Planning, Design, and Access Statement

Proposal

Full Planning Permission and Express Advertisement Consent is sort for the removal of 4no. KX100 telephone kiosks and the installation of 1no. InLink.

InLink Site

Tottenham Court Rd (OS No.220 Maplin)

Lat/Lon: 51.51968, -0.13327466

Our Ref

CMD-204

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About us

InLinkUK is a London-based joint venture between technology company Intersection and Primesight, a leading UK out-of-home media company.

We work in exclusive partnership with BT in the UK to support them using their connectivity to ensure communities are well-served in the digital age through the roll out of InLinks to replace and rationalise their network of payphones.

Locally ‘InLinkUK from BT’ have been collaborating with councils throughout the UK on the installation of InLinks and the removal of non-listed BT payphones. Since June 2017 we have had more than 86 InLinks already go live with hundreds more in the coming months expected throughout central areas of London, Leeds, and other major cities around the UK.

In doing so we are creating a service to revolutionise streetscapes and helping deliver the fastest and most robust free public Wi-Fi service in the UK.

At no cost to taxpayers or end users, InLinks provide communities with an unprecedented suite of essential urban tools, including free ultrafast Wi-Fi, phone calls, wayfinding, device charging, an emergency 999 call button, public messaging capabilities, and a platform for interactive technologies on the streets such as air quality monitoring.

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What is an InLink

InLinks are a community structure helping to connect and improve local streets. At no cost to taxpayers or end users, InLinks provide communities with an unprecedented suite of essential urban tools:

- **Free ultrafast Wi-Fi with speeds up to 1 Gb per second within 100m** of each InLink, with more than 40,000 people having already subscribed, which as of last month saw them use enough data to view over 63 million different webpages
- **Touchscreen tablets** to access council services, BT's phone book, maps and directions, with more than 14,000 tablet sessions every week
- **Accessible** in design including hearing induction loops, braille embossed and TalkBack functionality in the tablet
- All InLinks are powered by **100% renewable energy**
- The InLinkUK team provide **bi-weekly cleaning** and the ability to rapidly respond on an as-needed basis to any issues monitored by sensors in the InLinks
- With a **footprint of just 0.22m^2** InLinks are smaller than any comparable street furniture, and their installation also facilitates and **funds the removal of two existing BT payphones** giving back 1,78m^2 for each installation
    - This **allows us to give back pavement space** to local communities which so far is equivalent to install 59 street trees, 197 litter bins or 122 bicycle parks
- **438 hours of council content** on the screens of each InLink per year to promote local initiatives, news, and events
- Over 1,000 hours per year of hyper-local content allowing 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** to UK mobile, local or national numbers, including the option to plug in your personal headphones for more privacy, with ~15,000 free calls already made each week

- **Direct 999 call button** with location sharing two-press approach to limit accidental activation

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

A range of factors are considered when choosing the site for each InLink, including Council and community feedback, pedestrian and vehicle flows, visual character of the street scene, proximity to sensitive heritage assets, pavement widths, surrounding land uses and social context in accordance with local policy requirements.

As an amenity for the public, InLinks have a recognisable identity that makes them easy to spot, and yet each fits into its local environment, being visually unimposing and claiming minimal space.

Awards and community feedback

InLinks are an award-winning design that are sensitive to their context both in terms of the built environment and the people who use it.

"Fast connectivity isn't merely a nice thing to have, it makes a real difference to people's lives."

Matt Hancock, MP Secretary of State for Digital, Culture, media and Sport

"Even better than the internet I can get at home."

Jess, London

"It's really exciting to see this kind of innovation coming to Leeds. Why don't we have more of them?"

Matthew

InLink roll out programme

Our approach to planning has always been collaborative with Councils to look at the roll out of the InLinks to improve the street scene through a process of rationalisation of the existing BT payphone estate.

Our teams work closely with local authorities and other relevant local stakeholders to identify suitable sites for InLinks and to select which payphones are to be removed.

Once the appropriate permissions have been gained for the installation, we progress with removals and installations with the minimal possible disruption to the local residents and businesses.

We have designed the activation of the units to be as automated as possible to minimise the time requirements for our engineers to set-up and prove that the units are ready for service.

As part of this approach we welcome the opportunity to collaborate on all stages of the roll out in an area wherever possible.

