appendices

Appendix 1 – assessment of new sites

Appendix 2 – list of appeals dismissed

Appendix 3 - policies

Appendix 2:

List of appeals dismissed

App Ref	Development Address
2015/0691/P	95 Tottenham Court Road, W1T 4TW
2015/0692/P	135 Cleveland Mews, London, W1T 4TW
2017/2493/P	29-31 Euston Road, NW1 2SD
2017/2494/P	286 Euston Road, NW1 3DP
2017/3444/P	3-13 Pancras Road, NW1 2QB
2017/3446/P	17-21 Euston Road, N1 9AL
2017/3448/P	2 York Way, N1 9AP
2017/3450/P	215 Euston Road, NW1 2BF
2017/3505/P	250 Euston Road, NW1 2PG
2017/3508/P	210 Euston Road, NW1 2DA
2017/3527/P	Hampstead Road, NW1 3DP
2017/3542/P	Hampstead Road, NW1 3DP
2017/3543/P	350 Euston Road, NW1 3AX
2017/3544/P	355 Euston Road, nW1 3AL
2017/3548/P	Warren Street, NW1 2BU
2017/3555/P	81-87 High Holborn, WC1V 6NU
2017/3556/P	10 Great Queen Street, WC2B 5DG
2017/3557/P	71 High HolborN, WC1V 6EA
2017/5418/P	186 Camden High Street, NW1 8QP
2017/5420/P	199 Camden High Street, NW1 7BT
2017/5421/P	197 Camden High Street, nW1 8NH
2017/5422/P	249 Kentish Town Road, NW5 2JT
2017/5423/P	1A Camden High Street, NW1 7JE
2017/5424/P	218 Eversholt Street, NW1 1BD
2017/5425/P	31 Chalk Farm Road, NW1 8AJ
2017/5429/P	126 West End Lane, NW6 2BR
2017/5431/P	319-323 West End Lane, NW6 1RN
2017/5432/P	274 West End Lane, NW6 1LJ
2018/0309/P	Warren Street Underground Station, NW1 3AA
2018/0310/P	23 Tottenham Court Road, W1T 1BJ
2018/0311/P	39 Tottenham Court Road, W1T 2AR
2018/0313/P	130 Euston Road, NW1 2AY
2018/0314/P	101 Euston Road, NW1 2RA
2018/0315/P	Warren Street Underground Station, NW1 3AA

2018/0316/P	75 Kingsway, WC2B 6SR
2018/0317/P	97 Southampton Row, WC1B 4HH
2018/0318/P	69-70 Russell Square, WC1B 5BA
2018/0319/P	229 High Holborn, WC1V 7DA
2018/0321/P	166 High Holborn, WC1V 6TT
2018/0322/P	190 High Holborn, WC1V 7BH
2018/0324/P	121 Shaftesbury Avenue, WC2H 8AD
2018/0325/P	1 St Giles High Street, WC2H 8AG
2018/0326/P	100-110 Euston Road, NW1 2AJ
2018/0328/P	7 High Holborn, WC1V 6DR
2018/0330/P	137-139 Euston Road, NW1 2AA
2018/0332/P	70 Theobald's Road, WC1N 3NR
2018/0334/P	1 Haverstock Hill, NW3 2BP
2018/0336/P	197 Kentish Town Road, NW5 2JU
2018/0337/P	53-79 Highgate Road, NW5 1TL
2018/0338/P	19 Highgate Road, nw5 1LB
2018/0339/P	42 Highgate Road, NW5 1NT
2018/0340/P	135 Camden High Street, NW1 7JR
2018/0341/P	241 Camden High Street, NW1 7BU
2018/0342/P	27-28 Chalk Farm Road, NW1 8AG
2018/0343/P	100 Avenue Road, NW3 3HF
2018/0344/P	88 Avenue Road, NW3 3HA
2018/0345/P	Finchley Road, NW8 6NN
2018/0346/P	511 Finchley Road, NW3 7BB
2018/0347/P	14-16 Camden High Street, NW1 0JH
2018/0348/P	17-24 Dobson Close, NW6 4RS
2018/0349/P	55 Fortune Green Road, NW6 1DR
2018/0351/P	108-110 Finchley Road, NW3 5JJ
2018/0352/P	255 Finchley Road, NW3 6LU
2018/0353/P	104 Finchley Road, London, NW3 5EY
2018/3828/P	27-28 Chalk Farm Road, NW1 8AG
2018/3829/P	511 Finchley Road, NW3 7BB
2018/3830/P	167 - 169 Shaftesbury Avenue, WC2H 8AN
2018/3831/P	16 Procter Street, WC1V 6NX
2018/3832/P	145-149 Tottenham Court Road, W1T 7NE
2018/5525/P	137-139 Euston Road, NW1 2AA
2018/5530/P	108-110 Finchley Road, NW3 5JJ
2018/5531/P	80 - 85 Tottenham Court Road, W1T 4TE
2018/5533/P	55 Fortune Green Road, NW6 1DR
2018/5534/P	7 High Holborn, WC1V 6DR
2018/5536/P	130 Euston Road, NW1 2AY
2018/5538/P	17-24 Dobson Close, London NW6 4RS
2018/5539/P	88 Avenue Road, NW3 3HA
2018/5545/P	121 Shaftesbury Avenue, WC2H 8AD
2018/5546/P	101 Euston Road, NW1 2RA
2018/5549/P	39 Tottenham Court Road, W1T 2AR

