InLinkUK

Planning, Design and Access Statement

Proposal

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

InLink Site

Brown St (Opp No.58 Tesco and H&M Jct Market St)

Lat/Lon: 53.482415, -2.241615

Kiosk Removal Site(s)

4 Kiosks at Brown St (Opp No.58 Tesco and H&M Jct Market St)

53.482415, -2.241615

Our Ref

MNC-003

Contents

InLinkUK Introduction 4
InLinkUK Rollout Programme in Manchester 6
InLink Technical Information 7
Design 7
Accessibility 8
InLink's Tablet 8
Free calls to mobile, local and national numbers 9
Calls to the Emergency Services 9
Fast Charging 10
InLinks Digital Screens 10
Energy Conservation Approach 11
Screen brightness to dim at dusk 12
Benefits - Improving the streetscape with smart city technology 13
Smart City Sensors and Data 13
Decluttering the streets 14
Connectivity through gigabit Wi-Fi 16
Advertising for businesses of all sizes 17
Materials and Maintenance of an InLink 17
Installation of InLinks 18
Site Information 19
Consultation and Key Stakeholder Engagement 20
Planning Policy 21
NPPF 21
Local Planning Policy 23
Siting Justification against Planning Policy 26

Conclusion..... 28

InLinkUK Introduction

InLinkUK from BT is provided through a joint venture between Intersection, the technology company behind LinkNYC, and Primesight, a leading UK out-of-home media company in partnership with BT.

InLink's technology provides an unprecedented suite of essential urban tools to the streets, including the following:

- Free Gigabit Wi-Fi at each InLink enabling speeds of up to 85 times faster than standard broadband for people to use for free;
- Free calls to all UK landlines and mobiles;
- Free mobile phone and device charging;
- Free real-time maps on our tablets;
- Access council services via a dedicated tablet app. for free;
- Emergency services button giving a specific geo-location;
- A revolutionary approach to advertising and public messaging, powered by data;
- 5% of screen time gifted to communities for free;
- Decluttering the streets through the removal of BT payphone kiosks.



Figure 1 - InLink CGI

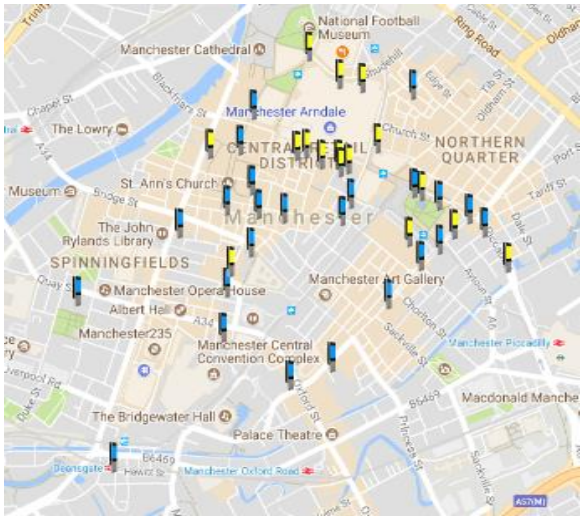
We provide this service at no cost to the Council, taxpayer or end user as all InLinkUK services are paid for by advertising on the InLink's digital display screens.

InLinkUK will connect us with each other, connect us with our surroundings and ultimately connect us with the entire City itself.

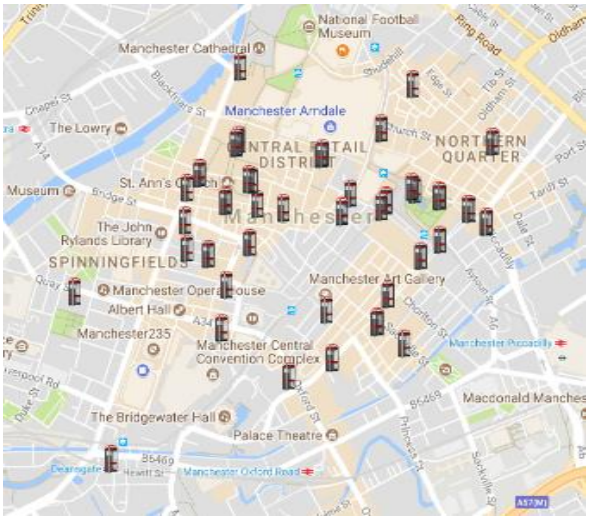
InLinkUK Rollout Programme in Manchester

This application is part of wider scheme of InLink implementation across the City of Manchester. Twenty-three sites were submitted for planning consideration on 4th December 2017. This application is one of a further sixteen sites now submitted as a second tranche, bringing the total to thirty-nine. This follows extensive pre-application engagement with the LPA as detailed later in this statement.