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.

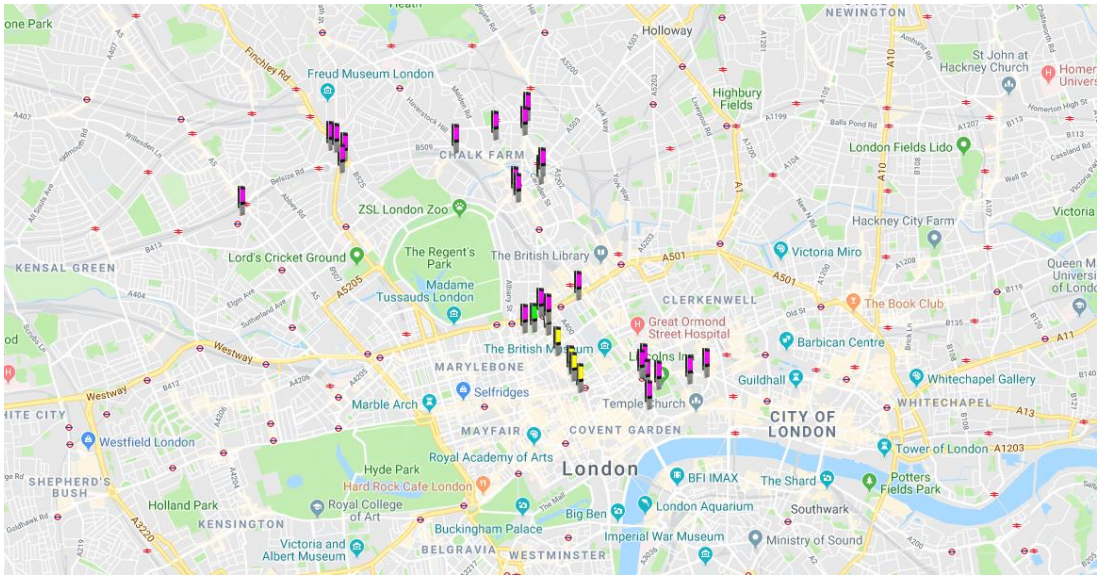


Fig 1. Shows the 8 proposed applications along with the existing 24 consents. This is detailed as follows: 24 Approved InLinks (purple). 7 Proposed InLinks on Tottenham Court Road (Yellow). 1 proposed InLink on Euston Road (Green).

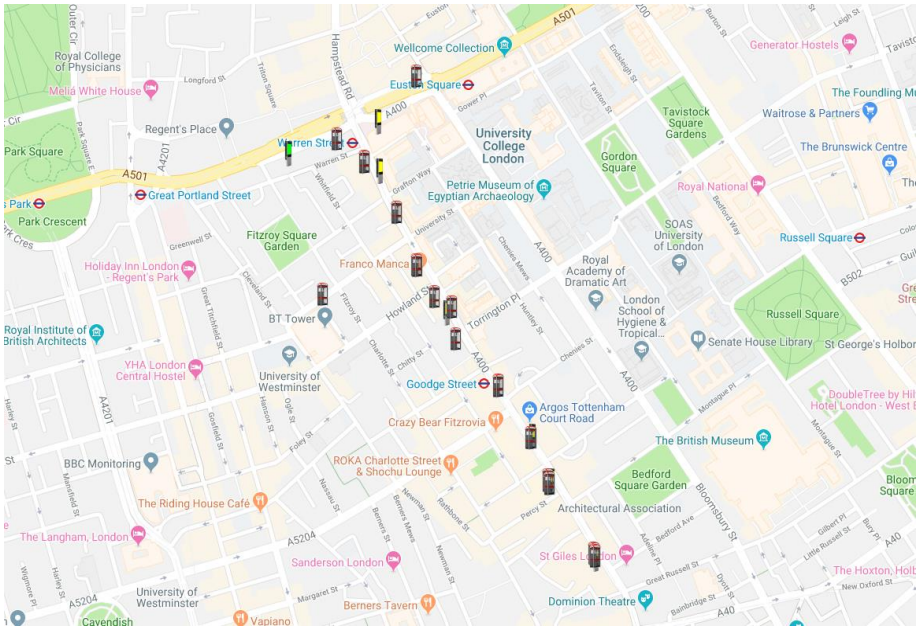


Fig 2. Proposed 8 InLink applications and associated 25 removals.

