Planning, Design, and Access Statement

Proposal
Full Planning Permission and Express Advertisement Consent is sought for the removal of two (2) existing BT payphones and the installation of one (1) InLink with excess space returned to the community.

InLink Site
Richmond Street (Outside No.48-50 Subway), Near Junction with Whitechapel, Liverpool, L1 1EE
(NGR: E334631 N390423)

Payphone Removal Site(s)
Whitechapel Junction of Sir Thomas St, Liverpool, L1 6BW
[53.406833/ -2.9850109]

Jnc Lord St OS Bhs Dorans Lane, Liverpool, L2 6PA
[53.405387/ -2.9870684]

Our Ref
LVP-074

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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.

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 0.22m²** InLinks are smaller than any comparable street furniture, and their installation also facilitates and **funds the removal of two existing BT payphones** giving back 1,78m² 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

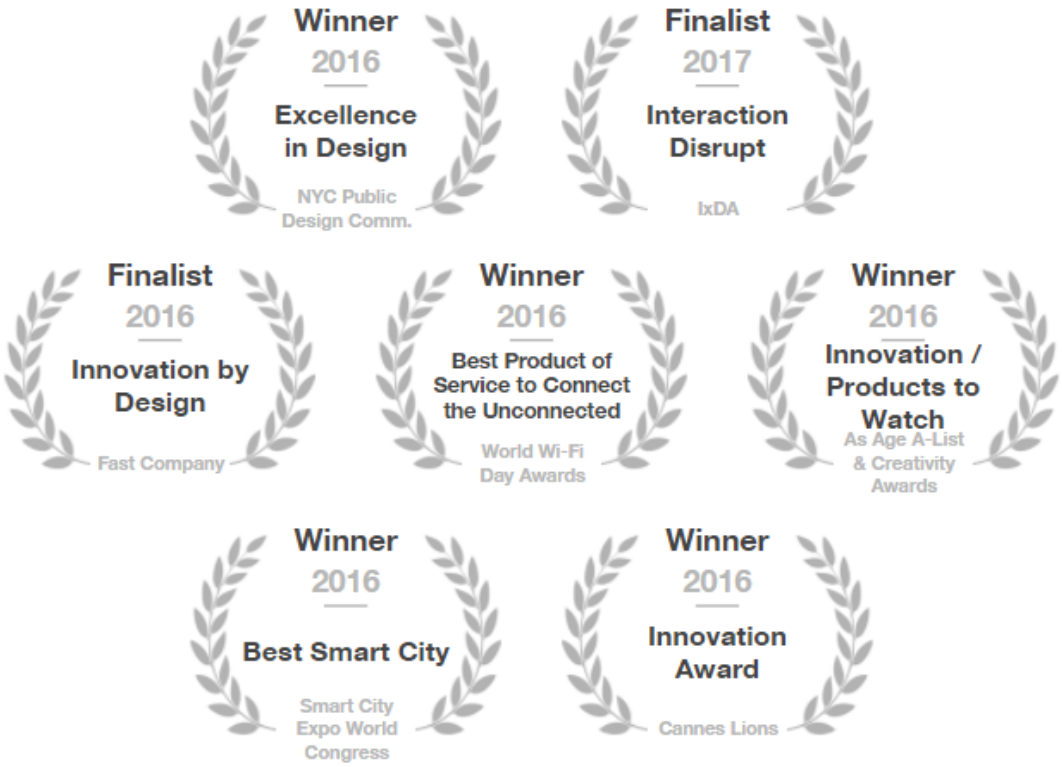
- **Direct 999 call button** with location sharing two-press approach to limit accidental activation
- The opportunity to integrate **additional environmental sensors** in collaboration with government including on air quality (under trial), and other environmental factors.

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.