The application package also includes a rationalisation schedule, which sets out the locations of existing BT KX100 kiosks which are to be removed as part of the roll out of InLinks, either through conversion or by removing kiosks in proximity to new sites. This will help to deliver a comprehensive network of connectivity within the borough whilst decluttering the streetscene and removing 'hotspots' of anti-social behaviour.



Proposed InLink Locations



Total Associated BT Kiosk Removals

Blue = 1st tranche; Yellow = 2nd tranche

InLink Technical Information

InLinks are free-standing structures featuring digital display screens on two sides and a user interface based around an android tablet. The overall dimensions are 787mm wide by 280mm deep at ground level, and 889mm wide by 280mm at the top of the unit. The narrower base reduces the street footprint further and gives a slender, elegant appearance. The total height of the InLink is 2895.6mm. See Figure 2, below.

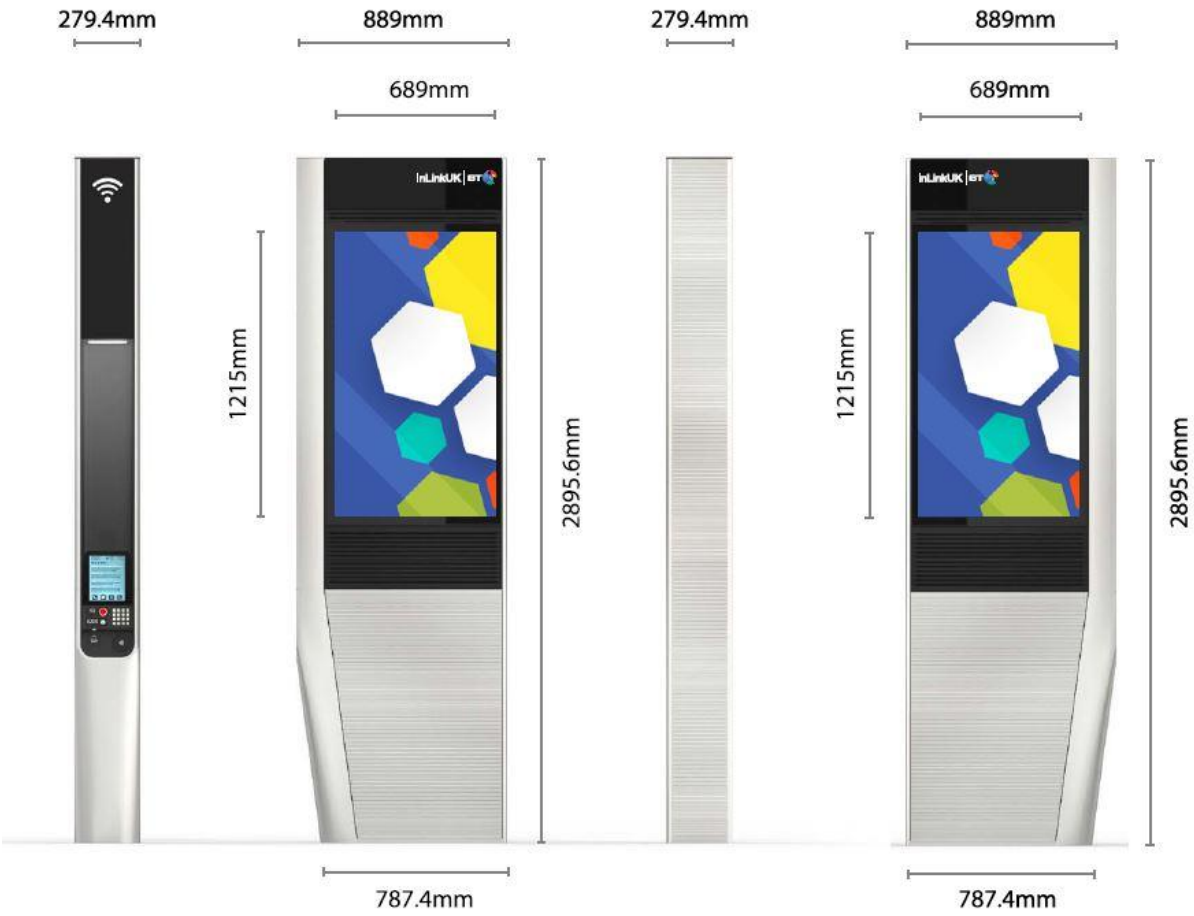


Figure 2 - Elevations and Dimensions on an InLink

Design

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 world, to creating a high

value advertising programme in harmony with its surroundings that will set the standard for quality content and context relevance for the next decade.

InLinks are durable and robust, yet elegant and timeless looking. The tall and slender proportions, accentuated by the material treatment, result in a clean and aesthetically pleasing structure. The initial monolith design has evolved to articulate the interactive face of the InLink by tapering its side, a gesture that invites users to step up to the interactive panel. The touchscreen looks up, welcoming the user, while the small "privacy wings" give a sense of personal space without enclosures that invite anti-social behaviour. Integrated lighting above the interface panel illuminates this area, giving a sense of comfort and safety to the user when it is dark.

Accessibility

InLinks have been designed to be accessible to all users, regardless of their physical or technological capabilities. The top of the customer interface screen is placed at 48" to accommodate wheelchair users. A tactile numbered keypad, emergency button, and high-contrast large type labels help the visually impaired. Braille and audio instruction are also available, and a hearing loop is integrated for the hearing impaired. The touch screen interface is designed to feel familiar to consumer tablet products.

InLink's Tablet

We have chosen the world's most popular operating system, Android, as the tablets on our InLinks, enabling us to embrace the leading mobile developer community. The open source licensing will ensure continued support and advancement over the next decade.

