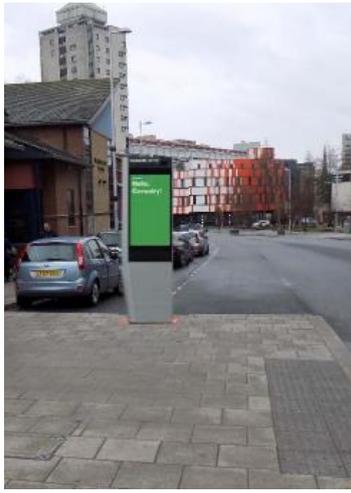


# Planning, Design and Access Statement

Our Ref.	COV-038
InLink Address	O/S Salvation Army, Upper Well Street
Postcode	CV1 4AG
NGR	E:433135 N:279321
Project Type	New Site
Conservation Area	N/A
Statutory Listed Buildings	Near scheduled ancient monument of Coventry City Wall

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

As part of our collaborative approach to connecting and improving local streets, **Full Planning Permission and Express Advertisement Consent is sought for the removal of up to two (2) existing BT payphones and the installation of one (1) InLink with excess space returned to the community** based on the following sites and with the recommended conditions of consent included at the end of this Statement:

<b>Install</b> O/S Salvation Army, Upper Well Street, CV1 4AG	<b>Proposed Removal 1</b> Belgrave Theatre, Belgrade Square, Corporation St, CV1 1GS	<b>Proposed Removal 2</b> Opp Thomas Yeoman Ho Pco1 Leicester Row, CV1 4LH
		

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

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

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

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

Payphone removals and the installation of an InLink will provide a positive effect on local and visual amenity by reducing the amount of street furniture on pavements in the area and providing free services through a modern and aesthetically pleasing addition that will assimilate well into the street-scene.

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

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

This proposal is part of a package of applications submitted to Coventry City Council and aligned to the UK Digital Strategy, the National Planning Policy Framework, and the Council's development plan and other relevant planning policy and guidance.

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

## What is an InLink

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

- **Free ultrafast Wi-Fi with speeds up to 1 Gb per second within 100m** of each InLink. More than 169,000 unique users have already subscribed to the Wi-Fi, which as of September 2018, saw them use enough data to view over 513 million webpages
- **Touchscreen tablets** to access council services, BT's phone book, maps and directions, with more than 50,000 tablet sessions every week
- **Accessible** in design including hearing induction loops, braille embossed and TalkBack functionality in the tablet for those with disabilities
- All InLinks are powered by **100% renewable carbon-free energy** with screens **dimming to 600cd/m<sup>2</sup> at night** in line with the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements
- Maintenance of InLinks is paid for and undertaken by InLinkUK, and each InLink is **inspected weekly and cleaned every two weeks**, with the ability to rapidly respond on an as-needed basis to feedback and any issues monitored by internal sensors.
- With a **footprint of just 0.22m<sup>2</sup>** InLinks are smaller than any comparable street furniture, and the installation of **each will typically facilitate and fund the removal of up to two existing BT payphones** giving back 1.78m<sup>2</sup> for each installed
- **438 hours of council content** are provided for free on on each display screen of each InLink per year for the Council to promote local initiatives, news, and events. This equates to 5% of every hour of screen time.
- Direct **access to charities** through the use of the dedicated charity tile on the fully-accessible interactive tablet
- Over 1,000 hours per year of hyper-local content allow each InLink to act as a **community notice board** with the InLinkUK team able to work with local groups to promote nearby events and activities
- Secure power-only USB ports for **rapid device charging**
- **Free phone calls for everyone** provided by BT, including the option to plug in headphones for more privacy, with approximately 50,000 free calls made each week. Unlike payphones, InLinks do not include or require a handset
- **Seeking to improve the sense of safety in an area** and assisting the reporting of crime and disorder by providing a **direct 999 call button** with location sharing and two-press approach to limit accidental activation, with the screens able to be used by groups such as the Police to display emergency and community messaging.
- The opportunity to integrate **additional environmental sensors** in collaboration including on air quality (under trial), noise, and other environmental factors.

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

## InLink design and technical information

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

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

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



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

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

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

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

## Accessible for all types of users

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

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

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

## Site Selection Criteria

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

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

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

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

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

## The Coventry roll out

This application is part of a wider scheme of InLink implementation across the city of Coventry. A total of 9 locations have been identified for the installation of an InLink. All 9 proposals will be subject of applications for Express Advertisement Consent under the Control of Advertisement Regulations in respect of the 2 no. LED digital display screens located on either face of the InLink. This tranche of applications follows the initial submission of 22 locations which were submitted in June 2018 after extensive pre-application consultation with Coventry City Council.

