

Delegated Report		Analysis sheet	Expiry Date:	09/02/2022
		N/A	Consultation Expiry Date:	14/11/2021
Officer			Application Number(s)	
Nora-Andreea Constantinescu			2021/3744/P	
Application Address			Drawing Numbers	
o/s 20/22 Camden High Street BT Public Telephone Kiosk Public Footway London NW1 0JH			Refer to draft decision notice	
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature	
Proposal(s)				
Change of use from BT Standard KX100 Series public telephone kiosk to a Standard KX100 Series with new antenna containing small cell equipment and fan vent.				
Recommendation(s):		Refuse Full Planning Permission		
Application Types:		Planning Permission		

Reason(s) for refusal:	Refer to Draft Decision Notice					
Consultations						
Adjoining occupiers and/or local residents/groups	No. notified	00	No. of responses	00	No. of objections	00
Summary of consultation responses:	<p>A site notice was displayed on 20/10/2021 and expired on 13/11/2021.</p> <p>A press notice was published on 21/10/2021 and expired on 14/11/2021.</p> <p>.</p>					
Camden Town Conservation Area Advisory Committee	<p>Camden Town CAAC has objected to the proposed scheme on the following grounds:</p> <ul style="list-style-type: none"> Existing kiosk not of historic interest and of poor intrinsic design quality Should not be retained now that its original function is no longer required Detracts from the commercial street scene; in the case whether neglected and covered in fly-posting, or 'spruced up' and masquerading as a usable phone box (even if not available for use in that way) Attracts graffiti and fly-posting which has a detrimental impact on visual amenity. Takes up valuable public realm that would be better utilised for other objectives on the High Street, such as providing ease and equality of access. Street clutter which the retained kiosk contributes to has a strong negative impact on the public realm in the commercial area of the CA, and should be minimised wherever possible. Removing redundant kiosks would be a significantly positive step in achieving this. Prolonging their existence by enabling a future ongoing use from them, is therefore considered unacceptable. Concerns that this will provide opportunity for LED advertisements to be introduced in the future. 					
Site Description						
<p>The application site comprises an area of the public footway on the eastern side of Camden High Street near to the junction with Millbrook Place and Crowndale Road. The site lies within Camden Town Conservation Area and experiences high volumes of pedestrians each year.</p> <p>The footway is uncluttered, and the only street furniture are lampposts, small cabinet and the existing two telephone kiosk.</p> <p>Camden High Street is a TfL Red Route.</p>						
Relevant History						
Site history:						
Relevant planning history at the application site:						

No planning records at the application site.

Relevant planning history in vicinity of the site:

2018/0347/P - Land Adjacent to 14-16 Camden High Street LONDON NW1 0JH - Installation of 1 x telephone kiosk on the pavement. – **Prior Approval Required and Refused 15/03/2018; Appeal APP/X5210/W/18/3211502 Dismissed**

RfR:

- 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 and the Camden Town Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) 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.*

2017/1096/P - Land Adjacent to 14-16 Camden High Street LONDON NW1 0JH - Installation of 1 x telephone kiosk on the pavement. – **Prior Approval Required and Refused 05/04/2017;**

Relevant policies

National Planning Policy Framework (2021)

London Plan (2021)

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

D4 Advertisements

G1 Delivery and location of growth

T1 Prioritising walking, cycling and public transport

Camden Planning Guidance

CPG Design (2021) - chapters 2 (Design excellence), 3 (Heritage) and 7 (Designing safer environments)

CPG Transport (2021) - 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 (2021) - 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

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

Assessment

1. Proposal

1.1 It is proposed to change the use of the 1 x existing BT Standard KX100 telephone kiosk by adding within the existing plastic dome, a small cell installation and an antenna on top of the dome. No kiosks are proposed to be removed as part of this application.

