

## **Phone Boxes on Kilburn High Road**

*Audit of phone boxes and response to New World Phones planning application to replace them.*

An audit of phone boxes on Kilburn High Road was undertaken on 04/03/2018 following the recent planning applications from New World Phones to replace some of them.

### **KEY FACTS**

1. Length of Kilburn High Road: 1Mile (1.6 Km)
2. number of public phones = 21. That is one phone every 152 meters on both side if spread evenly, not the case obviously
4. Operators are BT and New World phones.
5. New World operate 8 phones, BT 13 phones
6. 5 Boxes on Brent side (BT exclusively) 15 Boxes and one kiosk on Camden side.
7. the largest concentration of boxes is between 188 and 278 Kilburn Road. This is a 0.25 mile stretch and contains 9 Boxes ie 43% of boxes on the Kilburn High Road concentrated on 25% of total length of the High road. That is one box every 44 meters. 3 are run by New Word Telephones, 6 by BT
8. Most boxes are in complete state of disrepair with glass or/and doors missing, dirty surfaces
- 9 BT installed recently a communication point in front of Primark.
10. Width of public pavement varies significantly along the High Road, some current boxes having impact on pedestrian traffic where the 2m clearance on pavement has not been achieved.



### **NEW WORLD TELEPHONES APPLICATION**

New world operate 8 phone boxes on the Kilburn High Road at the following sites

Site 1 1 box at the corner of Maygrove Road and Kilburn High Road

Site 2 2 boxes at 244 Kilburn High Road in front of Arthur Murray Dance Studio

Site 3 1 box at 188 Kilburn High Road in front of Paks's Cosmetics

Site 4 1 box at 142 Kilburn High Road in front of Aldi

Site 5 1 box at 106 Kilburn High road in front of Lloyds Bank

Site 6 1 box at 70 Kilburn High Road in front of TRAIID

Site 7 1 box at 32 Kilburn High Road in front of starbucks

The planning applications include removal of some boxes if planning for replacement and advertisement consent are given site by site. This means that:

Site 7 replacement of box would guarantee removal of site 5

Site 6 replacement of box would guarantee removal of site 1

Site 4 replacement of box would guarantee removal of site 3

Site 2 replacement of 1 box would guarantee removal of 1 box at same site.

Thus if planning permission is given the number of sites would reduce from 8 to 4.

New World telephones have a license with OFCOM thus can, due to an outdated piece of legislation, install phone boxes on public space without planning permission. However these boxes cannot obstruct public pavements nor be used for any other purpose than supply public phone access and cannot be an “eyesore” in a protected environment. Adding services to a phone box, additional to phone services, requires planning permission. This is the case for example of advertising and ATM’s. Public phone boxes are not profitable as per BT own recognition. However BT, not New World Phones, have to provide access to public phones in public areas as terms of their license, thus supplying universal service, like the Royal Mail have to provide with post boxes. This explains why BT have not removed more of their boxes yet, but they have plans to reduce their phone boxes number from 40000 to 20000 across the UK. Thus operators have been trying to capitalise on the space their phone boxes use for other services that are more profitable (ie ATM’s and advertising).

Planning permission for these new phone boxes can only be rejected on the following grounds:

1. design does not meet requirements for use as access to public telephone services
2. obstruction to public spaces (highways and pavements)
3. Increase potential for distraction of highway users thus increasing likelihood of traffic accidents in high traffic area.
4. not in keeping with the area heritage (conservation areas)
5. design would potentially increase possibility of anti social behaviour, ie Fly Posting, urination in public
6. design could possibly facilitate increase in crime by enabling concealment.

Additionally most new phone boxes application require advertising consent as they all contain new illuminated LCD advertising screens. Consent for this kind of advertising will be declined if it is deemed that it would have detrimental impact on street scene and safety.

***While the KNPF welcomes the removal of 4 boxes, we objected with the following:***

The Kilburn Neighbourhood Plan Forum would like to make the following comments and objections to the planning application from New World Telephones relating to the Neighbourhood Forum designated area.

Comments applying to all 4 planning applications:

### **Background to Kilburn High Road:**

Kilburn High Road is a very busy High Street with narrow roads and pavements. Pavement furniture currently very often impedes free flow of pedestrians and all efforts should be made to facilitate pedestrian flow. (London Mayor target to reach 80% of journeys by foot, public transport or bicycle).

The High Road suffers from a higher than average road traffic accident rate. The October 2017 Liveable Neighbourhood bid to TFL shows that there were 177 traffic casualties during a 36 month period to December 20166 (Appendix C: Road Danger Reduction Statement). Thus all efforts should be undertaken to remove distractions for road users. To that effect we have noted that TFL and JC Decaux are in the process of renewing all bus stops. All illuminated LCD advertising on bus stops is now parallel to the kerb rather than perpendicular to the Kerb except at Brondesbury station (top of the High Road) and in front of the library (bottom of Kilburn High Road).

Crime rates are high and use of street furniture to harbour beggars is frequent, thus the Kilburn Liveable Neighbourhood Bid states “Landscape and street furniture designs should prevent concealment” (Appendix D KilburnLNbid Crime and Security Statement FV)

### **Future maintenance of Kiosk**

We note that New World phones currently operates phone boxes on 6 sites directly along the Kilburn High Road, all sites being single boxes except the site outside of 240 Kilburn High Road, where 2 adjacent boxes are operated. All the boxes are in a very poor state of maintenance with broken side panels, missing doors and badly overpainted frames. We welcome the intention to upgrade some of the boxes and remove some but cannot support the application unless there is a binding maintenance schedule of new kiosks as we fear the new Kiosks will deteriorate very quickly and fall in a similar state of disrepair very quickly, thus blighting the street scene.