We have taken the approach of restricting general web browsing; instead we are providing key, transactional applications to help residents, visitors, and city workers go about their day. Currently we have tiles that connect through to apps that give access to information including maps for wayfinding, BT's phone book

and enabling access to the Council's services on their website. We will also look to work with partners to develop new apps to provide meaningful, local information.

Free calls to mobile, local and national numbers

InLinks allow users to make free calls to mobile, local and national phone numbers. A resource for everyone from those without mobile phones, those on limited plans, and whose mobile batteries are dead and need to make a quick call. LinkNYC logs over 21,000 calls made each week.

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

We have provided users with two different methods of voice communications. We intentionally designed InLink without a handset, as that is often one of the first features to be vandalized on traditional payphones. Users can make a call utilising InLinks 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. In addition, the speaker volume is automatically reduced at night. 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. Users may also choose to plug in a standard headset or earphones into the built-in headphone jack in for additional privacy.

Calls to the Emergency Services

Each InLink features an emergency services '999' button that connects users in an emergency to the relevant services. 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.

Fast Charging

As a further convenience, we are providing two marine grade, waterproof USB ports featuring Quick Charge 2.0. 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.

InLinks Digital Screens

InLinks screens show a set of rotating content, and it is anticipated that our dynamic digital displays will show local house content (hyper-local community content supplied and created by InLinkUK) for about 5% of the time. InLinks are more than just an advertising screen— they are meant to serve as a key point of reference for local information and as an asset to the community.

We are then anticipating that for 70% of the time we will be showing commercial content from businesses, including local SME's. There may be situations where this changes depending on local events and who has booked space, but it is always our intention to have a variety of advertising content that engages the audience.

The InLink screens' unique scheduling structure means that there is no fixed display. Advertisements and content are played out on a 'share of time basis', meaning that the content of displays fluctuate throughout the day, allowing presence at the most relevant positioning.