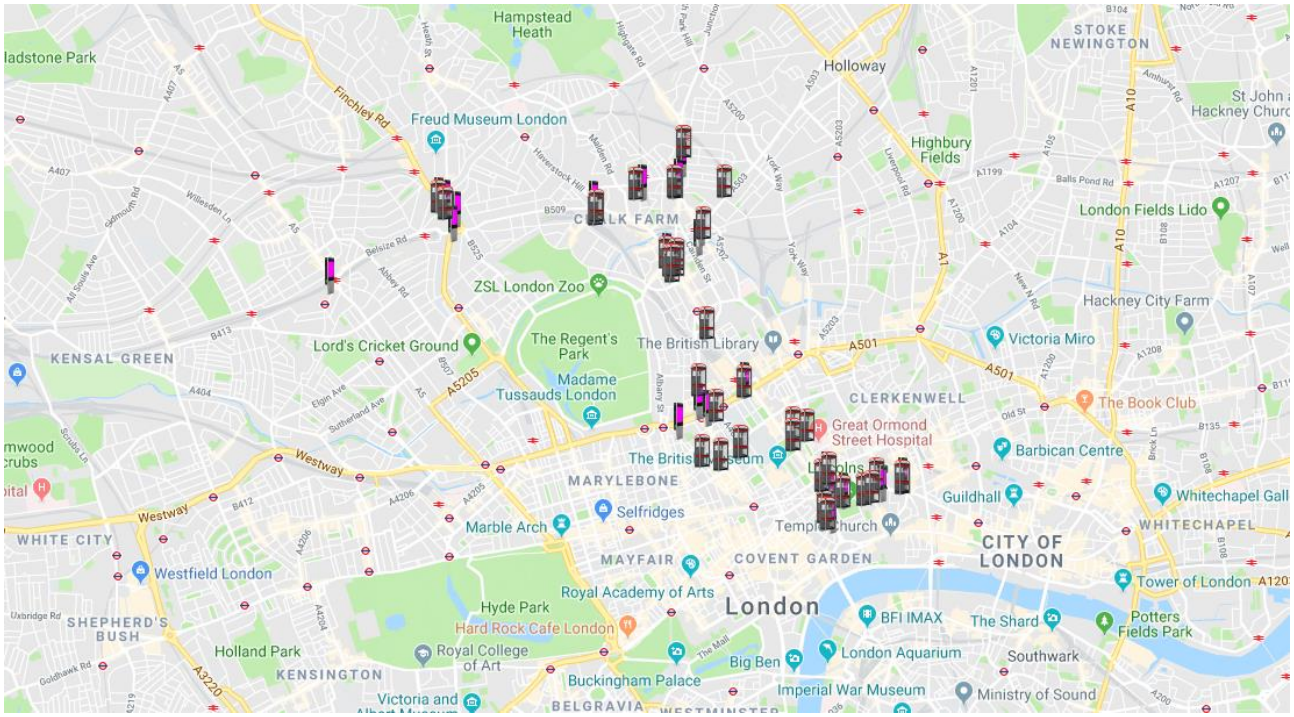


Fig 3. Approved 24 InLink Applications and associated 47 removals.

InLink design and technical information

The partnership between InLinkUK and BT is putting digital services on the street to help people and communities become better connected.

As part of this and funded through their installation, at least two non-listed BT payphones will be removed for each new InLink, allowing us to **return hundreds of square meters of valuable pavement space** to local communities and councils.

InLinks themselves are free-standing structures featuring digital display screens on two sides and a user interface based around an android tablet. The overall dimensions are 28cm deep, 79cm wide at ground level, 89cm wide at the top of the unit, with a height of 290cm. The narrower base reduces the street footprint further and gives a slender, elegant appearance.

In designing InLinks, the team have taken a user-centred approach: from the creation of an inviting, accessible, physical and digital design to the easiest-to-use and fastest public Wi-Fi available anywhere in the UK, to creating a valued advertising programme in harmony with its surroundings that will set the standard for quality content and context relevance.

The touchscreen looks up, welcoming the user, while the small “privacy wings” give a sense of personal space without enclosures that invite antisocial behavior.

