Planning, Design and Access Statement

Our Ref.	CMD-212
InLink Address	Tottenham Court Rd (OS No 39)
Postcode	W1T 2AR
Lat/Long	51.51894,-0.132736
Project Type	New Site.
Conservation Area	**No**
Statutory Listed Buildings	**No**
TfL Red Route	**No**

InLinkUK is a London-based technology company working in exclusive partnership with BT to deliver a connected-city solution. This solution sees the removal of existing payphones and installation of InLinks that provide a range of free services to enhance the public realm and improve the amenity and digital connectivity of local communities in urban areas.

As part of our collaborative approach to connecting and improving local streets, **full Planning Permission and Express Advertisement Consent is sought for the installation of one (1) InLink** with the recommended conditions of consent included at the end of this Statement:

To ensure maximum amenity benefit for the local area, the services provided by the InLink will be **available free for everyone** (not just BT customers) as they are funded through the inclusion of static commercial advertising alongside Council and community content on the two digital display screens in the same manner as television stations like ITV and Channel 5.

No public funding is involved in the roll out of InLinks or the associated payphone removals within the United Kingdom.

To ensure effective integration with the streetscape the two InLink digital display screens are smaller than most other types of outdoor digital signage and automatically dim at night to 600cd/m^2 in accordance with the levels set for this type and size of screen (those under 10m^2) by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.

At no cost to taxpayers or users, the proposed InLink and associated payphone removals will improve the public realm by reducing clutter and providing everyone in the community with an unprecedented suite of essential urban tools, including free ultrafast Wi-Fi and free phone calls, free council and community advertising, maps and wayfinding, device charging, an emergency 999 call button, public messaging capabilities, and a platform for future technologies like air quality monitoring.

Payphone removals and the installation of an InLink will provide a positive effect on local and visual amenity by reducing the amount of street furniture on pavements in

the area and providing free services through a modern and aesthetically pleasing addition that will assimilate well into the street-scene.

A range of factors are considered when choosing the site for each InLink. For more information refer to the Site Selection Criteria section below.

We would look to work with the Council to confirm which removals should be conditioned as part of any subsequent planning approvals. A list of proposed condition is included at the end of this Statement that could be used by the Council to further facilitate this as part of any approvals.

This proposal is part of a package of applications submitted to Camden Council and aligned to the UK Digital Strategy and the National Planning Policy Framework.

Further detail is provided in the attached InLink Product Statement and associated documents.

What is an InLink

InLinks are a fully-accessible piece of community infrastructure helping connect and improve local streets in urban areas. At no cost to taxpayers or end users, InLinks provide communities with an unprecedented suite of essential urban tools that are fully detailed in the attached InLink Product Statement, but include:

- **Free ultrafast Wi-Fi with speeds up to 1 Gb per second within 100m** of each InLink. More than 143,000 unique users have already subscribed to the Wi-Fi, which as of August 2017, saw them use enough data to view over 405 million webpages

- **Touchscreen tablets** to access council services, BT's phone book, maps and directions, with more than 45,000 tablet sessions every week

- **Accessible** in design including hearing induction loops, braille embossed and TalkBack functionality in the tablet for those with disabilities

- All InLinks are powered by **100% renewable carbon-free energy** with screens **dimming to 600cd/m^2 at night** in line with the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements

- Maintenance of InLinks is paid for and undertaken by InLinkUK, and each InLink is **inspected weekly and cleaned every two weeks**, with the ability to rapidly respond on an as-needed basis to feedback and any issues monitored by internal sensors.

- With a **footprint of just 0.22m^2** InLinks are smaller than any comparable street furniture, and the installation of **each will typically facilitate and fund the removal of up to two existing BT payphones** giving back 1.78m^2 for each installed

- **438 hours of council content** are provided for free on on each display screen of each InLink per year for the Council to promote local initiatives, news, and events. This equates to 5% of every hour of screen time.

- Direct **access to charities** through the use of the dedicated charity tile on the fully-accessible interactive tablet

- Over 1,000 hours per year of hyper-local content allow each InLink to act as a **community notice board** with the InLinkUK team able to work with local groups to promote nearby events and activities

- Secure power-only USB ports for **rapid device charging**

- **Free phone calls for everyone** to UK mobile, local or national numbers, including the option to plug in headphones for more privacy, with approximately 45,000 free calls made each week. Unlike payphones, InLinks do not include or require a handset

- **Seeking to improve the sense of safety in an area** and assisting the reporting of crime and disorder by providing a **direct 999 call button** with

location sharing and two-press approach to limit accidental activation, with the screens able to be used by groups such as the Police to display emergency and community messaging.