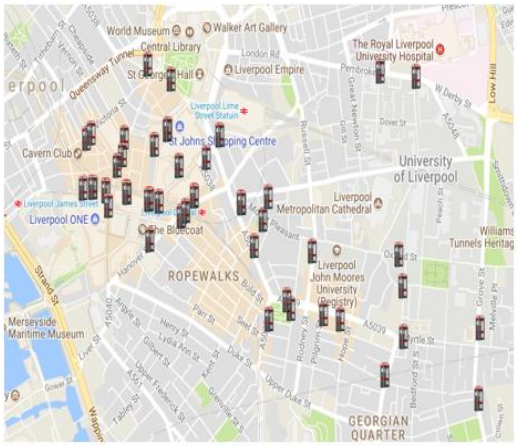
As part of this approach we welcome the opportunity to collaborate on all stages of the roll out in an area wherever possible.

The Liverpool Rollout

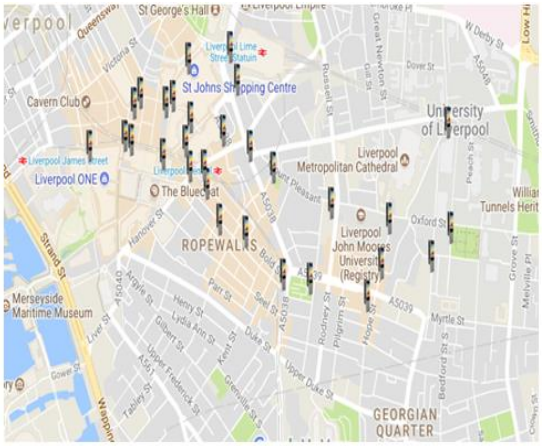
This application is part of a wider scheme of InLink implementation across Liverpool. There are currently 31 proposed sites that will form part of a wider connectivity solution to provide free ultrafast Wi-Fi coverage across Liverpool.

Several existing BT payphones are to be removed as part of the roll out of InLinks either through conversion or by removing kiosks in proximity to new sites. In total 61 payphones will be removed from various locations to help reduce visual clutter within the streetscene, with their functionality replaced and enhanced by the proposed InLinks. This will help to deliver a comprehensive network of connectivity within the city whilst decluttering the streetscene and removing 'hotspots' of anti-social behaviour.

Meetings and communication has been carried out with Liverpool City Council where all proposed site information was shared. Unfortunately, formal response on this has yet to be received from the Council thus 31 applications have now been prepared for submission. All 31 locations are summarized on the attached map 'Proposed InLink Locations and Existing Payphone Removals'.



Existing Payphone Removals



Proposed InLink Locations

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.

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

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

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

1

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.