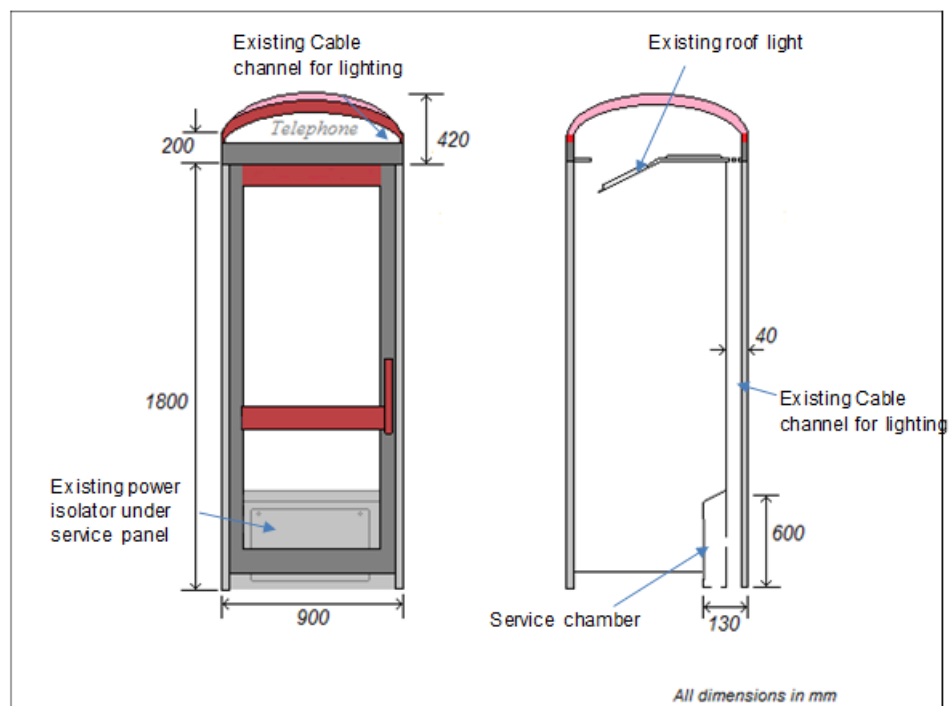


Image showing existing telephone kiosk with dome on top.

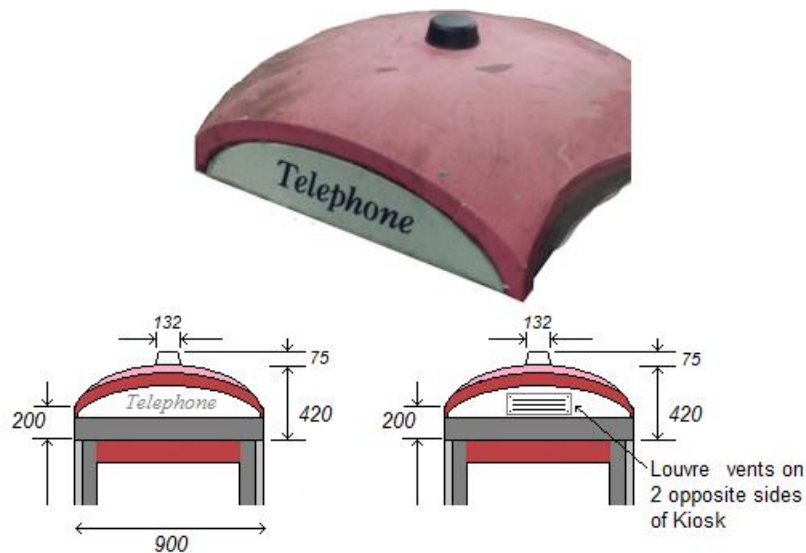


Image showing the new dome to be installed on top with antenna and small cell inside.

- 1.2 The proposed dome would add another 0.75m to the height of the existing kiosk and change the external appearance of the dome by adding a vent to two sides. The alteration would result in the telephone kiosk being able to provide high speed 3G or 4G mobile phone connectivity whilst maintaining the land line type of telecommunication service. This would result in changes the functionality of the kiosk and its use.