Manchester City Council will have 5% of screen time allocated to promote and educate. This can include upcoming popular events/warnings, important information for those who live or visit the Manchester area.

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 allows 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.

We are also currently running real-time Transport for London (TfL) tube travel information in London, and are exploring with TfL how we might be able to incorporate other transport information to help Londoners get around the city. We are actively engaged with TfGM in a similar regard for Manchester. In addition, we are currently displaying the local weather information.

In the future we are looking for other open API's to allow us to create further localised content relevant to the community. InLinkUK's designers also create content throughout the year relating to key events and holidays e.g. Christmas and Valentine's Day.

Energy Conservation Approach

For the design of the InLink itself, we prioritised energy efficiency as one of our main design drivers. At every turn, we have optimised power efficiency for a triple win-to reduce the carbon footprint of the InLink, to lower the operating costs, and to reduce the heat generated by the units.

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 aluminium for better thermal dissipation

- High-efficiency power supplies providing 80% or better efficiency, compared to 65-70% of typical components.

Screen brightness to dim at dusk

Our back-to-back 55" digital advertising displays are bright enough to be viewed in direct sun but also auto-dim so that they remain in harmony with the streetscape as the light changes during the transition from day to night.

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

Benefits - Improving the streetscape with smart city technology

Below is further information on the technology in terms of its current functionality, and where we anticipate InLinkUK to be in terms of our future developments for smart cities.

Smart City Sensors and Data

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.

Currently LinkNYC are trialling air quality sensors and we anticipate these will be available for trial in the UK in the near term.

This kind of data is most powerful when shared with the community, and we would look to make these urban insights readily available to the community—everyone from policy makers to app developers. We want to make the data which supports improving the quality of life for residents in Manchester free and available to interested groups and organisations.

In the future, we are anticipating introducing sensors that can monitor things like:

- 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 sensor and data information we can provide to improve public well-being and health in cities.

Decluttering the streets

An InLink's footprint in comparison to an existing payphone kiosk covers 75% less surface area on the pavement; see Figure 3. Through a collaborative approach with BT's payphones team we are looking to rationalise the current estate in Manchester which currently stands at 508; removing more payphones than InLinks being installed.