- The opportunity to integrate **additional environmental sensors** in collaboration including on air quality (under trial), noise, and other environmental factors.

All services are provided in accordance with the InLinkUK Terms of Use and Privacy Policy, and are compliant with relevant privacy rules and regulations in the UK.

InLink design and technical information

To assist in improving the overall public realm of the area up to two non-listed BT payphones will be removed for each new InLink that goes in the ground, allowing us to **return hundreds of square meters of valuable pavement space** to the local community while preserving and enhancing the existing pedestrian network in the area.

InLinks themselves are free-standing structures featuring a fully accessible tablet interface and digital display screens on two sides, while the small ‘privacy wings’ give a sense of personal space without enclosures.

The InLink dimensions are 28cm deep and 89cm wide, with a height of 290cm to maximize the range of the ultrafast Wi-Fi while not dominating the street scene. A narrow 79cm base limits the footprint while ensuring access to wheelchair users and creating a slender appearance.

The InLink digital display screens automatically dim at night to 600cd/m^2 in accordance with the levels set for this type and size of screen (those under 10m^2) by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.

This dimming is based on a predetermined schedule of daylight hours which takes into account seasonal changes, ensuring the InLinks remain in harmony with the streetscape throughout the day and minimise disturbance to local residents during the evening hours.

InLinks are designed so they do not require feeder pillars in relation to their power supply, further limiting any potential impact on the nearby pavement area and pedestrian flows.

Similarly, InLinks are made for urban environments with their structure and foundations able to easily withstand being pushed by individuals or high winds. The overall structure is made to fall slowly should it be involved in a vehicle collision, with internal motion sensors included in each InLink that are designed to send automatic notifications in the event of such an incident.

Accessible for all types of users

InLinks have been designed to be accessible to all users, regardless of their physical or technological capabilities, including:

- The tablet interface placed at 121cm and angled at 15 degrees to provide easy access, including for wheelchair users
- Braille embossed information on all key features and the numbered keypad
- Easy touch 999 call button to ensure it can be used regardless of mobility restriction (includes two push approach to reduce the chance of accidental calls)
- High-contrast large type labels help the visually impaired
- Talkback functionality facilitates full access to the tablet for all users
- Hearing induction loops integrated into each InLink
- The touch screen interface is designed to feel familiar to consumer tablet products.

We will shortly be introducing Next Generation Text Relay on to the InLinks which will further support people with a disability using the InLinks.

Site Selection Criteria

Developed through experience, our Site Selection Criteria are used to find suitable locations for InLinks based on a range of considerations.

We look at, but are not limited to, the following for determining the most suitable location for bringing each InLink into a community:

- **Feedback**, with Councils and other stakeholders invited to give early suggestions
- **Pavement widths**, with preference given to locations with wider pavement areas
- **Street furniture**, with the aim to avoid clutter wherever possible
- **Heritage areas**, with care taken to avoid any negative impact

When determining which existing BT payphones to remove in connection with an InLink, we consider:

- **Feedback**, with potential locations sought from Councils and local stakeholders
- **Heritage significance**, including relevant heritage listings (e.g. K2 red boxes)
- **Pavement width**, with preference given to decluttering narrow pavement areas
- **Street clutter**, with preference given to reducing clutter in busy areas
- **Use and condition**, with underused or damaged payphones prioritized
- **Universal Service Obligation**, where BT is required to maintain payphone services which Ofcom requires

The Camden roll out

This application is part of a wider scheme of InLink implementation across the London Borough of Camden at this time. These proposals in Camden are part of the London-wide roll-out of sites.