2 Assessment

- 2.1 On 25 May 2019, the GPDO was amended through the adoption of the Town and Country Planning (Permitted Development, Advertisement and Compensation Amendments) (England) Regulations 2019. This amendment has had the effect of removing permitted development rights to install a public call box under Schedule 2, Part 16, Class A of the GPDO.
- 2.2 As part of a separate enforcement investigation following complaints about the underused and poorly maintained telephone kiosks along Tottenham Court Road, the Council is actively investigating breaches of condition A.2 (b) (Part 16 Class A) of the GPDO 2015 which require telephone kiosks to be removed when no longer required for telecommunication purposes.
- 2.3 Planning permission is now required for the installation of new telephone kiosks and in this case the change of use. 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 when considering the assessment of the structure. There are no planning records in support of the existing telephone kiosks, and no information has been provided to confirm it is still necessary for its telecommunication purposes. Whilst it is assumed the kiosks were installed as part of the now superseded permitted development rights, the Council considers that the existing kiosks in themselves are no longer needed for their telecommunication purposes as they are underused, poorly maintained and generators of anti-social behaviour. Given the requirement under condition A.2(b) to remove them, limited weight is given to the existing structures.
- 2.4 The proposed changes to the dome of the kiosk to include small cell antenna and provide high speed 3G and 4G mobile phone connectivity would result in change to the functionality of the kiosk and its use. Whilst officers understand the general need for greater connectivity, no information has been provided to demonstrate that the proposed small cell antenna can only be installed on such structure.
- 2.5 The kiosks are covered in unauthorised advertisements with some panels blacked out with paint (see below). The existing kiosks are poorly maintained and there are clear signs of ASB (as shown

below). This reflects the fact that BT do not actively maintain the kiosks unless a complaint is made to them directly.

3 Design

- 3.1 Policy D1 (Design) 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. Policy D2 (Heritage) of the Camden Local Plan recognises that the setting of heritage assets is of great importance and should not be harmed by unsympathetic neighbouring development.
- 3.2 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.
- 3.3 The proposed structure sits within a clear area of public footway, characterised by a complete lack of bulky items of street furniture adjacent to the kerbside, except for the existing kiosk. The kiosk has been installed without consideration of its impact on the streetscene and general relation with the nearby buildings and pedestrian flows. It does not appear well integrated within the public realm, and its lack of maintenance acts as a magnet for anti-social behaviour. The image below shows its incongruous appearance being covered in graffiti and general neglect which attracts anti-social behaviour such as fly tipping and detracts from the character of the street. At a time of re-invention of the street, with widening of pavements and appreciation of generous public realm, these proposals are a disappointing reinstatement of underused pavement clutter.



Google streetview image of the kiosk April 2021, showing general poor maintenance and fly tipping.



Google streetview image of the kiosk November 2021, showing general poor maintenance and fly tipping.



Google streetview image of the kiosk July 2021, showing general poor maintenance.

- 3.4 The site lies within Camden Town Conservation area and therefore the statutory requirement under section **s.72** of the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended by the Enterprise and Regulatory Reform Act 2013 is for development to preserve or enhance the character and appearance of the conservation area. The kiosk in its current form was never designed to fit within the character of conservation areas, but rather to provide a structure which provides shelter whilst the user makes a phone call. In the current day and age where the mobile phone ownership has increased considerably, the service which the structure provides is no longer required for telecommunication services, and therefore this should be removed.
- 3.5 As such, the proposed kiosk appears as a particularly obtrusive piece of street furniture and unduly dominant in this context, adding to visual clutter harmful to the streetscene, which would not preserve nor enhance the character and appearance of the conservation area. In this regard, the proposal would fail to adhere to Local Plan Policies D1 (Design) and D2 (Heritage).
- 3.6 The Council considers that the provision of high speed 3G and 4G connectivity can be provided in different ways, such as attached on existing lamp posts or existing buildings, which would ensure the public areas are accessible, safe and uncluttered.