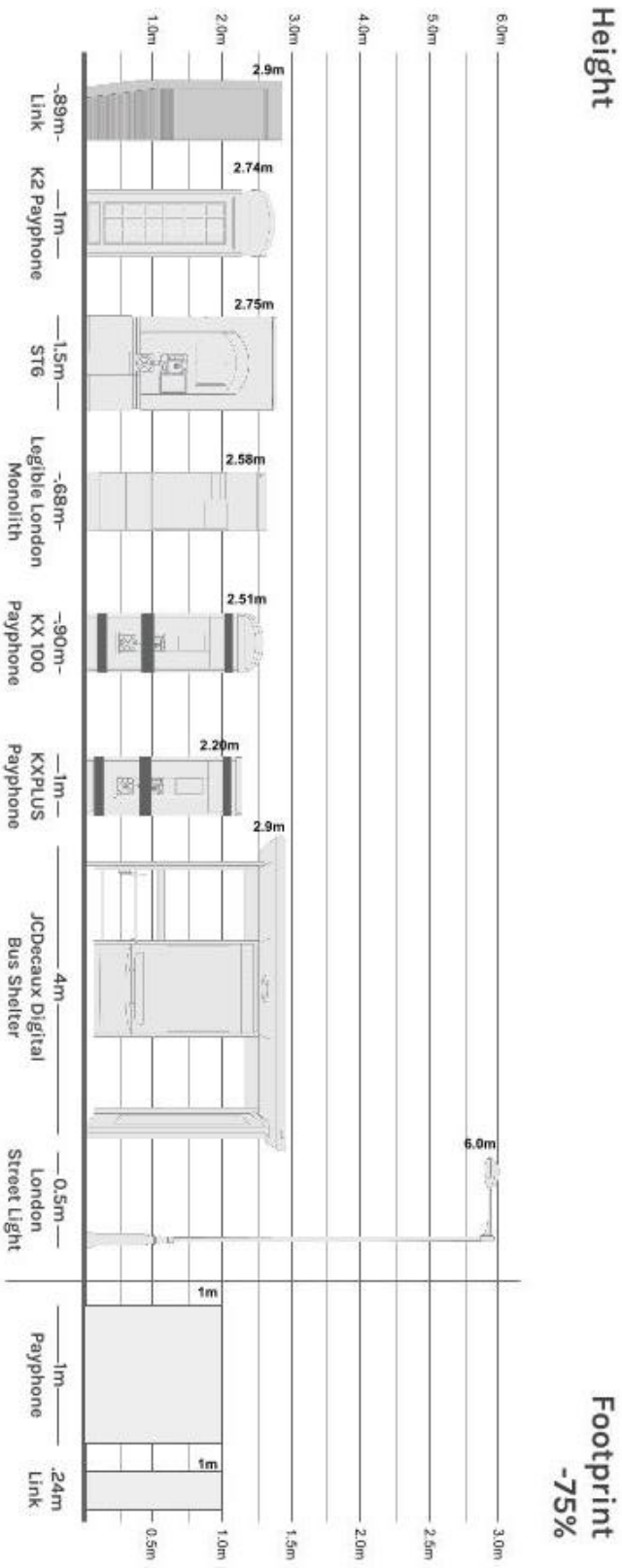


Figure 3 - Height and footprint comparison graph

Delivering the best possible resident experience by reducing street clutter is a key objective for planners, and InLink's roll out has the ability to support the reduction in BT's current estate.

Connectivity through gigabit Wi-Fi

InLinkUK's Wi-Fi is a fibre service enabling speeds up to 85 times faster than standard broadband for people to use for free. A gigabit Wi-Fi enables you to:

Comparative Download Speeds

		Download speed		
Media	Approximate Size (MB)	**1Gbps (1,000 Mbps)**	50 Mbps[2]	5Mbps
5 minute video	30	**0.24 seconds**	0.48 seconds	30-40 seconds
45 minute TV show	200	**1.6 seconds**	30 seconds	3-5 minutes
5 hour playlist	300	**2.4 seconds**	48 seconds	8 minutes
2 hour film	1,500	**12 seconds**	4 minutes	18-24 minutes
2 hour HD film	4,000	**32 seconds**	10.5 minutes	54-72 minutes

Downloading a film can take as little as 30 seconds on free gigabit Wi-Fi, 20x faster than on a 50 Mbps connection

Figure 4 - Comparative Download Speeds.

Signing on to InLink's Wi-Fi is done through a one-time email address registration which then connects you to the Wi-Fi whenever a user is in range. We do not sell these email addresses on, and have a customer-first policy to create the best experience possible for our users.

In New York, where LinkNYC launched in 2016, New Yorkers have used over £21m worth of data since the first InLinks were installed. Currently there are 800 InLinks in the ground, and as coverage increases the benefits for residents, workers and tourists will increase through this incredible service.

The InLink's Wi-Fi also has in place content filtering, so accessing websites that are only suitable for adults will not be possible through our service.

We believe that the residents of the UK's major cities, including people who work and visit will benefit hugely from accessing this type of free service.

With investment across both the US and UK, we will continue to develop and leverage the most up to date technology so that we can increase the speeds of the Wi-Fi in the future when the capabilities of the access point technology increases.

Advertising for businesses of all sizes

Primesight is responsible for all of the paid for messaging that appears on InLink screens. The revenue made from paid content enables the roll out of InLinks and further investment in this technology.

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

Materials and Maintenance of an InLink

The main casing of an InLink is aluminium, 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 aluminium. These high quality materials hold up to abuse and vandalism, ensuring the longevity of the InLink.

Maintainability and durability were key considerations in the design of the InLink. The modular design of exterior and interior components means that servicing damages or basic wear and tear is simple and economical, since parts can be easily removed and replaced. Large metal face panels were given a surface texture which, while being visually interesting, also diminishes the appearance of scratches.

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.

Installation of InLinks

Once the appropriate permissions have been gained for road the installation, we will progress with the removal of payphones, ground preparation and installation of the unit 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.