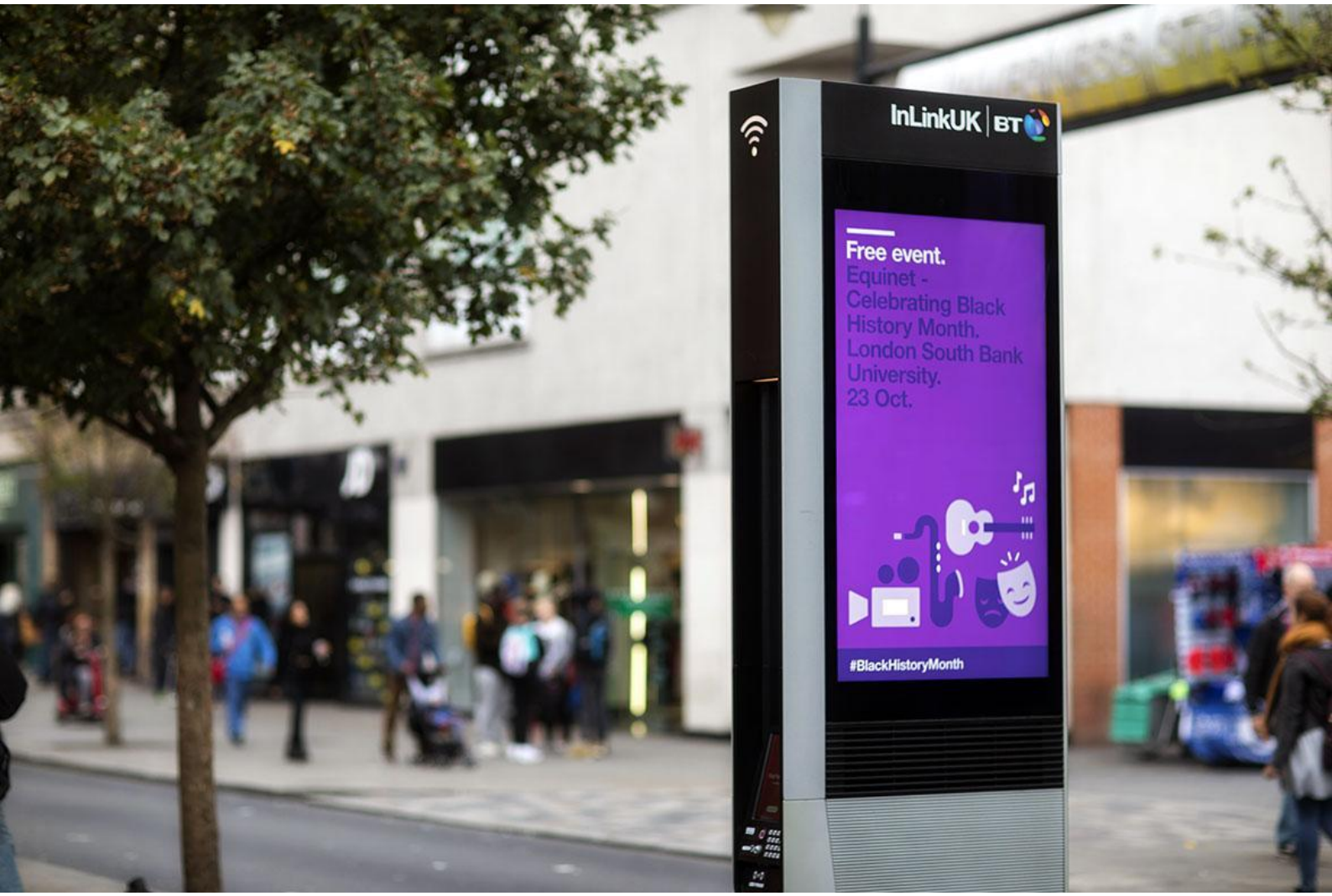
For full specifications of our screens please refer to the 'Proposed Schedule of Operating Conditions for InLinkUK Advertising Screens' included below.

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

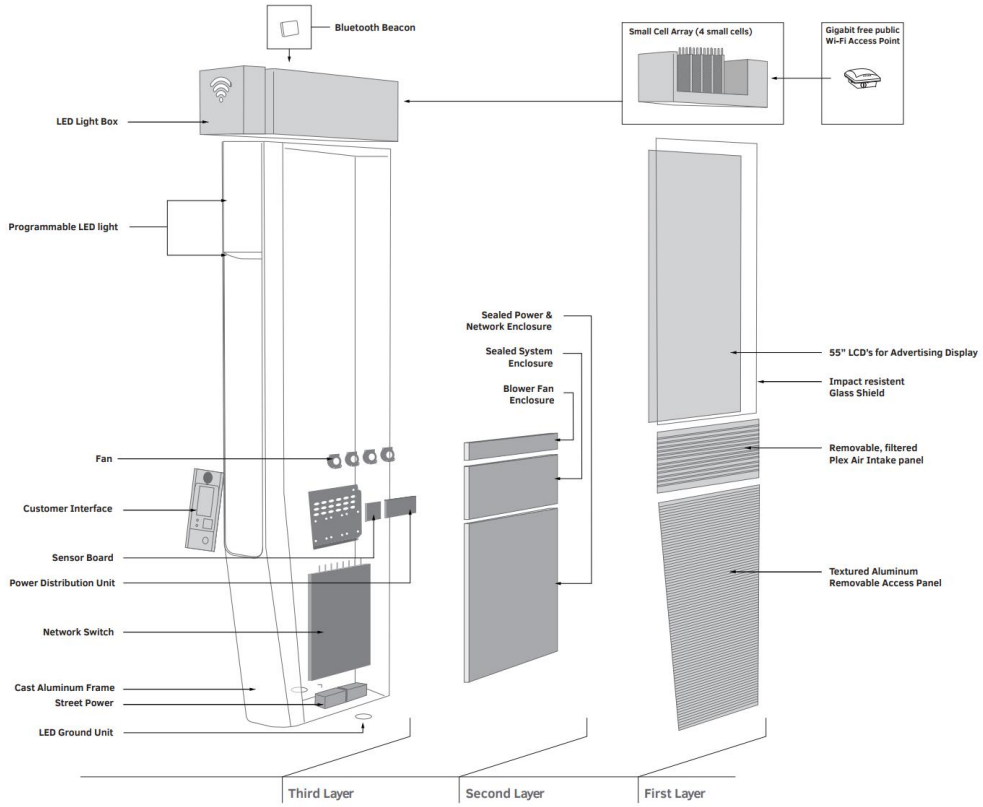
Maintainability and durability were key considerations in the design of the InLink, with each cleaned every two weeks with additional servicing provided as required through our ongoing support processes.

