

Our Reference: BT/InLink/GLS-117

Date: 22nd February 2021

F.A.O Planning Department
Glasgow City Council
45 John Street
Glasgow
G1 1JQ

Submitted via Planning Portal

Dear Sir/Madam

SUBMISSION OF PLANNING APPLICATION FOR CONSENT TO DISPLAY AN ADVERTISEMENT(S) ON FREESTANDING 'INLINK' EQUIPMENT OUTSIDE No. 532, SAUCHIEHALL STREET, GLASGOW, G2 3LX (NGR: E-258035, N-666008)

The proposal comprises the request for Express Advertisement Consent under Part V of The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 to display an advertisement(s) on internally illuminated digital LCD screen to both sides of freestanding 'InLink' equipment.

As per regulation 4 of the Regulations, applications for express advertisement consent must be determined in the interests of amenity and public safety, taking into account any material factors.

This request for Express Advertisement Consent is submitted in conjunction with a Non-Material Amendment application to an existing planning permission for an 'InLink' unit at the above location. Additionally, this application for consideration would in effect supersede the extant Advertisement Consent granted for the previous unit with the main difference in this regard being an increase in the size of the digital display (in portrait) from 1210mm x 690mm to 1670mm x 950mm – an increase in height of 460mm and width of 260mm.

This application for express advertisement consent comprises:

- Completed Advertisement Consent Application Form;
- Location Plan (1:1250) and Proposed Site Plan (1:100) with site outlined in red;
- InLink dimensioned elevations;
- InLink Product Statement;
- InLinkUK/BT Anti-social calls press release document;
- InLinkUK/BT Anti-Social Behaviour Management Plan;

- ICNIRP Conformity Document;
- The appropriate fee of £202.

National Planning Policy

Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984

The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 set out the Government's advertisement control planning policies for Scotland and how these are expected to be applied and is considered to be a material consideration for the Express Advertisement Consent application.

The Town and Country Planning (Control of Advertisements) (Scotland) Regulations 1984 state the following specifically in relation to advertisement control:

"PART II – GENERAL PROVISIONS

Control of advertisements to be exercised in the interests of amenity and public safety

4. – (1) The powers conferred by these regulations with respect to the grant or refusal of consent for the display of advertisements, the revocation or modification of such consent, and the discontinuance of the display of advertisements with consent deemed to be granted, shall be exercisable only in the interests of amenity and public safety.

(2) When exercising such powers a planning authority –

(a) shall, in the interests of amenity, determine the suitability of the use of a site for the display of advertisements in the light of the general characteristics of the locality, including the presence of any feature of historic, architectural, cultural or similar interest; and when assessing the general characteristics of the locality the authority may disregard any advertisements being displayed therein;

(b) shall, in the interests of public safety, have regard to the safety of persons who may use any road, railway, waterway (including any coastal waters), dock, harbour, or airfield affected or likely to be affected by any display of advertisements; and shall in particular consider whether any such display is likely to obscure, or hinder the ready interpretation of any road traffic sign, railway signal, or aid to navigation by water or air;

But without prejudice to their power to have regard to any other material factor."

Local Planning Policy

The relevant planning policies comprise the following documents:

- Glasgow's City Development Plan (2017)

In terms of local policy, the advertisement specific policies within these documents are as follows:

- CDP 1: The Placemaking Principle
 - Supported by SG1 - The Placemaking Principle (Part 2), Section 8 – Signs and Advertising

“8.1 In determining the acceptability of an advertisement display, each case will be assessed against its impact on:

a) visual amenity, see Definition (not only of the property itself but also neighbouring properties and the surrounding area); and

b) public safety (particularly the safety of pedestrians, drivers and other road users)

8.2 Visual Amenity - To ensure that the visual amenity (see Definition) of an advertising site or the surroundings is not adversely affected:

a) all advertising signs should be of high quality materials. The Council will welcome innovative design and will look for the improvement of existing authorised signs where the opportunity arises;

b) the Council will resist the accumulation of advertising clutter;

c) all advertising on premises should be seen as part of the overall design of the property and should respect its original design, not appear as an addition.

d) consent will be resisted for directional signs remote from the curtilage of the premises to which they relate;

e) on listed buildings, and within conservation areas, a higher quality of design and materials will be expected to reflect the property or area's character and appearance (signage should complement the original architectural style and features of the building); and

f) any original or historically significant signage should be retained and incorporated into refurbishment, where possible.

8.3 *Public Safety - To ensure that public safety, see also SG1 - Placemaking, Part 1, is not adversely affected, the following will be taken into account:*

a) proximity to traffic signals; Colours and level of luminance should not interfere or cause distraction to road and cycleway users in the vicinity of signals;

b) proximity to other hazards on the road where the advertising sign may interfere with visibility or cause driver/cyclist distraction e.g. junctions, queuing traffic and pedestrian crossing points, the approach to traffic signal controlled junctions;

c) cumulative impact relative to existing signage, including road signs;

d) proximity to a roundabout or complex priority junction; and

e) the potential obstruction of paths and cycleways, including headroom (advertising signs adjacent to any pedestrian and/or cycle route should be displayed at least 2.5m above ground level)."

Given that the extant advertisement consent for the existing planning permission was assessed and deemed acceptable in terms of consideration against the relevant development plan policies, it is considered that the proposal would remain compliant with policy at a local level.

