

Planning, Design and Access Statement

Our Ref	BT6-HLG-006
InLink Address	High Street (Outside No. 91-93), Ruislip
Postcode	HA4 8JB
NGR	E509309 N187285
Project Type	BT InLink
Conservation Area	Ruislip Village Conservation Area
Statutory Listed Buildings	No
TfL Red Route	No

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 deliver the 'InLinkUK from BT' service through the removal of existing payphones and the installation of InLinks to improve the amenity of local streets and connectivity of communities in urban areas.

As part of our collaborative approach to connecting and improving local streets, **Prior Approval and Express Advertisement Consent is sought for the removal of one (1) existing BT payphone and the installation of one (1) InLink with excess space returned to the community** based on the following sites:

Install High Street (Outside No. 91-93), Ruislip, HA4 8JB	Proposed Removal 1 High Street (Outside No. 91-93), Ruislip, HA4 8JB
	

The 'InLinkUK from BT' service is available free of charge to everyone and is funded through the display of static digital advertising on the two comparatively smaller screens (in relation to bus stops and other digital kiosks in the area) in conjunction with other council and community content. These InLink screens automatically dim at night to 600cd/m² in accordance with the levels set for this type and size of the screen (those under 10m²) by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.

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.

This would achieve a significant overall reduction of development within the pavements of the area and in relative terms the proposed InLink would constitute a more modern and aesthetically pleasing addition that would assimilate well into the street-scene.

We would look to work with the Council to determine which removals should be conditioned as part of any subsequent planning approvals. A proposed condition is included at the end of this document 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 the London Borough of Hillingdon and aligned to the UK Digital Strategy, the National Planning Policy Framework and Hillingdon Development Plan.

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

What is an InLink

InLinks are a fully-accessible community structure helping to 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:

- **Free ultrafast Wi-Fi with speeds up to 1 Gb per second within 100m** of each InLink, with more than 100,000 unique users having already subscribed, which as of last month saw them use enough data to view over 168 million webpages
- **Touchscreen tablets** to access council services, BT's phone book, maps and directions, with more than 25,000 tablet sessions every week from our users
- **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 at night in accordance with the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements
- The InLinkUK team provide **bi-weekly cleaning** and the ability to rapidly respond on an as-needed basis to feedback and any issues monitored by sensors in the InLinks
- With a **footprint of just 0.22m²** 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 1.78m² for each installed
 - So far we have given back pavement space to local communities equivalent to install more than 135 street trees, 450 litter bins or 280 bicycle parks
- **438 hours of council content** on the screens are provided to the Council on each InLink per year to promote local initiatives, news, and events
- 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** to UK mobile, local or national numbers, including the option to plug in your personal headphones for more privacy, with ~27,000 free calls made each week
- **Direct 999 call button** with location sharing and two-press approach to limit accidental activation, with emergency messaging capabilities currently under development
- The opportunity to integrate **additional environmental sensors** in collaboration including on air quality (under trial), noise, and other environmental factors.

A range of factors are considered when choosing the site for each InLink and its associated payphone removal(s), including Council and community feedback. For more information refer to the Site Selection Criteria section below.

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

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, 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.

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

There are two security cameras above the ad displays as well as one built into the tablet. Currently the cameras are deactivated, and we have no immediate plans for this to change. If the time comes for the cameras to be turned on, it will be for a community benefit, and we will notify the public through multiple communication channels, including, where appropriate, doing so with public consultation and notifying stakeholders of our intentions.

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.



Site Selection Criteria

Except for situations where it is supported by the local council, the following are some of the considerations for determining the most suitable location for an InLink:

- **Feedback**, with Councils invited to give early feedback on proposals
- **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
- **Conservation 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 prioritised
- **Universal Service Obligation**, where BT is required to maintain payphone services

The London Borough of Hillingdon roll out

This application is part of a wider scheme of InLink implementation across the London Borough of Hillingdon at this time. As part of this phase of the roll-out a total of four InLinks are currently proposed. These proposals in Hillingdon are part of the London-wide roll-out of sites.