Integrated lighting above the interface panel illuminates this area, giving a sense of comfort and safety to the user when it is dark.

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 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 unit
- 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.


PAW Patrol

Connectivity through gigabit Wi-Fi

InLinks connect their communities to the fastest and most robust free public Wi-Fi service in the UK, full fibre connectivity enables speeds **up to 27 times faster than standard broadband**[1] and connections able to handle large numbers of users without any reduction in speed.

Signing up is done through a **one-time email address registration** which then connects automatically whenever a user is in range of an active InLink. We do not sell these email addresses on, and have a customer-first policy to create the best experience possible for our users.

Each InLink also has in place content filtering, so accessing websites that are only suitable for adults will not be possible through our service.

Our Privacy Policy can be viewed at: http://www.inlinkuk.com/privacy-policy

[1]Note: Actual performance will depend on a range of factors including but not limited to device performance and radio interference

Comparable Download Speeds

	InLink Wi-Fi (up to 1Gbps*)	**Proposed UK Broadband Universal Service Obligation** (10 Mbit/s)	**Average UK Download as per figures from Ofcom** (36.2 Mbit/s)
5 minute video (30MB approx.)	**0.24 seconds**	25 seconds	6 seconds
45 minute TV show (200 MB approx.)	**1 second**	3 minutes	46 seconds
2 hour film (1,00MB approx.)	**8 seconds**	14 minutes	4 minutes
2 hour HD film 4,000MB approx.)	**33 seconds**	56 minutes	15 minutes

Interactive tablet

Every InLink gives access to maps, directions, and city services from an easy-to-use touchscreen tablet. The tablet uses the popular Android operating system, which provides a series of ‘tiles’ that give access to:

- A link to the local council website
- BT’s phone book
- Maps and wayfinding
- FAQs and instructions
- And much more!

InLink tablet sessions timeout after 30 seconds of inactivity or when selected, wiping all user sessions clean.

The open source licensing of this system also ensures continued support and advancement over the next decade. We will also look to work with partners to develop new apps to provide meaningful, local information.

The tablet is a ring-fenced system that does not allow open web browsing.

Free calls for everyone

InLinks allow users to make free calls to mobile, local and national phone numbers using two different methods:

- Using our directional speaker and built in microphone, equipped with noise-cancelling technology and an adjustable volume, to make calls that rival a traditional handset in clarity and quality

- By plugging in a standard headset or earphones into the built-in headphone jack in for additional privacy

The tablet and speaker are set back into the InLink and sheltered from the sides, allowing for a comfortable level of privacy for personal communications. In addition, the speaker volume is automatically reduced at night (except for emergency calls)

For international calling, users can purchase a calling card readily available at retail stores across the country.

Safer communities

Every InLink includes a **direct 999 call button** that that connects users in an emergency to the relevant services.

When used, the call button **automatically shares the location** of the InLink with the authorities.

The design of the button is a two push approach to reduce the chance of accidental calls; the first time a voice confirms that the user wish to call the emergency services, prompting them to push the button a second time to confirm.

The InLinks can also support campaigns with local police and other authorities. For more information see the communities section below.

Secure fast charging

Each InLink includes **two marine grade, waterproof USB ports** featuring Quick Charge 2.0. The USB ports are connected directly to a power source only and cannot exchange data between devices and the InLink.

These USB ports are compatible with all mobile devices, but unlike traditional USB charging, they **also support the next generation of phones** with 20X the charging speed.

Users with compatible devices can get a **10% charge in under three minutes**, a great service to tourists and those in an emergency who may need to charge their personal devices.

Digital screens that dim at night

InLinks screens show a set of rotating content, serving as a key point of reference for local information and as an asset to the community.

InLink **digital screens dim at dusk** so they remain in harmony with the streetscape throughout the day and minimise disturbance to local residents. We continue to work with our technical teams to ensure the screen brightness meets community expectations at all times.

Outside of the allocations for community and council content (see below), we anticipate the screens will showing commercial content from businesses, including local SME's, helping fund the range of InLink services being provided to the local community

InLinkUK's designers also create 'house content' throughout the year relating to key events and holidays e.g. Black History Month, community events and meetings, Christmas and Valentine's Day.

