

# InLinkUK

**SUBMISSION IN RESPONSE TO  
DRAFT LONDON PLAN**

**Non-Confidential | March 2018**

The Right Honourable Sadiq Khan  
Mayor of London  
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## Submission in response to draft London Plan

Mr Mayor,

Thank you for the opportunity to respond to the draft London Plan and your efforts to focus on good growth by taking a holistic approach and utilising all the levers we have in London to shape our city for the better, built around the needs, health and wellbeing of all Londoners.

For the benefit of everyone we need to ensure that growth in London helps us achieve a city that is more walkable, more affordable, and better connected, but which also takes full advantage of available digital technologies.

InLinkUK is a small, relatively young London-based technology start up company that is working to connect and improve local streets throughout the city and around the country. We are a joint venture between technology company Intersection, which is supported by Alphabet (the parent company of Google), and Primesight, a leading UK out-of-home media company.

We work in 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.

InLinks themselves provide communities with the fastest and most robust free public Wi-Fi, along with a range of other digital services which not only support visitors, residents, and business, but also reduce the demand for local authorities to invest in such services.

Our work involves considerable engagement with local authorities and communities throughout London on how technologies like InLinks are improving the city and how our growing roll out program is improving digital connectivity and returning valuable pavement space in each area.

This submission provides an overview of what we have learnt to date and how this can be used to further improve the London Plan and achieve good growth for our city.

Kind regards,

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**General Manager**  
**InLinkUK**

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## About us

InLinkUK is a London-based technology company working in exclusive partnership with BT to ensure urban areas are well-served in the digital age through the roll out of InLinks and to rationalise their network of payphones, with two removed for each InLink installed.

The InLinkUK from BT service is delivered through a collaborative approach, with local councils engaged to assist in identifying payphones for removal and all InLink locations approved through the planning process before any works occur.

Since June 2017 we have had more than 100 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. This includes creating spines of connectivity along key routes for the more than 50,000 users already subscribed to the service and enough data used to visit over 88 million web pages.

## What is an InLink

At no cost to taxpayers or end users, InLinks provide communities with an unprecedented suite of essential urban tools, including free ultrafast Wi-Fi for everyone, free phone calls to anywhere in the UK, 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.

InLinks have been designed to be sensitive to their context both in terms of the built environment and the people who use it.

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.

For more information see Appendix A.





## Supporting the good growth of London

The payphone has been a part of London and its identity for over a century, with the iconic K2 and K6 red telephone boxes symbolising british design and connectivity throughout the world.

This connectivity continues to drive London's position as a global capital as well as being a key factor why so many people want to stay in and move to the city despite its challenges around areas like road and pavement congestion, air quality, and affordability.

It is therefore essential that London stays at the forefront in an increasingly digital world while ensuring the city uses technology to serve its communities. To not do so risks losing the best talent, limiting business investment, and generally making the city a less interesting and liveable place to live.

**We support the Mayor's efforts to deliver good growth for London** and we are keen to share our expertise on how technologies like InLinks are improving digital connectivity and reducing clutter on local streets throughout the city.

The following sections provide our responses to those areas of the draft London Plan most relevant to our expertise. Should the need arise, we are more than happy to elaborate further on any of the points made.



## Policy GG1 Building strong and inclusive communities

Diversity is a key strength of London with its physical environment for centuries providing countless opportunities to connect with those who share our interests, cultures, and beliefs.

Like the introduction of the telephone, in recent decades the physical environment has been complemented through the use of digital technologies such as the internet and smartphones that have further helped people connect to those around them

While the internet and social media connects us to our friends and families both within and outside of the city and overseas, easy access to such services is not universal. Unfortunately many visitors and residents of London simply do not have the physical access or financial resources to make the most of advances in digital technology.

This includes the need for such technologies and their locations to be fully accessible for those who may be disabled or otherwise restricted.

It is important that the London Plan reflect that digital connectivity is now essential to building on the city's tradition of openness, diversity, and equality, and to help deliver strong and inclusive communities.

### **Recommendation #1**

- *That Policy GG1 be updated to ensure those involved in planning and development must seek to enhance levels of digital connectivity in London*

While compromise is a necessary part of change, it is critically important that physical change and development in London is a net-positive in terms of our physical space. For example, for each InLink we install we remove two existing BT payphones in the area, allowing us to give back valuable pavement space to the community.

Similarly, additions to our streetscapes should be able to grow with the the city as InLinks can through the future inclusion of additional environmental sensors, 5G small cell technology, and much more based on ongoing assessments of community needs.

Too often development in London has instead been deemed as compliant with applicable rules at the time but nonetheless represents a net-negative contribution to the city and its people.

### **Recommendation #2**

- *That Policy GG1 be updated to ensure those involved in planning and development must seek to ensure any changes to the physical environment make an overall positive contribution to London.*

## Policy GG2 Making the best use of land

London already provides numerous world-leading examples of how to create high-density, mixed-use places that make the best use of available land. Unfortunately these are too often compromised by types development that were not envisaged for the area but are nonetheless technically compliant with the applicable rules.

Many of these developments diminish the value of nearby public spaces and can discourage people from using local streets (e.g. through large, blank walls and reducing passive surveillance). This is directly counter to the aspiration of good growth, and the target of having 80 per cent of all journeys using sustainable modes of travel.