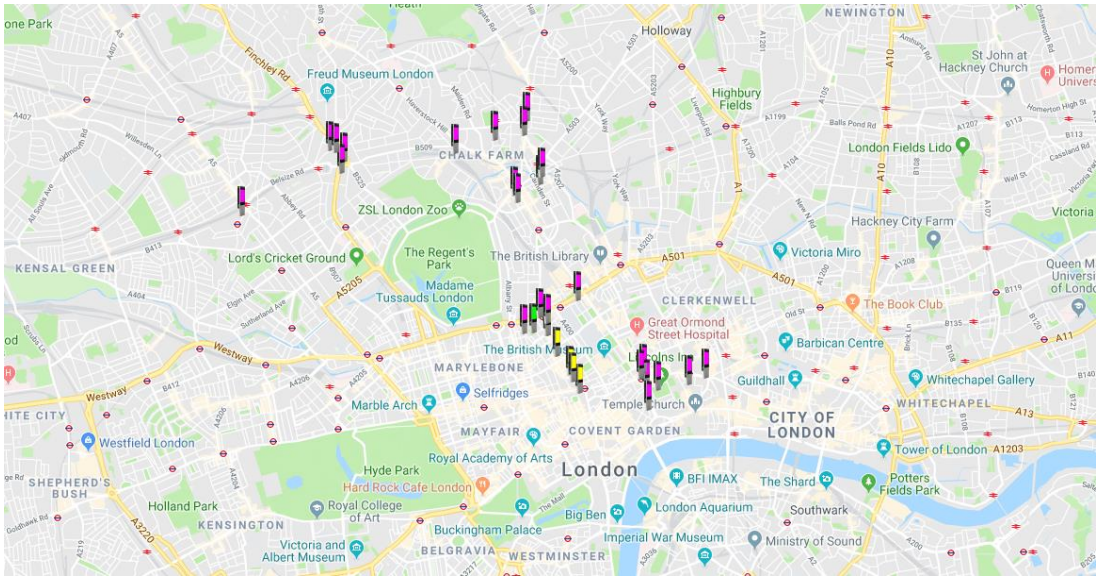

Fig 1. Shows the 8 proposed applications along with the existing 24 consents. This is detailed as follows: 24 Approved InLinks (purple). 7 Proposed InLinks on Tottenham Court Road (Yellow). 1 proposed InLink on Euston Road (Green).

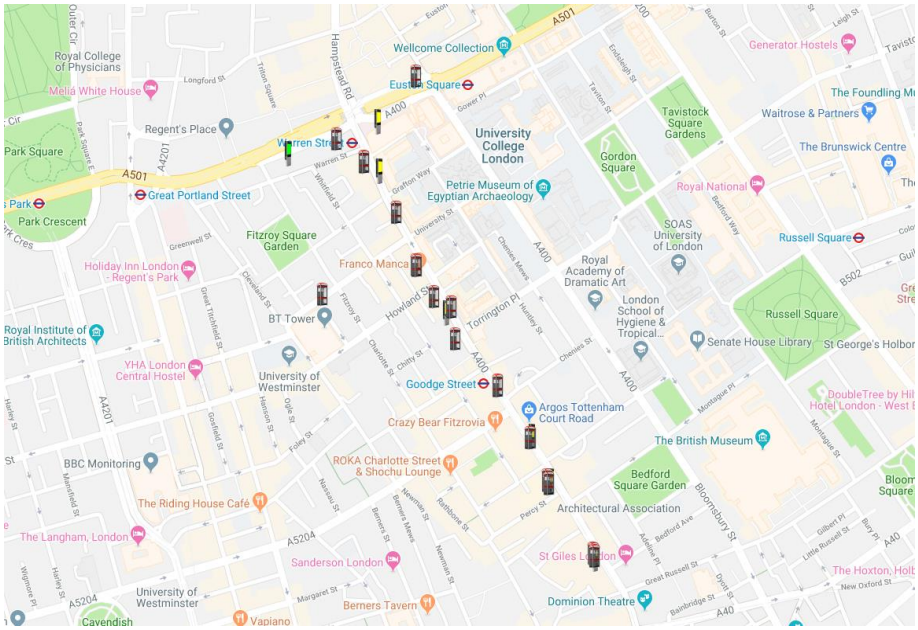

Fig 2. Proposed 8 InLink applications and associated 25 removals.