Aligned with planning policy

The application is for Prior Approval under Part 16 of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) [the GPDO] and Express Advertisement Consent under Regulation 9 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 [the Regulations].

The applicant, British Telecommunications PLC [BT], is an Electronic Communications Code operator for the purposes of the Communications Act 2003 and Part 16 of Schedule 2 of the GPDO. Prior Approval is sought by BT to exercise its permitted development rights under Class A of Part 16 to install electronic communications apparatus. The apparatus in question is an InLink.

Under the provisions of the GPDO, before beginning the permitted development, the operator must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required 'as to the siting and appearance of the development'.

Under the advertisement regulations, Express Consent is required for the advertisement element of the InLink. 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

National Planning Policy Framework (2012)

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 Prior Approval application and the Express Advertisement Consent application.

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

Paragraph 42

Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband **technology** and other communications networks also plays a vital role in enhancing the provision of local community facilities and services.

Paragraph 45

Applications for telecommunications development (including for prior approval under Part 24 of the General Permitted Development Order) should be supported by the necessary evidence to justify the proposed development. This should include:

- the outcome of consultations with organisations with an interest in the proposed development, in particular with the relevant body where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site; and
- for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines; or
- for a new mast or base station, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, International Commission guidelines will be met.

Paragraph 46

Local planning authorities must determine applications on planning grounds. They should not seek to prevent competition between different operators, question the need for the telecommunications system, or determine health safeguards if the proposal meets International Commission guidelines for public exposure.

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

Paragraph 67:

Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

London Borough of Hillingdon 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 co-ordinated 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.

Hillingdon Local Plan Policy

The Hillingdon development plan consists of the Hillingdon Local Plan: Part 1- Strategic Policies, the extant 2007 Saved Unitary Development Plan policies adopted as the Hillingdon Local Plan: Part 2, the West London Waste Plan and the London Plan. The relevant policies are set out below:

UDP Policy BE37 – Telecommunications

This policy states that telecommunications developments will be acceptable in principle provided that any apparatus is sited and designed so as to minimise its effect on the appearance of the surrounding areas. For prominent structures, planning consent will only be granted if there is a need for the development; no satisfactory alternative means of telecommunications is available; sharing of existing facilities is not reasonably possible and the appearance of the townscape or landscape is not seriously harmed.

UDP Policy BE27 - Advertisements

This policy states that express consent for advertisements will only be granted if they are of such a size and so designed and located that they do not materially harm the visual amenity in the area and do not unduly compromise public safety.

UDP Policy BE4 – Conservation Areas

This policy requires all development within or on the fringes of conservation areas to preserve or enhance those features which contribute to their special architectural and visual qualities.

Strategic Policy HE1 - Heritage

This policy aims to ensure that Hillingdon's distinct and varied environment, its settings and the wider historic landscape is conserved and enhanced.

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. 67, Policy 23 of the Mayor's Transport Strategy, UDP Policies BE37, BE27) –

The proposal site is located on the north side of High Street, on the pavement outside No. 91-93. This location currently has a payphone with an advertising panel. The current payphone will be removed and replaced with the proposed InLink. Traditional shop fronts and other businesses with associated advertising dominate the street scene at ground level. The street has items of street furniture including a bus shelter located near the site. The proposal would not appear incongruous in the context of the existing payphone, street furniture and commercial character of the area. The proposed InLink is marginally taller than the existing payphone by approximately 0.2 metres 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 panels associated with the existing payphone. In visual terms, at street level, there will be no significant change in presentation however, in being less bulky and having significantly smaller display screens, the proposed structure would be less visually imposing than the existing payphone. Taking into consideration the existing payphone and associated advertising panel and the commercial profile of the area, it is considered that the proposal would not have a significant adverse effect on the amenity of the area given the small size of the proposed structure. Furthermore, as the proposed InLink has a simpler and more contemporary design than the existing payphone it would replace, the visual appearance of this part of the street scene would be improved.