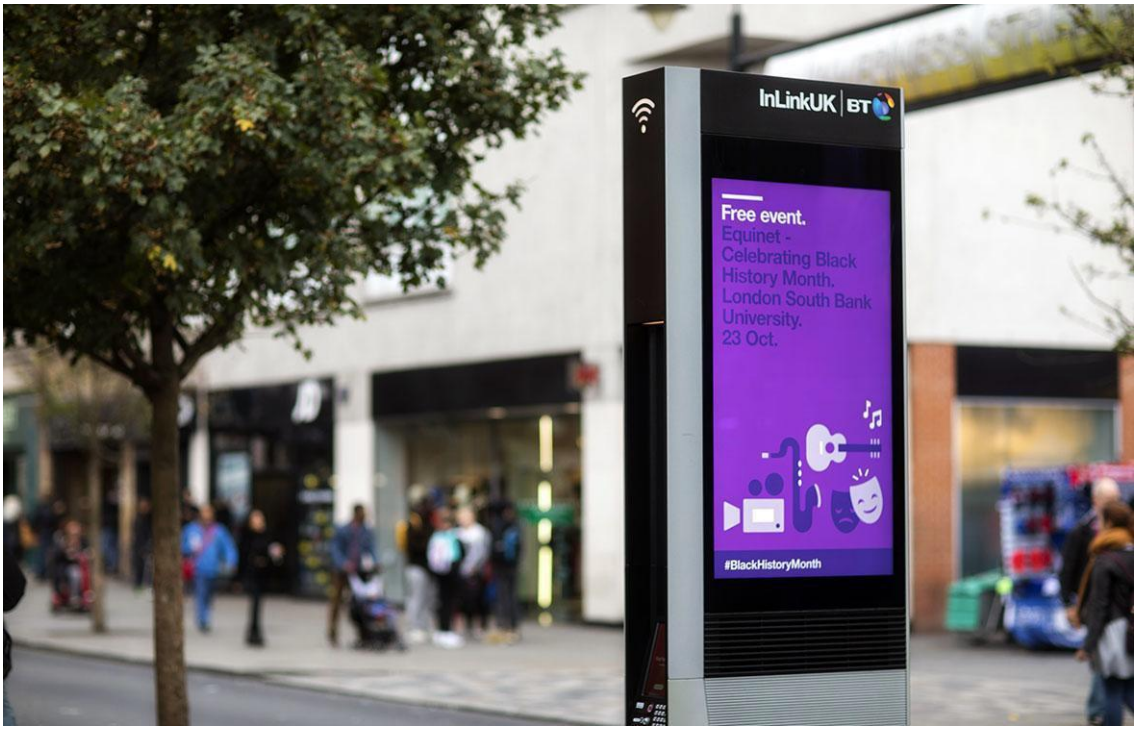
For full specifications of our screens please refer to the 'Proposed Schedule of Operating Conditions for InLinkUK Advertising Screens' included below.

Environmental performance

All InLinks are **powered by 100% renewable energy**, with energy efficiency prioritised throughout the design process.

Our design incorporates the following energy-saving strategies:

- A state-of-the-art LED-backlit LCD screen that consumes approximately 60% less power than Cold Cathode Fluorescent Tubes
- Filters on the screens reflect light reducing the need for high power, noisy cooling systems typically seen in competing solutions
- Industrial-grade components designed to function at high temperatures lower the need for cooling without compromising performance
- Passive design for cooling where applicable, along with the use of aluminum for better thermal dissipation
- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.