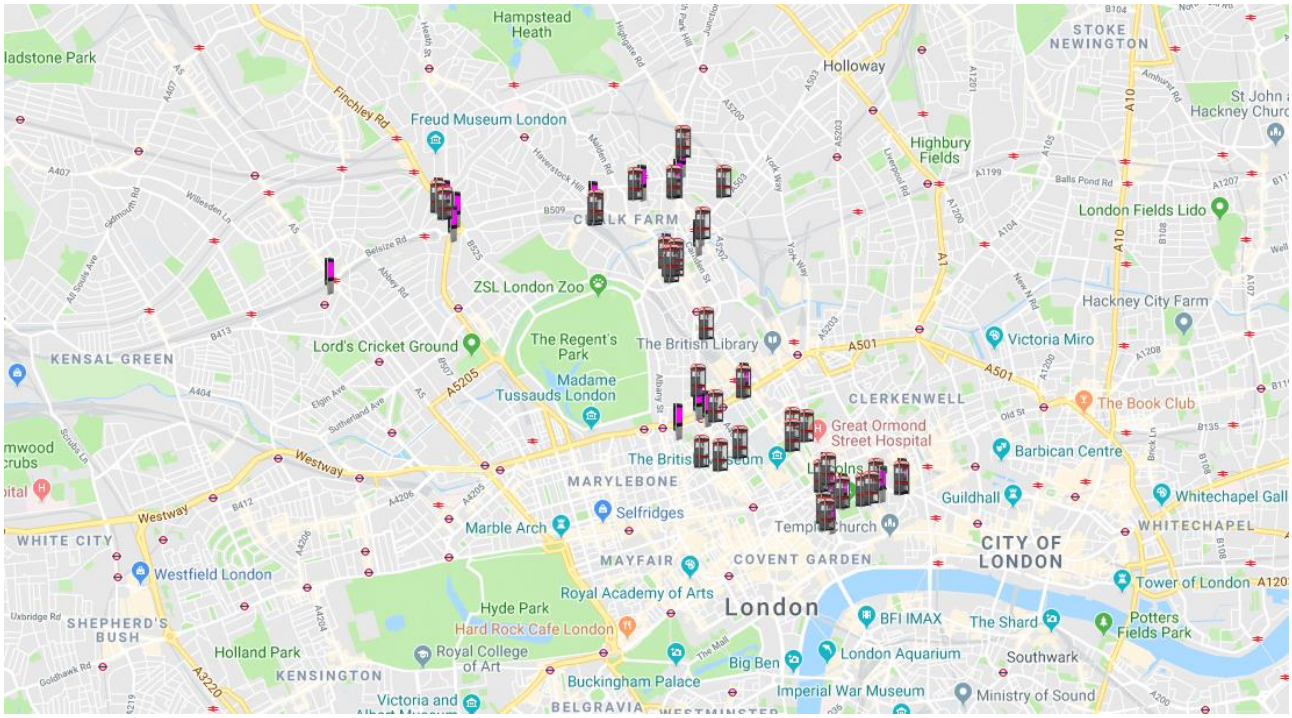

Fig 3. Approved 24 InLink Applications and associated 60 removals.

Aligned with planning policy

The application is for full planning permission under section 62 of the Town and Country Planning Act 1990 [the 1990 Act] and express advertisement consent under regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations].

Applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the 1990 Act).

As per regulation 3 of the Regulations, applications for express advertisement consent must be determined in the interests of amenity and public safety, taking into account (a) the provisions of the development plan, so far as they are material, and (b) any other relevant factors.

UK Digital Strategy

> *Digital connectivity is now a utility, and modern life is increasingly impossible without it. Connectivity drives productivity and innovation, and is the physical underpinning of a digital nation.*
>
> UK Digital Strategy 2017

Being connected is fundamental to success in our modern world and InLinks provide a cost-free way for communities to get online and take advantage of available opportunities.

> *Every individual and every business should have the skills and confidence to seize the opportunities of digital technology and have easy access to high-quality internet wherever they live, work, travel or learn.*
>
> *The Rt Hon Karen Bradley MP*
> *Former Secretary of State for Digital, Culture, Media and Sport (July 2017-Jan 2018)*

InLinkUK from BT is helping close the digital divide that still leaves too many Britons at a disadvantage. For example, 20% of Manchester InLinks will be in the most deprived 30% of local areas nationally enabling residents in these areas to access free wi-fi, as well as the other free services provided from the InLinks.

National Planning Policy Framework (2018) - England

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied and is considered to be a material consideration for both the [Planning Permission application and the Express Advertisement Consent application.

The NPPF supports the promotion of healthy and safe communities at section 8. The relevant policies are set out below:

> **Paragraph 91**
> Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.
>
> **Paragraph 92**
> To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (and other local services to enhance the sustainability of communities and residential environments.
>
> **Paragraph 95**
> Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security.

The NPPF supports the provision and promotion of sustainable transport at section 9. These relevant policies are set out below:

> **Paragraph 109**
> Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
>
> **Paragraph 110**
> Within this context, applications for development should: [...] c) create places that are safe, secure and attractive, which minimize the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

The NPPF supports the provision of high quality communications infrastructure at section 10. These relevant policies are set out below:

Paragraph 112
Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should priorities full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

Paragraph 113
The number of radio and electronic communications masts, and the sites for such installations, should be kept to a minimum consistent with the needs of consumers, the efficient operation of the network and providing reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.