Reduction of street clutter (Policy 23 of the Mayor's Transport Strategy, Policy BE27) – The proposed InLink would not add to the existing street furniture, as it is a direct replacement for the payphone which already exists on-site.

Public safety, visibility splays and footway widths (NPPF para. 67, Policy 23 of the Mayor's Transport Strategy, Policy BE27) – The position of the InLink would not affect public safety or interrupt any visibility splays or sightlines. The proposed InLink would be aligned with the existing payphone, and, because the InLink is narrower and has no canopy, it would occupy a smaller area of the footpath. The available footway width would be increased from the current situation with the existing payphone in place. The proposal would not hinder pedestrian movement. The proposed InLink would be setback 0.7 metres from the edge of the kerb and would not obstruct road signs. It would display static images on two small screens. In this regard, the proposal would not have an unacceptable impact on road safety. The advertising screens would operate within the illuminance limits agreed on existing similar digital screens in the UK and within the levels recommended by the Institution of Lighting Professionals, as per the attached document – Proposed Schedule of Operating Conditions. This document also contains additional information in relation to the mitigation of highway safety impact.

Protection of heritage assets (NPPF para. 67, Policy BE4, Policy HE1)- Whilst the subject site is in Ruislip Village Conservation Area, it is located on a commercial street and at an established payphone site with advertising. The proposal takes a form which is sympathetic within the context of its immediate environment. Its slender and elegant appearance and high quality design will contribute positively to the streetscene. The existing payphone is an established feature of the street scene and its replacement with a similar structure would not have a detrimental impact on the character and appearance of this part of the conservation area or undermine those specific features and qualities as listed that warranted the Conservation Area's designation. The limited impact on the area that would result from the development would be outweighed by the public benefits of the scheme.

Provision of high quality telecommunications infrastructure (NPPF para 42, Policy 4.11 of the London Plan) –The above policy is clearly supportive of the proposal which would provide high quality communications facilities as set out in this statement. The InLink will enable connectivity to the internet allowing users to easily access information and services in accordance with the aims of this policy. The proposed location is accessible to many workers and residents as part of the wider InLink network. It is the type of high quality infrastructure that would support economic growth.

The proposed installation, which will provide communications facilities in the wider public good and which supports sustainable ways of working whilst minimising the impact on the surrounding area, is in complete accordance with relevant national and local planning policy.

Conclusion

InLink have the potential to significantly enhance the provision of local community communications facilities and services. It is precisely the type of high-speed digital infrastructure that the government is seeking to support as part of the presumption in favour of sustainable development. It will deliver social, economic, and environmental benefits by providing a suite of essential urban tools/services, including free ultrafast Wi-Fi to the residents and businesses in this area.

InLinks are of a high quality, accessible design that would be a significant improvement over the existing payphones.

The proposed InLink would be appropriately sited; it would not add to the existing street furniture; it would maintain sufficient footway widths; it would not harm heritage assets and, would not otherwise adversely affect amenity or public safety.

This statement has demonstrated that the proposal is in accordance with local development plan policy and national policy set out in the NPPF. On balance, the application warrants support and there are no material considerations that indicate otherwise.

Proposed Schedule of Operating Conditions

The technical specification of the advertisement screens are as follows.

Screen Panel Type:	LCD
Screen Dimensions:	69cm wide x 121cm high (55 inch)
Screen Area:	0.835m ²
Resolution:	1920(RGB)×1080, FHD
Maximum Daytime Brightness:	2500 cd/m ² (Typ.)
Maximum Night-time Brightness:	600 cd/m ² (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 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].

We will comply with the following conditions:

1. The intensity of the illumination of the digital sign shall not exceed 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.

Proposed Payphone Removal Condition

The removal of existing payphones is a central aspect of the InLink roll out programme with councils encouraged to also include this as a condition of granting consent if considered necessary.

A suggested wording for this condition is given below:

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.