4 Highways/footpath width

- 4.1 While it is recognised that there is an existing kiosks located at the application site, planning permission is now required for the proposed alterations which would result in changes to the kiosk's functionality and use. There are no planning records to show the acceptability of the existing kiosk and therefore the proposed alterations to make the structure permanent are not justified.
- 4.2 Policy D8 (Public Realm) of the London Plan 2021 states that development should '*Applications which seek to introduce unnecessary street furniture should normally be refused*'.
- 4.3 Policy T2 (Healthy Streets) of the London Plan 2021 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*'. It is considered that the kiosk currently fails to deliver any improvements which support any of the ten Healthy Streets Indicators, and the proposal would continue to do so.
- 4.4 Policy A1 (Managing the impact of development) 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, 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.
- 4.5 Policy T1 (Prioritising walking, cycling and public transport) 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 9.10 of CPG Transport highlights that footways should be wide enough for two people using wheelchairs, or prams, to pass each other. Furthermore, it 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 subsections 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.
- 4.6 Paragraph 9.7 of CPG 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.
- 4.7 Paragraphs 7.41 and 7.42 of CPG Design provide guidance on telephone boxes and kiosks. Paragraph 7.41 states that '*In all cases the Council will request that the provider demonstrates the need for the siting of the new facility. We will consider whether kiosks add to or create street clutter, particularly if there are existing phone kiosks in the vicinity*'. Paragraph 7.42 states that '*All new*

phone boxes should have a limited impact on the sightlines from or of the footway and should not hamper pedestrian movement. The size of the 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'.

- 4.8 This is supported by Policy C5 (Safety and security) of the Camden Local Plan which requires development to contribute to community safety and security. In particular, Paragraph 4.89 states that *'The design of streets, public areas and the spaces between buildings needs to be accessible, safe and uncluttered. 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 antisocial behaviour'.*
- 4.9 The site is located on the busy high street, in a high footfall area in Camden Town, close to Mornington Crescent underground station and in between Camden Town station underground station to the north, and numerous bus routes. This area in Camden Town experiences extremely high volumes of pedestrians (arguably the highest in the Borough) and are forecast to increase significantly when Crossrail services become operational (was due to be December 2018 but now forecast for 2022) along with ongoing economic growth in Kings Cross and Central London. Pedestrian volumes are also forecast to increase significantly when High Speed 2 (HS2) services become operational. Existing footway space is a scarce resource and must be safeguarded for pedestrians both now and in the future to accommodate economic growth.
- 4.10 The site is located on Camden High Street (A400) which forms part of the Strategic Road Network (SRN). Camden Council is the highway authority, although it should be noted that Transport for London (TfL) has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The existing kiosk is located on the footway on the east side of Camden High Street, at 11m distance from traffic lights to the north, and in proximity to the junction with Millbrook Place and Crowndale Road. The footway is characterised by a complete lack of bulky items of street furniture adjacent to the kerbside, except for the existing kiosk. The footway in this location has a width of 4.8m. The kiosk is offset from the kerb by 900mm and the remaining usable footway has a width of 3m. Pedestrian Comfort Guidance for London advises that in areas of high flow, where there is no street furniture (except lamp posts) the minimum footway width should be no less than 3.3m, to allow two groups to pass. The existing kiosk has not been located in a recognised street furniture zone and is situated in the pedestrian desire line along the footway, creating obstruction and harm to pedestrian flows. The proposal to maintain the kiosk permanently at this location would therefore have a significant impact on pedestrian movement and sightlines along the footway. The loss of any available footway space at this location is considered to be unacceptable due to the high footfall location in Camden Town. Pedestrian footfall is high at this location and this is predicted to increase significantly with ongoing economic growth in Central London and High Speed Two (HS2) currently under construction. The proposal should be refused on this basis.
- 4.11 As such, the proposal to maintain the telephone kiosk permanently at the above site would re-introduce a significant physical and visual obstruction to an otherwise clear and unobstructed pedestrian environment. The proposal would fail to improve the pedestrian environment at the site. This is unacceptable in such a high footfall location in Camden Town. The 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). Given the proposed functionality to increase network connectivity, this has potential to result in clusters of people loitering around the kiosk, which would further impede the pedestrian flows. The proposed telephone kiosk would therefore obscure sightlines along 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.
- 4.12 The change of use to the proposed telephone kiosk, by being located in a high footfall area, would have a detrimental impact on the walking experience due to a significant 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 and colliding with each other or vehicular traffic, or indeed with the telephone kiosk. Given the reduction of the footway as a result of the kiosk, its permanent retention would have significant impact on pedestrian amenity, comfort and safety. For these reasons, the proposal is considered contrary to Local Plan policies A1 and T1 and should be refused on this basis.