In terms of roll-out, where possible and practicable, it is proposed to install InLinks either as a direct replacement for existing BT payphones, or in very close proximity to such payphones. As these existing payphones will be removed (2No. for each InLink) it should minimise impact on existing streetscenes by reducing street clutter, or at least not adding to it at particular locations. Whereby a new InLink is proposed, BT payphones will be removed, again where possible and practicable from the same streetscape, or same visual envelope, again to try to minimise impact on visual clutter. Of the 9 proposed sites, 3 will be conversions of existing BT payphones, 2 will be relocations of BT payphones, and 3 are new sites for the proposed InLinks. Where there are not two existing payphones at the current location proposed InLink, an additional payphone will be removed from the wider vicinity. The proposed InLink's will help to deliver a comprehensive network of conenctivity across the city whilst decluttering Coventry's streetscene.

## 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 (2019) - 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 Full Planning 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 minimise 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 prioritise 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.

## Coventry Local Planning Policy

The current adopted development plan for Coventry is the Coventry Local Plan (2016) adopted on 6<sup>th</sup> December 2017.

The Local Plan sets out Coventry's blueprint and vision to help re-establish itself as one of the country's top 10 cities, enhance its position at the centre of the Coventry and Warwickshire sub-region and contribute towards the West Midlands' engine for growth. It is the fastest growing city outside Greater London with job creation growing and the two universities thriving. Such growth is supported by high quality infrastructure, including being a Gigabyte City, classed as a "living lab" with continued investment in its IT facilities and broadband connectivity and hosting a range of new and innovative technologies such as driverless cars. The plan also seeks to exploit the City's rich historic assets, 20<sup>th</sup> century heritage and showcase innovative 21<sup>st</sup> century buildings and new city centre public realm.

The policies of relevance to the siting and appearance of the proposed InLinks are highlighted below:

**Policy R2 Coventry City Centre – Development Strategy.** This policy seeks to continue to develop and regenerate the city centre, by leading in design, sustainability and culture. A number of criteria are listed to enable the achievement of this objective.

**Policy DE1 Ensuring High Quality Design.** This policy is again a criteria-based policy requiring proposals to respect and enhance their surroundings and to positively contribute to the local identity and character of an area. The setting, integrity and character of heritage assets should be protected in accordance with **Policy HE2**.

The Local Plan recognises that a digitally accessible city will allow people enhanced freedom of choice where and how they work and how they interact with services and facilities. It further recognises that a connected community is a more sustainable one and promotes the city as a suitable place for high technology activities. It confirms there are currently no legal requirements to provide such facilities as standard, although this may change with changes to building regulations, however despite a nationwide installation programme by major suppliers it is recognised that there is a genuine risk that gaps in connectivity will continue to remain within the market, especially within new developments that grow and expand in urban areas. In addition to broadband connectivity the plan acknowledges that the provision of mobile internet services is becoming increasingly important. Policies C1 and C2 relating to Broadband and Mobile Internet and Telecommunications support these ambitions.

**Policy C1** requires new development to make provision for broadband and digital infrastructure as part of the development design and construction process, and that such provision should be aligned with the Digital Communications Infrastructure Strategy and the European Digital Agenda.

**Policy C2** relates to the siting and design of telecommunications development taking into consideration operational and technical limitations, the need for ICNIRP compliance, the series of options for consideration, including site sharing, siting on tall buildings and structures, and its impact on the character and appearance of an area, in particular its impact on existing heritage assets, or other environmental designations.

The Council's Digital Strategy seeks within the next few years to have a growing number of free Wi-Fi hotspots with an aspiration to provide city wide public free Wi-Fi and to work with suppliers and partners to achieve a high coverage of ultrafast internet connectivity.

## Siting justification against planning policy

The proposed InLink outside the Salvation Army on Upper Well Street, is one of several planned for siting around the city to provide a seamless Wi-Fi connectivity to users as they move through the area to travel, shop, or enjoy recreational facilities.

In terms of its appearance the InLink's innovative and modern design is generally in keeping with most city centre townscapes and careful siting seeks to ensure that material harm is not caused to existing designated heritage assets in accordance with NPPF guidance.

The aim to replace existing BT payphones with the InLink which provides public calling facilities (free to UK landlines and mobiles) will generally enhance the public realm and many streetscapes, whilst providing free digital connectivity, and other services to enrich the users experience of moving through this public realm. The advantage in terms of advertisement will remove the display of many adverts with deemed consent replacing them with modern LED digital displays which will be properly maintained and can be controlled through the requirement for express consent.

Modern cities require to provide both residents and visitors with digital connectivity to enable their day to day living and enjoy recreational activities, all of which contributes to the vitality of the city and its economic and social sustainability. The InLink will provide such a service but to enable this Wi-Fi to be provided free of cost to the public, the adverts will help support this function and as such are in intrinsic part of the development.

The locations of the InLinks have been primarily identified to replace existing BT payphones, where possible and practicable, but also to provide seamless fast, free Wi-Fi service throughout the key commercial, retail areas within the city whereby residents and visitors can use this service, together with the other benefits of the InLink, such as free UK landline and mobile calls, charging devices, emergency call button and wayfinding and information. In addition, within Coventry some InLinks are proposed in areas whereby tourists enjoy recreational facilities, such as along the esplanade, as such services will enhance the overall tourist experience.