In terms of the advertisement screens these are an intrinsic part of the InLink, but careful consideration has been given to their siting in terms of both visual amenity, including any cumulative impact, and public safety as required by the relevant Regulations and national policy contained within the NPPF.

Policy Analysis

In terms of the proposed development, the relevant national guidance outlined above clearly acknowledges support for advertisement so long as it is exercised in the interests of amenity and public safety. Public benefits are defined within the NPPG and could be anything that delivers economic, social or environmental progress. Benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.



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.

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/m² in accordance with the levels set for this type and size of screen (those under 10m²) 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.

At no cost to taxpayers or users, the proposed advertising on the sides of the InLink unit will improve the public realm by providing everyone in the community with an unprecedented suite of essential urban tools, including free council and community advertising, maps and wayfinding, public messaging capabilities, and a platform for future technologies like air quality monitoring. For example, 438 hours of council content will be provided for free 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. Additionally, over 1,000 hours per year of hyper-local content will 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.

To help maximise public safety, the InLink display screens will be able to assist in the reporting of crime and disorder by allowing the police to use the screens to display emergency and community messaging. Furthermore, there are opportunities to integrate additional environmental sensors in collaboration with on screen reporting - including on air quality (under trial), noise, and other environmental factors. These integrations would allow for further health and safety information to be displayed to the local community via the two display screens.

The amended 'InLink' unit design would not constitute a traffic hazard given its height within the existing street scene context, modest size and moderate advertising. The position of the units have been selected to ensure they would not affect public safety or interrupt visibility splays or sightlines to any extent that would present any road safety issues. Siting has been selected to ensure that the maximum footway width remains following the development to allow safe usage of the pavement by pedestrians and wheelchair users. The amended proposal will not result in any material change

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from that of the extant consent in regard to policy consideration. Additionally, the 'InLink' unit meets all standards required of electrical street furniture of this type, including the Machinery Directive (2006/42/EC), EMC Directive (2014/30/EC) and the associated BS EN ISO standards. BT are committed to proactively ensuring products meet the pertinent safety and certification standards on an ongoing basis.

Therefore, the proposal for Express Advertisement Consent remains consistent with the relevant development plan policy CDP1 and national guidance against which the extant consent was assessed against, forming part of a package of applications submitted to Glasgow City Council.

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

Digital Display Screen Technical Specification

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

Screen Panel Type:	LCD
Screen Dimensions:	95cm wide x 167cm high (75 inch in portrait)
Screen Area:	1.586m
Resolution:	3840 x 2160 UHD
Maximum Daytime Brightness:	2500 cd/m ² (Typ.)
Maximum Nighttime Brightness:	600 cd/m² (Typ.)
Contrast Ratio:	1200:1 (Typ.)
Display Colours:	10bit (D) 1.07 Billion Colours
Viewing Angle:	178/178 degrees
Lamp Type:	LED
Operating Temperature:	0 ~ 50 °C
Sunlight Readable:	Yes

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

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

- There would be no conflict with any traffic signs, signals, crossing points, schools, hospitals or low bridges.
- No sightlines or clearances would be affected.

- The TfL guidance states that 'Static digital advertising is likely to be acceptable in locations where static advertising exists or would be accepted.' There are existing traditional advertisement on similar sections of the respective roads in many cases.
- The geometry of the roads are not complicated and the driving conditions are not considered to be demanding or complicated.
- The advertisements would not be experienced by a driver in conjunction with any other similar digital advertisements.
- As per the TfL guidance, the advertisements would be located as close to the driver's natural eye line as possible and facing as head-on to the traffic as is practical.

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

Recommended Conditions of Consent

To give assurance each InLink will operate as intended, we recommend the following conditions (or a version there of) as previously suggested, be included as part of any advertisement consent:

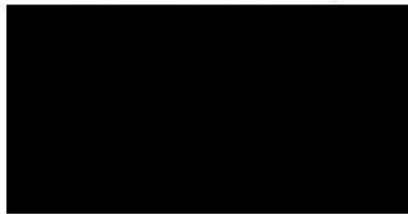
- A. The intensity of the illumination of the two digital display screens shall not exceed 600 candelas per square metre (cd/m²) between dusk and dawn in line with the maximum permitted recommended luminance as set out by 'The Institute of Lighting Professional's 'Professional Lighting Guide 05: The Brightness of Illuminated Advertisements'.*
- B. The digital display screens shall not display any moving, or apparently moving, images (including animation, flashing, scrolling three dimensional, intermittent or video elements).*
- C. The minimum display time for each piece of content on the digital display screens shall be 10 seconds.*
- D. 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.

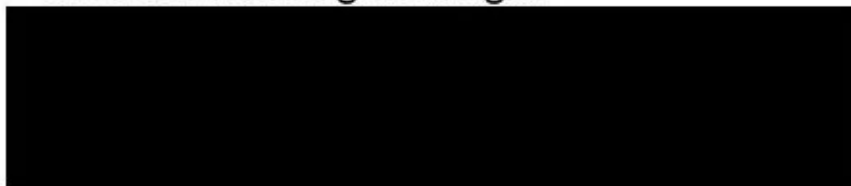
E. No content on the digital display screens shall resemble traffic signs, as defined in section 64 of the Road Traffic Regulation Act 1984.

We trust that the above information is acceptable, however should you require any additional information, or have any queries relating to this application, please do not hesitate to contact me direct on any of the details provided below.

Yours faithfully



Martin Brown
Senior Planning Manager



For and on behalf of BT Group plc