5 Anti-social behaviour

5.1 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). Specifically, in relation to the locations of the kiosks around Camden Town, there is a common theme among the crime statistics; all these areas have a major issue with street crime and in particular ASB, pickpocketing and theft from person. They are also recognised as being areas of significant footfall with both commuters, local residents and numerous tourists, similar to the application site.

The lack of use and design of the kiosk, encourages advert papers, graffiti, prostitutes cards, fly tipping and general dirt, is creating a focal point for ASB which contributes negatively to the general streetscene experience of residents in this area, and other pedestrians. BT currently do not actively maintain their stock but only respond to complaints made.



The design and siting of the kiosk effectively creates a sheltered structure to hide within, on a busy footway. This 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. The proposed functionality and use of the kiosk to provide high speed connectivity, would not address the issues with ASB from the design of the kiosk and its lack of use. Improving speed connectivity for people using their mobiles in the wider area would make people less likely to use the kiosk. The kiosk creates opportunities for crime and would be contrary to Policy C5 (Safety

and security) and CPG Design. No maintenance strategy has been submitted to demonstrate commitment to ensuring the proposed kiosk would be properly maintained and not contribute further to ASB.

5.2 The Council experienced issues with the BT InLink kiosks located closer to Camden Town underground station. Residents and members reported a rise in anti-social behaviour and crime as a direct result of these kiosks being installed. These activities include increased instances of loitering, as well as usage of the free calls facility to coordinate drug deals. This has been most apparently in areas such as Euston and Camden Town. Other boroughs such as Tower Hamlets and Islington have experienced similar issues and few boroughs are supporting the installation of more of such structures.

6 Public benefit

6.1 Policy A1 (Managing the impact of development) 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.

6.2 Local Plan Policies D1 and D2, consistent with Chapter 16 (Conserving and enhancing the historic environment) of the NPPF which seeks to preserve and enhance heritage assets, state that the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.

6.3 More specifically, Paragraph 196 of the NPPF states that *'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

6.4 Paragraph 92 of the NPPF states that *planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction [...] through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, [...] safe and accessible, so that crime and disorder and the fear of crime, do not undermine the quality of life or community cohesion, [...] through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active continual use of the public area.'*

6.5 The Council acknowledges the need for greater connectivity with regards to telecommunication networks and facilities. VuCity Ofcom data shows that between 80%-100% of the premises within the area have Ultrafast Broadband (100Mbit or greater) coverage from fixed broadband. No information has been provided to establish the connectivity capacity of the proposed small cell equipment and how this would contribute to a greater connectivity in the area. No information has been provided to the Council to justify that installing this equipment on a phone kiosk is the only way to provide this functionality. Nevertheless, it is acknowledged that the proposal would include a public facility, like 3G and 4G high speed internet connection and thereby result in some public benefit. It is also noted more generally, that as a result of the ongoing Covid-19 outbreak, the need for wider pavements to support social distancing has been challenging when pavements are obstructed by telephone kiosks underused for their telecommunication purposes but are ABS generators. The footway in this location does not comply with the TfL Pedestrian Comfort Guidance and therefore the existing kiosks are considered to have a significant impact on pedestrian amenity, comfort and safety.