Materials and maintenance

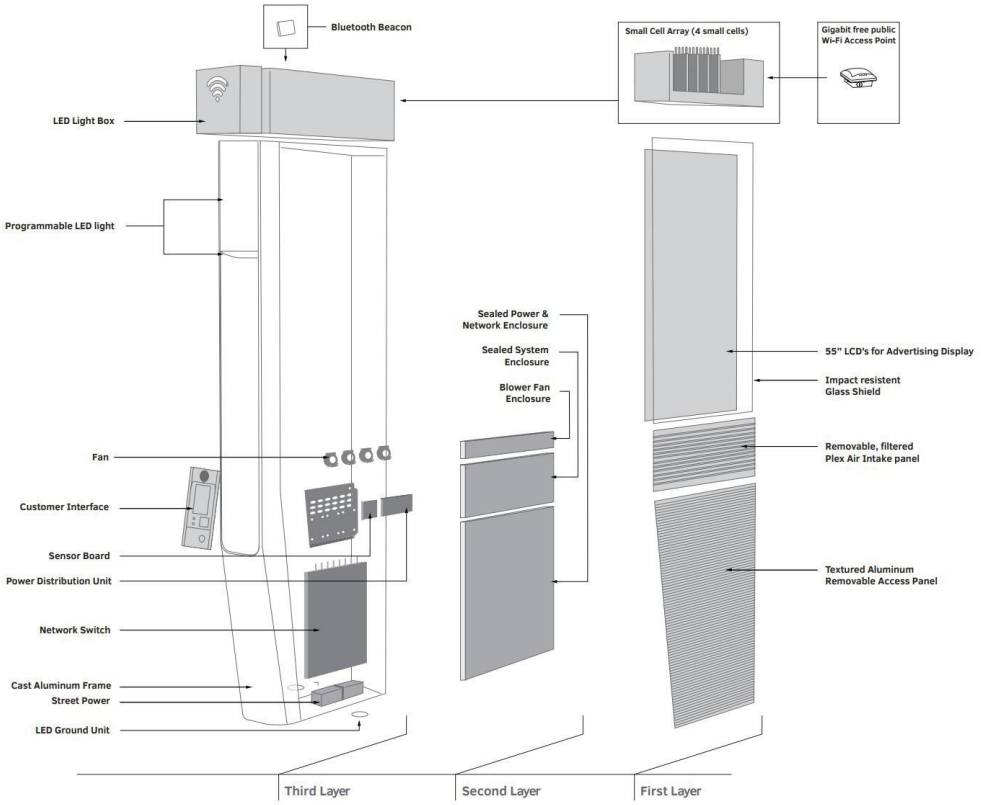
Maintainability and durability were key considerations in the design of the InLink, with each cleaned every two weeks with additional servicing provided as required through our ongoing support processes.

The main casing of an InLink is cast aluminum, a material which is attractive, durable, easy to service and conducive to cooling internal components.

The large displays are fronted by tempered and laminated glass, and interface panels and vent areas are painted powder-coated aluminum. These high quality materials ensuring the longevity of the InLink by enabling them to hold up to abuse and vandalism, and diminish the appearance of scratches.

The modular design of exterior and interior components means that servicing damages or basic wear and tear is simple and economical. The InLink design has also removed the handset that is frequently vandalised on older designs.

We are committed to the maintenance and cleaning of InLinks at each location to keep them in a condition to which we are proud and encourage users to enjoy them.


Bluetooth Beacon
Small Cell Array (4 small cells)
Gigabit free public Wi-Fi Access Point
LED Light Box
Programmable LED light
Fan
Customer Interface
Sensor Board
Power Distribution Unit
Network Switch
Cast Aluminum Frame
Street Power
LED Ground Unit
Sealed Power & Network Enclosure
Sealed System Enclosure
Blower Fan Enclosure
55" LCD's for Advertising Display
Impact resistent Glass Shield
Removable, filtered Plex Air Intake panel
Textured Aluminum Removable Access Panel
Third Layer
Second Layer
First Layer

Emergency messaging

The digital screens and the back-end systems allow us to control the screens dynamically through our head office.

In the event of an emergency or major event, this has the potential to allow us to stop content or advertising and place urgent, useful messaging on to the dynamic screens alerting members of the public to major incidents which will impact them.

Given that each InLink is addressable, we can give very specific instructions on each unit—for example, steering people away from a particular area and providing alternatives to travel.

This feature is currently under development with updates to be provided as it progresses.

Smart city sensors, data, and the Internet of Things

InLinks have been designed with the ability to collect useful, real-time data and insights from the communities they are in to help government officials and local decision makers make the most of the space around them.

The modular nature of the build of InLinks allows us to evaluate and invest in the best tools and techniques of collecting meaningful insights for the community as sensor technology evolves.