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.



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

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.

Liverpool 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.

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

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 Planning Permission 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.

Paragraphs 126 to 141
There paragraphs of the NPPF contain the heritage specific policies which seek to conserve and ensure enjoyment of the historic environment. They set out how local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

At paragraph 132 it states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be.'…Paragraph 134 states that "Where a development proposal will lead to less than substantial harm to the significance of a designated

heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use." Paragraph 135 states that 'in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

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.

Liverpool Local Planning Policy

Liverpool City Council Development Plan Policies

The Liverpool Unitary Development Plan (UDP)2002 and the Waste Local Plan 2013 currently form the statutory development plan for the City. The saved UDP policies will continue to apply until replaced by the emerging Liverpool Local Plan. The following policies are considered relevant to the proposed development:

Liverpool Unitary Development Plan 2002

HD25 Advertisements

1. Consent will not be granted for advertisements which by virtue of their size, siting, proliferation, or method of display, including illumination would:
    i. be a hazard or distraction to road users to the detriment of public safety; or
    ii. dominate or otherwise adversely affect, the amenity of an area.

Policy HD27 Telecommunications Code Systems Operators

Proposals for masts or other structures by telecommunications code systems operators will be considered having regard to the visual impact on the built and natural environment and the technical and operational requirements of the equipment and will normally be permitted provided that:

i. there is no suitable alternative site, structure or building that can be satisfactorily used for the purpose and that there is no reasonable possibility of sharing existing facilities;
ii. the proposal does not have a detrimental effect on the amenity of adjoining premises or on the overall visual amenity or character of an area. Particular attention will be paid to the character or appearance of a listed building or a conservation area;
iii. the proposal is designed, landscaped and screened to minimise their effect on the appearance and amenity of its surroundings; and
iv. the proposal will replace existing masts or structures or will facilitate future network development by reducing the need for additional masts or structures.

Another relevant UDP policy is Policy GEN3 Heritage and Design in the Built Environment which aims to preserve and protect the built environment of the city by encouraging high standards of design.

Liverpool Core Strategy Submission Draft 2012

In response to changes in government guidance, work on the Core Strategy document the council had previously been progressing ceased and instead the City Council is preparing a new Local Plan. However, the Core Strategy policies, which reached 'submission draft' stage in 2012 will subject to alignment with the NPPF, be treated as a material consideration in planning decisions.

The Core Strategy will be at the heart of Liverpool's Local Plan. Its central approach is to capitalise on Liverpool's assets and resources to achieve urban and economic growth, prioritising those areas of the City with the greatest development potential. It aims to stimulate, support and deliver economic growth and address regeneration needs.

The Core Strategy sets out the spatial development strategy for Liverpool, in which it discusses the importance of ensuring that robust infrastructure is in place to support better connectivity and economic prosperity. Chapter 2, Policy Context, 2.2 is clearly supportive of the proposal and identifies connectivity as one of the five strategic drivers required to support growth in the City.

The Draft Liverpool Local Plan September 2016

The draft Local Plan was consulted upon in 2016 and is a material consideration to which weight should be attached for decision making.