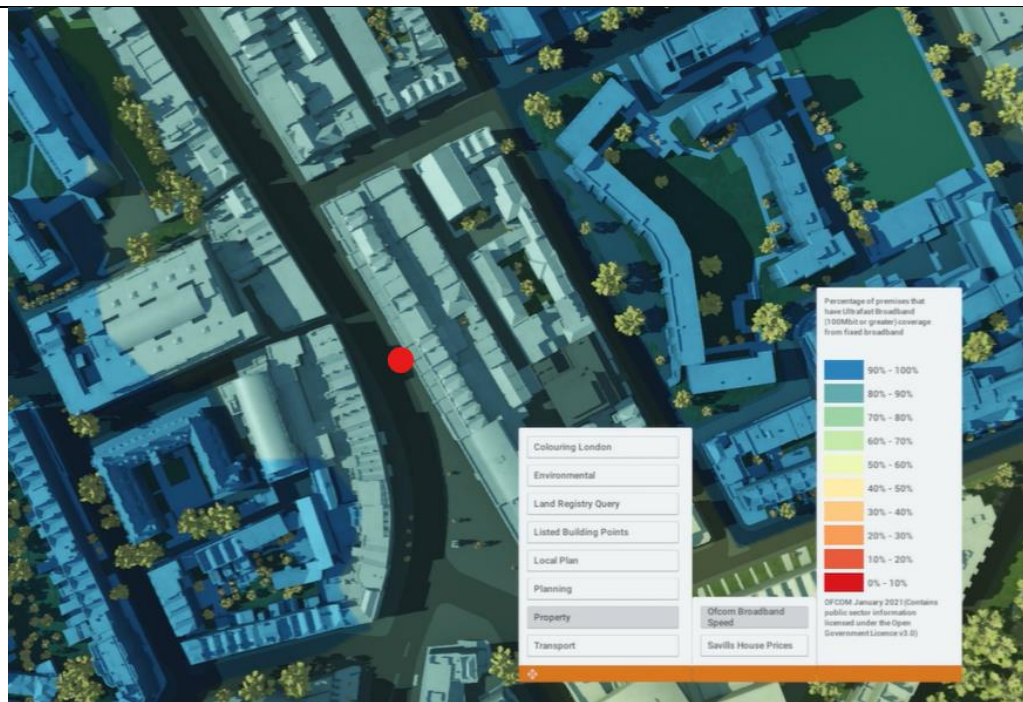


Image showing VuCity Ofcom Broadband Speed data and the application site with the red dot.

6.6 Within approximately 1000m of the application site, north around Camden Town Area and south, around Euston, previously granted consent which provide high speed internet connection, and free phone calls facilities amongst others. A number of telephone kiosks area located within proximity of the application site. Based on current and ongoing enforcement investigation it has been found generally that telephone kiosks are not used for telecommunication purposes, but rather for antisocial behaviour, and therefore the need for such facility in this location is not justified. Furthermore, no evidence has been provided as to how these types of facilities might be appropriately and safely used under current circumstances, especially given the prevalence of personal mobile phone ownership which already provides the functionality proposed.