Paragraph 115
Applications for electronic communications development (including applications for prior approval under the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development.

Paragraph 116
Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.

The NPPF states the following specifically in relation to advertisement control:

Paragraph 132
The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

The London Borough of Camden Local Planning Policy.

The London Plan 2016

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The following policies are considered relevant:

Policy 4.11 – Encouraging a connected economy (Strategic A):

The Mayor and the GLA Group will, and all other strategic agencies should

a) facilitate the provision and delivery of the information and communications technology (ICT) infrastructure a modern and developing economy needs, particularly to ensure: adequate and suitable network connectivity across London (including well designed and located street-based apparatus); data centre capability; suitable electrical power supplies and security and resilience; and affordable, competitive connectivity meeting the needs of small and larger enterprises and individuals

b) the use of information and communications technology to enable easy and rapid access to information and services and support ways of working that deliver wider planning, sustainability and quality of life benefits.

Mayor of London Transport Strategy 2018.

Policy 23 (under Principles for new transport services and technology)

The Mayor, through TfL, will explore, influence and manage new transport services in London so that they support the Healthy Streets Approach, guided by the following principles:

e) Creating a safe, attractive environment on our streets: new services and technology should help create a safer, quieter and more pleasant environment on London's streets, where it is more attractive to walk or cycle, and should not lead to existing active trips being made by nonactive modes. There must always be an emphasis on the safety of passengers, people walking and cycling, and other road users. Where this involves introducing technology directly into the street, it should be done in a coordinated way that enhances the overall character of the street, reduces clutter, and does not prevent future potential re-allocation of space for walking, cycling and public transport.

The London Borough of Camden Local Plan 2017 superseded the Camden LDF in July 2017.

The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). It ensures that Camden continues to have robust, effective and up to-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities. The Local Plan will cover the period from 2016-2031.

Camden's Digital Strategy sets out a series of actions to support the uptake of high quality, next generation connectivity. This includes better connections for businesses and residents already on-line, tackling the 'digital divide' where people lack the confidence to use IT and the greater use of digital technology in delivering services.

It is considered that InLinks support the Camden Digital Strategy in the following ways:

- *Developing new solutions with partners to reduce inequality – All services on InLinks are free, opening up the opportunities of digital connectivity to all residents and visitors equally.*

- *Creating the conditions for and harnessing the benefits of economic growth – The free services on InLinks are funded by advertising revenue, providing a public benefit as well as economic benefit to the service provider.*

- *Investing in our communities to ensure sustainable neighbourhoods – The investment provided by InLinkUK will directly benefit the communities that it covers, both in terms of the services provided and the visual improvements to the local amenity through upgrading to InLinks and reducing the number of existing, traditional payphones.*

Policy D1 Design

- Good design is essential to creating places, buildings, or spaces that work well for everyone, look good, last well and will adapt to the needs of future generations. The National Planning Policy Framework establishes that planning should always seek to secure high quality design and that good design is indivisible from good planning.

- Policy D1 Design the Council will seek to secure high quality design in development. The Council will require that development:

- Local context and character 7.2

The Council will require all developments, including alterations and extensions to existing buildings, to be of the highest standard of design and will expect developments to consider:

Character, setting, context and the form and scale of neighbouring buildings;

- The character and proportions of the existing building, where alterations and extensions are proposed;
- The prevailing pattern, density and scale of surrounding development;
- The impact on existing rhythms, symmetries and uniformities in the townscape;
- The composition of elevations;
- The suitability of the proposed design to its intended use;
- Inclusive design and accessibility;
- Its contribution to public realm and its impact on views and vistas.

Policy E1 Economic development, Digital infrastructure.

- The Council recognises the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises.

The development of InLinks can help this by:

- *Providing opportunity to get closer to communities and for residents to feel connected to the Council – InLinks will provide residents access to council and other essential services.*
- *Supporting the delivery of consultation by the Council – There is the potential for innovative access to decision-making and to reach seldom-heard groups.*
- *Helping to make Camden a place where people feel safe - InLinks offer 24/7 emergency services, as well as a display network on which to share key information in the event of an emergency or disaster.*

The Council recognizes the importance of digital infrastructure in enterprise development and expects electronic communication networks, including telecommunications and high-speed broadband, to be provided in business premises.