Policy UD10 Advertisements

Proposals for advertisements will only be permitted where:

- They are of the highest standard and contribute, rather than detract from an area;
- They do not constitute a traffic hazard or detract from important landmark buildings;
- They do not become part of a critical mass of similar advertisements that lead to clutter;
- Hoardings and housings are well designed and are based on local considerations;
- They do not lead to loss of amenity to local residents or businesses due to light or noise pollution;
- The size and scale is appropriate to the size and scale of the building.

Policy HD1 Designated Heritage Assets

The first two criteria of this policy stipulate that consent will not be granted for applications which are not fully justified and accompanied by full information necessary to assess the impact of the proposals on the heritage asset or for works which are unsympathetic to the heritage asset and/or its setting. In considering any proposals, the council will take into account the quality of the design, layout and materials.

Siting justification against planning policy

The siting criteria used to site each InLink in the network across Liverpool include Planning and Urban Design criteria relating to visual character of the street scene, proximity to sensitive heritage assets, overall scale of setting, pavement width, and surrounding land uses and social context. These criteria have been adjusted where necessary on a site by site basis to account for local policy requirements. Further criteria include Wi-Fi network coverage, proximity to existing communications, infrastructure, pedestrian flows, population coverage, and potential advertising audience.

Justification of the siting of the proposed InLink is detailed below against the local policy requirements:

Character of the local street scene/context and amenity (NPPF para. 67, HD25, HD27 and UD10) – The application site is a paved footway in Richmond Street, outside No. 48-50 Whitechapel. The site is in a busy retail area of the city centre. Traditional retail units with associated advertising line the footway on both sides. Whilst this footway is generally free of street furniture, the proposal site is close to Whitechapel which has several items of street furniture in street scene. The proposal will therefore not look out of place in the context of existing street furniture within this commercial setting. The limited height and bulk of the InLink would ensure it does not appear unduly prominent or adversely impact on the area's amenity.

Reduction of street clutter (HD27, UD10) – The proposed InLink will replace two existing BT payphones in the area as identified earlier in this statement thereby reducing street clutter. The proposed InLink will be removed from the site when no longer required.

Public safety, visibility splays and footway widths (NPPF para. 67, HD25, UD10) – The position of the InLink would not affect public safety or interrupt any visibility splays or sightlines. The subject footway has sufficient space to accommodate the installation and allow for its safe usage by pedestrians and wheelchair users. The InLink will be sited away from the highway and would not affect road users. The advertising screen would operate within the limits agreed on existing similar digital screens in the UK, 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. There are no other apparent public safety issues.

Protection of heritage assets (NPPF para. 67, para. 126-141, HD27, HD1) – The proposal site lies in the Liverpool Maritime Mercantile World Heritage Site boundary. The nearest Grade II listed building (45, Whitechapel and 19-23, Sir Thomas Street) is located approximately 30 metres to the north west. The proposal is of a high quality design and will therefore complement the commercial profile of this area. Due to the small scale nature of the proposed development, it would not have a detrimental impact on the above heritage assets.

Provision of high quality telecommunications infrastructure (NPPF para 42-43, UD10, GEN3) – The InLink would provide high quality telecommunications facilities as set out above. It is the type of high quality development encouraged by the council within the World Heritage Site that will help stimulate city centre regeneration and enhance the profile and image of the city. The proposed location is accessible to many workers, students, tourists and residents as part of the wider InLink network.

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

InLinkUK has the potential to significantly enhance the provision of local community communications facilities and services (Section 5 of NPPF and Core Strategy Policy Context, paragraph 2.2).

InLinks are of a high quality, accessible design that would be a significant improvement over the existing payphones (UD10, GEN3).

The proposed InLink would be appropriately sited (NPPF para. 67, HD25, HD27, UD10); it would reduce street clutter (UD10); it would maintain sufficient footway widths and visibility splays (NPPF para. 67, HD25, UD10); would not adversely affect heritage assets (NPPF para. 126-141 and 67, HD1); 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.

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

The technical specification of the advertisement screens are as follows.

Screen Panel Type:	LCD
Panel Size:	55 inch
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 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.