The site is located outwith any local planning designation. The streetscene consists of primarily contemporaneous architectural styles with buildings varying from 1 storey upwards. In this particular instance, 2 existing BT payphones will be removed which will reduce street clutter. The InLink's modern innovative design does not detract from the appearance of the streetscene given the prominence of modern architecture seen in wider views. In addition, the buildings' larger scale and massing is such that the InLink will not detract from the visual amenity of the area, nor detract from the character of the wider area.

As highlighted above the InLink has added benefits which are in accordance with the Policy R2 in terms of improving the public realm within the city centre.

The removal of the two BT payphones from the city centre will reduce existing street furniture and return additional footway to the community, again which accords generally with Policy R2.

As highlighted above the design of the InLink will comply with Policy DE1 in that its innovative design will be in keeping with that of the regenerating city centre and will not detract from the character and appearance of the streetscene.

A series of sensitively sited InLinks across the city including this one will provide free Wi-Fi and thereby digital connectivity within the public realm allowing users to benefit from this connectivity whilst moving through the city, this is generally in accordance with the provisions of Policy C1 in meeting the ambitions of the Digital Communications Infrastructure Strategy and European Digital Agenda.

It is contended that the design of the InLink is contemporary, modern and has an appropriate scale within the streetscape, and that the careful siting of this InLink on Upper Well Street is appropriate for this city centre location. It is in keeping with the scale and modern design of other street furniture within the streetscape and does not detract from the character and appearance of the wider area.

Policy C2 relates more to the siting of traditional telecommunications apparatus and equipment for mobile operators, rather than this ground-based apparatus providing only Wi-Fi, however the siting of the InLink has been considered in terms of providing a contiguous Wi-Fi network throughout the public realm areas of the city, most frequented by residents, visitors and tourist due to the retail, commercial and recreational nature of the area. This will allow connectivity to be continued as people move throughout these areas providing them constant use of their mobile devices, using a free network.

The proposed InLink has other communications benefits in terms of its free calling to UK landlines and numbers, charging and wayfinding and local information services via the integral tablet. It is not appropriate to consider sharing of existing facilities for this Wi-Fi network provision, nor does it require an ICNIRP declaration, as Wi-Fi high frequency fields do not operate above the heating threshold for the human body. As outlined above however the siting of the InLink at this location opposite Poundland on Market Way does not result in a visually cluttered appearance, nor does it detract from the existing character and appearance of this city centre location, and is therefore compliant with these provisions, as relevant of Policy C2.

## Conclusion

The InLink, in providing free Wi-Fi connectivity and other valuable services to shoppers, tourists and others, thereby encouraging greater use of the city centre and enhancing recreational areas, is part of the wider digital connectivity expected in modern cities. 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.

The siting and appearance of the InLink is considered to gain support in terms of its location for Wi-Fi connectivity, and its appearance in terms of overall impact on the existing streetscene. InLinks are of a high quality, accessible design that would be a significant improvement over the existing payphones in the Council's borough.

As highlighted in the previous section, the siting and appearance of the proposed InLink at this location, does not detract from the character and appearance of the streetscape, or the wider area. It is considered this proposal is compliant with both the local development plan and the NPPF.

It is considered the advertisements proposed by this application gain support from the Council's development plan and national planning policy in NPPF in terms of their impact on visual amenity. Furthermore, they are in accordance with the requirements of Regulation 3 in terms of their impact on amenity and public safety and as such this application should be approved, thereby giving express consent for the display of the LED digital advertisements forming part of the InLink at this location.

A schedule of the proposed operating conditions for the advertisements are attached below this statement for reference.

## Recommended Conditions of Consent

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

- A. *Within three (3) months of development commencing the existing BT payphones shown in this document shall be removed in their entirety and the land made good to the same condition as the adjacent land.*
- B. *Pavement surrounding the InLink shall be made good to the same condition as the adjacent land.*
- C. *The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m<sup>2</sup>) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*
- D. *The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*
- E. *The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*
- F. *The interval between each piece of content on the digital display screens shall take place over a period no greater than one second; the complete screen shall change with no visual effects (including swiping or other animated transition methods) between displays and the display will include a mechanism to freeze the image in the event of a malfunction.*
- G. *No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.*

## Digital Display Screen Technical Specification

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

Screen Panel Type:	LCD
Screen Dimensions:	69cm wide x 121cm high (55 inch in portrait)
<b>Screen Area:</b>	<b>0.835m<sup>2</sup></b>
Resolution:	1920(RGB)x1080 , FHD
Maximum Daytime Brightness:	2500 cd/m <sup>2</sup> (Typ.)
<b>Maximum Nighttime Brightness:</b>	<b>600 cd/m<sup>2</sup> (Typ.)</b>
Contrast Ratio:	5000:1 (Typ.)
Display Colours:	16.7M (8-bit) , CIE1931 72%
Viewing Angle:	178/178 degrees
Lamp Type:	WLED
Operating Temperature:	0 ~ 50 °C
Sunlight Readable:	Yes

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

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

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

The lighting levels noted above are within the levels set for this type and size of screen (those under 10m<sup>2</sup>) as set by the Institute of Lighting Professionals, Professional Lighting Guide 05: The Brightness of Illuminated Advertisements.