Policy G1 Delivery and location of growth states:

- Securing the infrastructure and services to meet the needs of our growing number of residents, workers and visitors. We have identified our infrastructure needs in the schedule in Appendix 1. This includes transport, utilities, education, health, open space, emergency services need and digital infrastructure requirements.

Policy D2 Heritage.

The Council will preserve and, where appropriate enhance Camden's rich and diverse heritage assets and their settings, including:

- Conservation areas;
- Listed buildings;
- Archaeological remains;
- Scheduled ancient monuments;
- Historic parks and gardens;
- Locally listed heritage assets.

Policy D4 Advertisements

The Council will require advertisements to preserve or enhance the character of their setting and host building. Advertisements must respect the form, fabric, design and scale of their setting and host building and be of the highest standard of design, material and detail. We will support advertisements that:

- Preserve the character and amenity of the area; and
- Preserve or enhance heritage assets and conservation areas.

Siting justification against planning policy

As noted previously, the siting of each InLink in the network across the borough has been considered having regard to the visual character of the street scene, impact on heritage assets, overall scale of development, pavement width, local setting and social context and public safety. These criteria have been adjusted where necessary on a site by site basis to account for local policy requirements. Justification of the siting of the proposed InLink is detailed below against the local policy requirements:

Character of the local street scene/context, scale of development and appearance and impact on amenity (NPPF para. 132, para 132, D1, D2, D4).

The subject site is located on Tottenham Court Road on the pavement outside No.39. The local street scene is predominately commercial in character with retail and other commercial uses at ground level. The proposed structure would not appear incongruous in the above context. The proposed InLink is slightly taller than the existing payphones in close proximity but is narrower with a more streamlined and accessible design. The two advertising screens form part of the structure design and are smaller than the advertising panel associated with the traditional payphones. In visual terms, at street level, there would be no significant change in the outlook of the area however, the InLink in being less bulky and having significantly smaller display screens will be less visually imposing. Taking into consideration the existing payphone with advertising and commercial setting, it is not considered that the proposed development would result in material harm being caused to the amenity of the area given the small size of the proposed structure and associated advertising screens. In addition, because the proposed InLink has a simpler and more modern design it would improve the visual appearance of this part of the street scene.

Conclusion

InLinkUK has the potential to significantly enhance the provision of local community communications facilities and services (Sec. 10 of NPPF and London Plan Policy 4.11).

InLinks are of a high quality, accessible design that would be a revolutionary improvement over the existing kiosks (D1).

The application InLink would be located within an appropriate context (NPPF para. 132,D1, D4); it would reduce street clutter (D1,D4); it would maintain sufficient footway widths and visibility splays (NPPF, D1,D4); would not adversely affect heritage assets (NPPF,para 132, D2); and, would not otherwise adversely affect amenity or public safety.

Therefore, the proposal is considered to be accordant with the relevant policy framework and would not adversely affect amenity or public safety. As such, it is considered that Planning Permission and Express Advertisement Consent should be granted.

Recommended Conditions of Consent

To give assurance each InLink will operate as intended and the associated payphone removals will occur, we recommend the following conditions (or a version there of) be included as part of any planning consent:

A. *Within three (3) months of development commencing the existing BT payphones shown on [DOCUMENT REFERENCE] shall be removed in their entirety and the land made good to the same condition as the adjacent land.*

B. *Pavement surrounding the InLink shall be made good to the same condition as the adjacent land.*

C. *The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m2) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*

D. *The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*

E. *The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*

F. *The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.*

G. *No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*

Digital Display Screen Technical Specification

The technical specification of the two digital display screens are as follows.

Screen Panel Type:	LCD
Screen Dimensions:	69cm wide x 121cm high (55 inch in portrait)
Screen Area:	**0.835m²**
Resolution:	1920(RGB)×1080 , FHD
Maximum Daytime Brightness:	2500 cd/m² (Typ.)
Maximum Nighttime Brightness:	**600 cd/m² (Typ.)**
Contrast Ratio:	5000:1 (Typ.)
Display Colours:	16.7M (8-bit) , CIE1931 72%
Viewing Angle:	178/178 degrees
Lamp Type:	WLED
Operating Temperature:	0 ~ 50 °C
Sunlight Readable:	Yes

The proposed usage for the screens has been set in accordance with Transport for London's (TfL) policy document 'Guidance for Digital Roadside Advertising and Proposed Best Practice – 2013' [the TfL Guidance].

In addition to the above conditions, each InLink location has been assessed against and would comply with the following additional criteria from the TfL Guidance.

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.
- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m²) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.