Site Information

The application site information is detailed below:

SSP Ref	MNC-003
Address	Brown St (Opp No.58 Tesco and H&M Jct Market St)
Postcode	M1 1PW
Lat/Long	53.482415, -2.241615
Conversion/New Site/Relocation	Conversion
Conservation Area	Upper King Street
Proximity to Statutory Listed Buildings	N/A
Existing Kiosk to be Removed 1	4 Kiosks at Brown St (Opp No.58 Tesco and H&M Jct Market St)
Lat/Long	53.482415, -2.241615
Existing Kiosk to be Removed 2	
Lat/Long	

Consultation and Key Stakeholder Engagement

The applicant has engaged in a detailed pre-application process over a number of months. This has included engagement with both the Local Authority including planning and highways teams in addition to liaising with Transport for Greater Manchester (TfGM).

Discussions and meetings have taken place with Tony Mitchell - City Centre Team and Neil Bayliss-Rowe - Highways to identify sites that are acceptable in principle. It has also been agreed that the InLink locations will not have detrimental impact on heritage/conservation due to their siting and relationship with any listed buildings, and that they are simply items of street furniture.

Alongside this, a meeting was held with TfGM to consider the InLinks in relation to their proposed wayfinding totems to agree suitable locations for each proposed development and to avoid a proliferation of street furniture. Comments have also been received from James Kearns at Manchester City Council to confirm that the proposed InLinks are in appropriate locations to ensure the future operations of the Christmas Markets is not compromised.

This application is one of an initial thirty-nine sites, which have been considered to be appropriate following these pre-application discussions. The first tranche of twenty-three sites were submitted on 4th December 2017. The remaining sixteen are now submitted as a second tranche. This forms part of the first phase of the roll out of InLinks in Manchester.

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.

NPPF

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.

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.

Local Planning Policy

Manchester Unitary Development Plan (1995) Saved Policies
Saved UDP Policy 15 relates to advertisements, hoardings and posters and sets out criteria that such development will be assessed against in order to consider the interests of amenity and public safety. To assess the interests of amenity and safety the council will consider the following criteria:

a. developments of this kind should not harm the character or architectural features of a building, nor interfere with its proper use;
b. they should be in scale with the locality and relate properly to the site on which they stand;
c. they should be unobtrusive and should not intrude into residential neighbourhoods and areas of high amenity value; and
d. a proposal which would be injurious to public safety or adversely affect the flow of traffic, by reason of its position, size, or design will not be permitted.

With regards to free standing hoardings, the council will take account of:

a. the general location of the proposed development and the effect on visual amenity;

b. the scope for posters and hoardings to make a positive contribution to the locality;
c. the design of the structures, and the relationship with any premises on which they are located;
d. the effect of the proposal on permanent redevelopment of the land;
e. public safety resulting from the positioning of the design of the display;
f. the ease with which the structure is capable of being satisfactorily maintained;
g. the use of hoardings to screen vacant sites or buildings during development, or where development is known to be imminent;
h. the use of hoardings as part of a scheme to prevent access by unauthorised users onto land pending development;
i. the use of hoardings to disguise or improve the appearance of unsightly features, operations or activities; and
j. the number of advertisements in the locality and their cumulative effect on visual amenity.

Manchester Core Strategy (2012)

Spatial Objective 2

Spatial Objective 2 sets out that the Core Strategy will support a significant further improvement of the City's economic performance and spread the benefits of this growth across the City to reduce economic, environmental and social disparities, and to help create inclusive sustainable communities.

Policy EC1

Policy EC1 relates to employment and economic growth in Manchester and sets out priorities for ensuring continued economic growth. This includes improving digital infrastructure delivery to businesses and residents as well as ensuring the continued social, economic and environmental regeneration of the City.

The policy continues by setting out that development proposals should ensure the design makes the best possible use of the site in terms of efficient use of

space; enhancing the sense of place of the wider area and minimising detrimental impacts on adjacent uses; considering the needs of users/employees for access via walking, cycling and public transport and reducing the opportunities for crime by applying current best practice in security design.