2018/5550/P	241 Camden High Street, NW1 7BU
2018/5554/P	24 Haverstock Hill, NW3 2BQ
2018/5555/P	166 High Holborn, WC1V 6TT
2018/5557/P	100-110 Euston Road, NW1 2AJ
2018/5558/P	Finchley Road, NW8 6NN
2018/5559/P	6 Gray's Inn Road, WC1X 8HG
2018/5560/P	70 Theobald's Road, WC1N 3NR
2018/5561/P	1 St Giles High Street, WC2H 8AG
2018/5562/P	90 Tottenham Court Road, W1T 4TJ
2018/5563/P	1 Haverstock Hill, NW3 2BP
2018/5564/P	104 Finchley Road, NW3 5EY
2018/5571/P	19 Highgate Road, NW5 1LB
2018/5572/P	53-79 Highgate Road, NW5 1TL
2018/5573/P	23 Tottenham Court Road, W1T 1BJ
2018/5576/P	42 Highgate Road, NW5 1NT
2018/5577/P	100 Avenue Road, NW3 3HF
2018/5578/P	190 High Holborn, WC1V 7BH
2018/5580/P	197 Kentish Town Road, NW5 2JU

Appendix 3

Policies

National Planning Policy Framework (2019)

London Plan (2016)

London Plan (Intend to Publish) (2019)

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

D4 Advertisements

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance

CPG Design (2019) - chapters 2 (Design excellence) and 7 (Designing safer environments)

CPG Transport (2019) - chapters 7 (Vehicular access and crossovers) and 9 (Pedestrian and cycle movement)

CPG Advertisements (2018) – paragraphs 1.1 to 1.15; and 1.34 to 1.38 (Digital advertisements)

CPG Amenity (2018) - chapter 4 (Artificial light)

Camden Streetscape Design Manual

Digital Roadside Advertising and Proposed Best Practice (commissioned by Transport for London) March 2013

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

Town and Country Planning (Control of Advertisements) (England) Regulations 2007

All pdfs submitted via the Planning Portal should be labelled so it is clear what the drawing or document relates to e.g. existing front elevation.

We are legally required to consult on applications with individuals who may be affected by the proposals. We notify neighbours by displaying a notice on or near the site and placing an advert in the local press. We must allow 21 days from the consultation start date for responses to be received. We encourage you to engage with the residents of adjoining properties before any formal submission.

Non-major applications are typically determined under delegated powers. However, if we receive three or more objections from neighbours, or an objection from a local amenity group, the application will be referred to the Members Briefing Panel if officers recommend it for approval. For more details click [here](#).