**Kiosk Design:** The colour of the proposed replacement kiosks is more in keeping with our area with black bollards and kerb fences. We do appreciate the provision of a way finder screen and free WI-FI. However we would prefer the replacement to bring additional benefits, like a bench as the new Smart Benches provide in other areas in London. Resting places are very much needed on the High Road. The design in itself has no architectural merit and would represent an other new design in a very busy street scene where all telephone boxes are of a very similar square design. The much wider width (1096mm) compared to current boxes of (948mm) will impact on pedestrian flows unless the longer side is placed parallel to the kerb and not perpendicular. The public functionality proposed by the Kiosk does not justify the width of the LCD screen as all such functionality could be provided on a 50cm wide column rather than 1096mm. The total opaqueness of the LCD side could provide concealment as when approaching the box, pedestrians will not be able to see the presence of a person behind the screen. Currently the presence of a person can be detected as the boxes have a visible space at the bottom. This could be changed by raising the Kiosk on feet. In conclusion the current design does not meet the requirements of the Kilburn High Road environment. We welcome the absence of a door, making access for less mobile users easier, however we question the positioning of the equipment as possibly being too high to be used by wheelchair/mobility scooter users.

**LCD advertising screen.** Currently all pavement LCD advertising screens are parallel to the kerb side along the whole length of Kilburn High Road and are only on some bus shelters, with the exception of 2 bus stops mentioned above (perpendicular screen) and the new Inlink UK BT information screen outside Primark. We believe that placing new LCD advertising screens perpendicular to the footpath would create distraction and possibly more road danger for incoming vehicles and we thus strongly object (on safety grounds) to having such structures on the High Road unless the applicant can substantiate with data the contrary on a similar very busy High street environment. Furthermore the LCD screens would not bring any benefit to the users of the High Road and would further compromise the High Road visual environment.

### **Proposed removal of 4 telephone boxes:**

We welcome the proposed removal of 4 boxes. We would like the removal of these boxes to be independent of the replacement of other boxes with a kiosk as they clearly have been identified as redundant by New World Telephones.

Comments specific to site at 240 Kilburn High Road

We welcome the removal of one box. Apart from the objections above we cannot agree to the positioning of the replacement KIOSK as proposed. There were 2 stabbing recently at the corner of Grangeway and Kilburn High road, meters away from the site and thus the requirement to avoid

street furniture that can provide concealment is extremely important. The site is not only on the High Road but very near Grange Way, access to the only park and associated anti social behaviour. The pavement is relatively narrow at this site especially with the closeness of a tree. We propose (should any other objection ground be dismissed) that the kiosk is orientated with the LCD side parallel to the kerb, with a 45cm regress from the Kerb. This would allow for adequate pedestrian flow, remove concealment from pavement users and reduce distraction for road users.

We would as well seek assurances that both existing boxes are removed before installation of a new kiosk.

#### Specific comments relating to site at 24-32 Kilburn High Road

While there is precedent for LCD advertising at the nearby bus stop, we would prefer (should any other objection grounds be rejected) to have the LCD screen parallel to the kerb. This area of the High road will become far busier in the near future with the South Kilburn developments (adjacent to site). South Kilburn is a designated growth area where most residents will want to access public transport using the pavement outside 32 Kilburn High Road. Thus keeping the unobstructed pavement width to a maximum is very important.

We would like to seek additional reassurances that the phone box at 106 Kilburn High Road will be removed before replacement of the kiosk in front of 32 Kilburn High Road should planning permission be given.

#### Specific comments relating to site at 70 Kilburn High Road

This site is located in proximity of a busy junction with West End Lane and has very high footfall. We would suggest that the Kiosk (if all other objection grounds are dismissed) be located nearer to the kerb (ie 450mm) in the orientation proposed. This would increase unbroken pavement space and prevent pedestrians from walking at the back of the kiosk when the pavements are very busy as it is important to note that this section of the pavement is recessed compared to the pavement immediately north. We would seek additional assurances that the phone box in Maygrove Road is removed before work commences at this site should planning permission be granted.

#### Specific comments relating to site at 158-162 Kilburn High Road

This site occupies the busiest pavement length of the High Road. The proposed site plan supplied to support the application is slightly misleading as there is a private forecourt in front of Aldi approximately 900mm wide that could in the future be used by a new retailer without planning permission. Placement of the phone kiosk would only achieve an unobstructed pavement space of approximately 1800mm, which is very narrow for an area of very high footfall. Additionally the proposed positioning is right outside the entrance/exit of Aldi thus a more congested area. We would suggest (if other objection grounds are dismissed) to move the kiosk about 20 meters north of the current site where there are no shop entrances, keeping the proposed orientation.

We would also seek assurances that the phone box at 188 Kilburn High Road is removed even if this planning permission is not granted. The placement of the current box at 188 Kilburn High Road is now unacceptable on the basis of obstruction to pedestrian movement. It is on a very narrow pavement with new shops that attract very high footfalls.