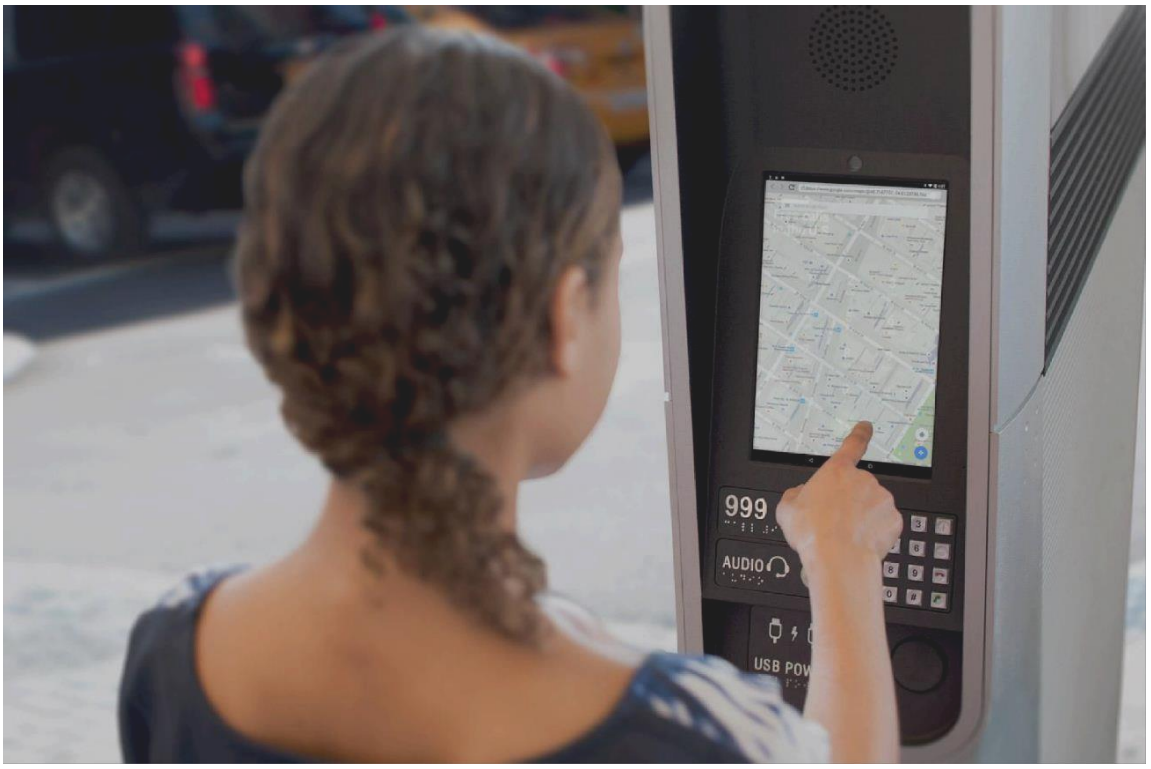
We are anticipating introducing sensors that can anonymously monitor things like:

- Air quality monitoring (currently being trialed)
- Pedestrian movement
- Traffic movement
- Bike and vehicle counting
- Environmental factors like sound and light

And through continued investment, we will continue to explore what other smart city sensor and data information we can provide to improve public well being and health in cities.

This kind of **data is most powerful when shared**, and we would look to make these urban insights readily available to the community.[2]

[2] Within the constraints of our Privacy Policy


999
AUDIO

Content standards

Primesight work closely with the advertisers, brands and specialist, and any advertisement on the InLink screens comply with the Committee of Advertising Practice (CAP) Code of Practice.

Primesight also work within the guidance provided in the Guidance for Digital Roadside Advertising and Proposed Best Practice from Transport for London and resources from other authorities as necessary.

Primesight are also guided by the UK code of Non Broadcast Advertising and Direct Promotional Marketing (CAP) Self Regulation Guidelines.

For full specifications of our screens please refer to our '*Proposed Schedule of Operating Conditions - InLinkUK Advertising Screens*' included below.

Useful real-time information

We are currently running real-time information from a range of sources, including local weather and transport information.

In London we display real-time Transport for London (TfL) tube status information, and are exploring with TfL how we might be able to incorporate other transport information to help people get around the city.

In the future we are looking for other open API's to allow us to create further localised content relevant to the community. Similarly, we welcome the opportunity to work with local authorities, transport providers, and others to determine what real-time information is most useful to the area and how it can be integrated into the InLinks.