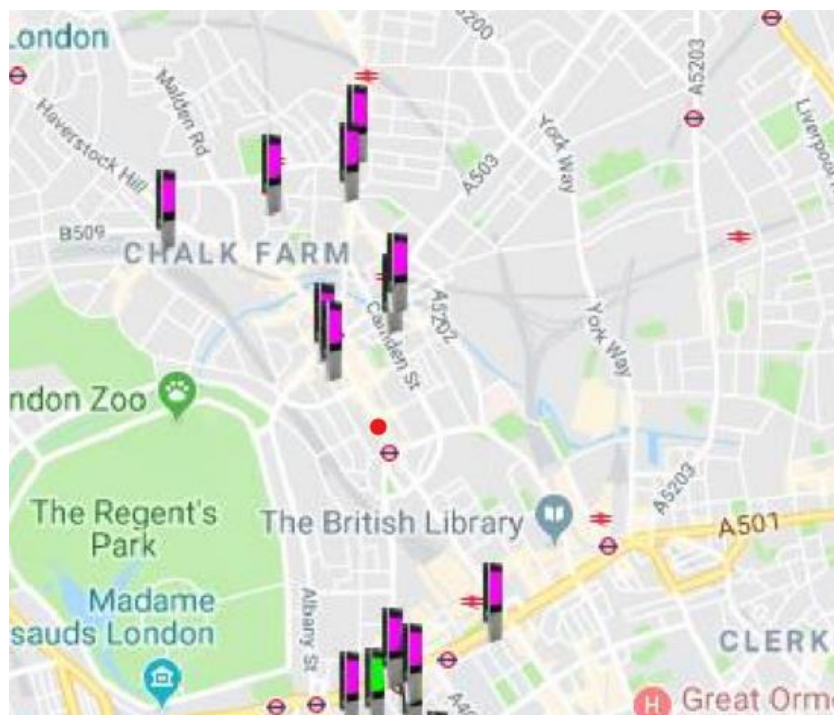


Image showing extract from BT InLink Planning Statement submitted with application ref no 2018/1032/P (withdrawn), with pink InLink units installed, and application site with red dot.

6.7 Weighing the less than substantial harm caused as a result of the proposed development against this limited public benefit, it is considered on balance that any benefit to the public arising from the

functionality and change of use of the kiosk would not outweigh the harm arising to the character and appearance of the streetscene, and Camden Town Conservation Area.

6.8 Overall, therefore, on balance, the proposed development does not accord to Section 16 of the NPPF which seeks to preserve and enhance heritage assets, nor to Section 92 which aims to achieve healthy, inclusive and safe places which promote social interaction, and the proposal is considered on balance to be unacceptable in design terms and impact on pedestrian amenity, comfort and safety.

7 Conclusion

7.1 The proposed change in kiosk functionality and use would result in maintaining an existing structure which contributes to proliferation of unacceptable street clutter, harmful to the character and appearance of the streetscape, and Camden Town Conservation Area. The proposal would also be detrimental to pedestrian flows, as well as, creating issues with safe pedestrian movement. The proposal is therefore considered to be unacceptable and contrary to the aforementioned policies.

7.2 If the application was considered to be acceptable, the Council would seek an obligation attached to any planning permission for the applicant to enter into a legal agreement to secure the removal of all kiosks prior to the installation of any new functionality of existing kiosk. This agreement would also secure controls to ensure that any kiosk is well maintained and that the advertisement is only in place whilst the telephone element is in operation.

8 Recommendation

Refuse planning permission

8.1 The proposed alterations to existing telephone kiosk by reason of the change in the structure functionality and use would result in a permanent structure which due to its location, position, detailed design and size would add visual clutter and detract from the character and appearance of the streetscene and Camden Town Conservation Area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

8.2 The proposed alterations to existing telephone kiosk by reason of the change in the structure functionality and use would result in a permanent structure which due to its location, position, detailed design and size would result in 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 and pedestrian 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.

8.3 The proposed alterations to existing telephone kiosk by reason of the change in the structure functionality and use would result in a permanent structure which due to its location, position, detailed design and size would add unnecessary street clutter which would increase opportunities for crime in an area which already experiences issues with crime, therefore the proposal would be contrary to policy C5 (Safety and security) of the London Borough of Camden Local Plan 2017.

8.4 In absence of a legal agreement to secure the removal of the existing kiosks and a maintenance plan of the proposed kiosk, the proposal would be detrimental to the quality of the public realm, and detract from the character and appearance of the streetscene, contrary to policies D1 (Design), 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.