City Centre Policy CC1

City Centre Policy CC1 sets out that the provision of a range of economic development uses such as retail, leisure, entertainment, cultural and tourism facilities will be encouraged in the City Centre to support the development of a vibrant employment location attractive to businesses, employees and visitors to the City Centre. New and the enhancement of existing infrastructure provision which supports the agglomeration role of the City Centre will be supported.

City Centre Policy CC4

Policy CC4 relates to tourism, culture and leisure and sets out that the City Centre will be the focus for culture and leisure in the City Region therefore proposals to improve the appearance, use and accessibility of all cultural and visitor attractions and associated facilities will be supported. The improvement of facilities for business visitors will also be supported. Development in the City Centre which improves facilities for visitors, including Manchester residents, will be promoted.

City Centre Policy CC9

Policy CC9 relates to design and heritage. Development in Manchester City Centre should preserve or enhance the heritage assets that have been identified, including listed buildings, conservation areas and scheduled ancient monuments.

Siting Justification against Planning Policy

The siting criteria used to site each InLink in the network across the UK 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 in accordance with local policy requirements.

4.2 Justification of the siting of the InLink at Brown St (Opp No.58 Tesco and H&M Jct Market St) is detailed below against the local policy requirements:

4.3 **Character of the local street scene/context and amenity (NPPF para. 67, CC4, CC9, Saved UDP Policy 15)** – The site is located within the main retail district of the city centre in a highly commercial setting. The pavement is wide and there is sufficient space to accommodate the InLink without appearing cluttered. The InLink is of a high quality design and construction and it is considered that it would be entirely in keeping with the scale and character of its setting. As such, it is considered to be a positive addition to the street scene. It is proposed to remove two existing BT telephone kiosks as part of the overall scheme and this is considered to be to the benefit of visual amenity. The proposal as a whole is considered to have a significant positive affect on the areas affected.

4.4 **Reduction of street clutter (CC4, CC9, EC1, Saved UDP Policy 15)** – The InLink has a significantly reduced footprint when compared to conventional telephone kiosks and two KX100 telephone kiosks are proposed to be removed as part of the application as detailed above. The proposal would therefore reduce street clutter.

4.5 **Public safety, visibility splays and footway widths (NPPF para. 67, EC1)** – The position of the InLink would not interrupt any highway safety visibility splays or sightlines. The existing footway width would be increased due to the reduced width of the InLink over the KX100 kiosks that would be removed at the

site. The advertising screens would operate within the limits agreed on existing similar digital screens in the city (based on Waterman's/Transport for London safety guidelines as detailed above). There are no other apparent public safety issues.

4.6 **Protection of heritage assets (NPPF para. 67, CC9)** – The site is located within the Upper King Street Conservation Area. However, there are many modern elements within the street scene and the InLink is considered to be compatible with the character of the city centre location. It is considered that replacing the existing KX100 kiosks with the InLink, which is of a high quality design, would have a positive impact on amenity and the character of the conservation area. There is considered to be no adverse effect on any heritage assets.

4.7 **Provision of high quality telecommunications infrastructure (NPPF para 42-43, CC1, EC1)** – The InLink would clearly provide high quality telecommunications facilities as set out above. The proposed location is accessible to a large number of workers, tourists and residents as part of the wider InLinkUK network.

4.8 **Accessibility (CC4)** – The InLink is designed for accessibility as set out above. The location has sufficient footway widths and is appropriately positioned to allow maximum accessibility to users.

Conclusion

InLinkUK has the potential to significantly enhance the provision of local community communications facilities and services (Sec. 5 of NPPF, CC1 and EC1).

InLink's are of a high quality, accessible design that would be a revolutionary improvement over the existing kiosks (CC4 and CC9).

The application InLink would be located within an appropriate context (NPPF para. 67, CC4, CC9, Saved UDP Policy 15); it would reduce street clutter (CC4, CC9, EC1, Saved UDP Policy 15); it would maintain sufficient footway widths and visibility splays (NPPF para. 67, EC1); would not adversely affect heritage assets (NPPF para. 67, CC9); and, would not otherwise adversely affect amenity or public safety.

Therefore, the proposal is considered to be accordant with the relevant policy framework and would not adversely affect amenity or public safety. As such, it is considered that Planning Permission and Express Advertisement Consent should be granted.