Allocation for community and council content

The rotating content on each InLink includes an allocation for community content provided by the local council and community.

Camden will be provided with 5% of screen time on each InLink to promote and educate. This allocation is equivalent to 438 hours of screen time on each InLink every year.

This content would be scheduled and (where needed) developed in partnership with InLinkUK and Primesight, and can tell residents and visitors about local services, local events and news, as well as warnings and public notices.

InLinks are more than just an advertising screen— they are already a key point of reference for local information and as **an asset to the community**.

Advertising for businesses of all sizes

InLinkUK represents **the latest in advertising platforms**, and with locations positioned to uniquely partner with local businesses. An example is included below from The Camden College.

To best support local small businesses, we have developed an affordable, accessible digital advertising solution that specifically targets InLinks close to their location.

The Primesight sales team (who are responsible for all of the paid for messaging that appears on InLink screens) is setup to **work in partnership** with businesses classified as Small and Medium-sized Enterprises to enable these partners to use the screens to reach the audiences they need to drive business growth.

The revenue made from advertising allows us to provide all of our services free of charge to communities, as well as further the InLink roll out.

Outside of what is available today, Primesight is looking at innovative ways to work with clients on this new platform to leverage its digital capabilities to create more dynamic content for the InLink screens, including the ability to leverage real-time data sources such as weather to power advertiser creative.

Site information

SSP Ref	CMD-204
Address	Tottenham Court Rd (OS No.220 Maplin)
Postcode	W1T 7PX
Lat/Long	51.51968, -0.13327466
Conversion/New Site/Relocation	Conversion
TfL Red Route	N
Conservation Area	Bloomsbury Conservation Area and opposite Charlotte Street Conservation Area
Proximity to Statutory Listed Buildings	N/A

Pre-application consultation and key stakeholder engagement

This application is one of six being submitted together specifically located within the area of Tottenham Court Road covered by the West End Project. The West End Project (WEP) is a large public realm project, investing £35m to improve the Tottenham Court Road area. InLinkUK has been in consultation with the Council on the replacement of the existing BT payphones within the project area with a number of InLinks since January 2017. In April 2017, InLinkUK met with Kevin Stears (West End Project, Project Manager) to discuss appropriate locations. As a result of this meeting, ten locations were agreed to be appropriate by the West End Project Team. These ten proposals were submitted to the Council's Planning Team under a formal pre-application submission. Following subsequent meetings and formal pre-application feedback, six proposals have been prepared for planning submission, of which this application is one. A full list of the six proposed InLink locations and associated BT payphone removals is detailed in the attached schedule.

The planning submission

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 218-219 at Maplin. The site currently accommodates a payphone with an advertising panel. 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.

Appendices

About BT

BT is one of the world's leading communications services companies, serving the needs of customers in the UK and across the world, where they provide fixed-line services, broadband, mobile and TV products and services as well as networked IT services.

In the UK they are a leading communications services provider, selling products and services to consumers, small and medium sized enterprises and the public sector.

They also sell wholesale products and services to communications providers in the UK and around the world. Globally, they supply managed networked IT services to multinational corporations, domestic businesses and national and local government organisations.

Website: http://www.btplc.com/Thegroup/Ourcompany/

Proposed Schedule of Operating Conditions – InLinkUK Advertising Screens

The technical specification of the advertisement screens are as follows.

Screen Panel Type:	LCD
Panel Size:	55 inches
Resolution:	1920(RGB)×1080, FHD
Maximum Potential Brightness:	2500 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 Conditions

Operating Temperature:	0 ~ 50 °C
Sunlight Readable:	Yes
Landscape or Portrait:	Landscape / Portrait (Link fixed in Portrait)

The proposed usage regime 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].

The recommended conditions are as follows:

1. The luminance of the digital sign shall not exceed the equivalent of 600 candelas per square metre 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'.

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

3. The minimum display time for each advertisement shall be 10 seconds.

4. The interval between advertisements 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.

5. No advertisement displayed shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

In addition to the above, each proposal 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 would be within the guidance contained in the Institute of Lighting Professional (ILP) Technical Note 5. Each display features automatic luminance adjustment.

Dusk to dawn levels would be limited to 600 c/m2 and daytime levels adjusted automatically as per the guidance, up to a maximum potential brightness of 2500c/m2.