The rules themselves can also be too restrictive, with planners and councillors limited in their ability to consider the overall benefits of a wider scheme of applications or effectively consider creative proposals not thought of when the rules were conceived.

### **Recommendation #3**

- *That Policy GG2 be updated to ensure those involved in planning and development must seek to look beyond technical compliance in the interest of delivering good growth.*

If London is to succeed then it must also find more suitable solutions for its streets and public spaces that deliver clearer community benefits. If the goals of the London Plan to achieve a higher-density and more liveable city are to be achieved then we must proactively investigate far greater pedestrianisation of key areas, and improved prioritisation of walking in other areas.

This must be evidence-based and planned with careful management of access for the less abled, necessary deliveries, and delivered in open consultation with the community.

### **Recommendation #4**

- *That Policy GG2 be updated to ensure those involved in planning and development must proactively explore greater pedestrianisation of key areas and improved prioritisation of walking in other areas.*

The introduction of additional street 'furniture' is also problematic to these goals, particularly where they result in a net-reduction to the amount of available pavement space and provide unreasonable obstructions to pedestrian flows. Whilst there are opportunities in many central areas such as Tottenham Court Road, it is especially important in many of London's older and more narrow streets where the emphasis should be on street clutter reduction.

### **Recommendation #5**

- *The London Plan should reflect that anything added to the streets of London should be associated with a net-increase in available pavement space and not unreasonably disrupt the movement of pedestrians.*

## Policy GG3 Creating a healthy city

The physical environment is one of the key barriers to improving the health and reducing health inequalities of Londoners, with considerable achievements already made through projects like the Santander Cycles, Congestion Charge Zone, and the upcoming Ultra Low Emission Zone.

Central to supporting these activities and making London a healthier city involves considering how easy or hard its physical environment makes it to choose a more sustainable mode of travel.

As noted, London needs to become a significantly more walkable city if it is to successfully become a higher-density and more liveable city while also achieving the targets for sustainable travel.

This will also make a significant contribution to improving air quality in central areas of the city with a large portion of particulate matter and other pollutants coming from motorised transport. Air quality monitoring and the local near-real time communication of data will also be able to assist in helping people make healthier travel choices.

### **Recommendation #6**

- *That Policy GG3 be updated to ensure those involved in planning and development must proactively explore greater pedestrianisation of key areas and improved prioritisation of walking in other areas.*



## Policy GG5 Growing a good economy

As we move further into a digital world it is essential that connectivity be key factor when considering how to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners. We're contributing to this goal by connecting streets and communities throughout the city to the fastest and most robust public free Wi-Fi service in the UK, with additional full fibre installed to provide the ultrafast speeds of up to 1 Gbps, a Wi-Fi range of over 100m from each InLink

The Mayor of London's upcoming Smart London Plan will be central to these considerations, however the intelligence of an environment and its physical form should not be considered in isolation from each other. For example, it would be counterproductive to plan a housing development, office project, or high street renewal without also considering the digital connectivity of those who will be using it.

To deliver good growth in London it is critical that the London Plan activity consider issues of connectivity and that it is closely integrated with the coming Smart London Plan.

### **Recommendation #7**

- *That Policy GG5 be updated to ensure those involved in planning and development must seek to enhance levels of accessible digital connectivity in London*

## Policy GG6 Increasing efficiency and resilience

We fully support London becoming a zero carbon city by 2050 as well as efforts to make it a more efficient and resilient city, however more needs to be done to proactively communicate progress against the goals (e.g. using outdoor advertising, etc).

Put simply, it should not rely on someone seeking out the information to understand (and be inspired by) progress that is being made to deliver good growth in London.

### **Recommendation #8**

- *That Policy GG6 be updated to ensure those involved in planning and development must seek to more activity communicate progress against goal such as London becoming a zero carbon city by 2050*

## Policy D1 London's form and characteristics

London has some of the most beautiful buildings and most vibrant public spaces in the world which advances in technology should seek to enhance. The city should continue to seek to be a high-density (but not necessarily high-rise) and walkable city that respects its heritage while welcoming new and innovative interventions.

This can be seen with West End theatres using digital displays on the front of their buildings to promote shows in buildings that have been entertaining Londoners longer than any of them have been alive. The reverse can also be seen with many streets cluttered with payphones, connection boxes, and redundant equipment that no longer serves a purpose or would be installed differently if done today - in many areas InLinkUK are looking to remove BT payphones from streets with narrow pavements and only apply for InLink sites where they will not interrupt pedestrian flows.

In implementing good growth under the London Plan, Development Plans, area-based strategies, and development proposals should also be expected to consider the impact their actions will have on the existing and potential digital connectivity of an area.

It should be seen as wholly unacceptable for a proposal to cause mobile signal or internet access to be below what was previously available. In fact, opportunities should be taken wherever possible to deliver ultrafast and robust internet access for all Londoners (such as the ultrafast Wi-Fi provided for free to all users through each InLink).

### **Recommendation #9**

- *That Policy D1 be updated to ensure the form and layout of a place should not inhibit improvements in digital connectivity.*

### **Recommendation #10**

- *The Policy D1 be updated to ensure that development design should not inhibit community benefits from improvements in digital connectivity.*

## Policy D2 Delivering good design

As we live with the legacy of poor design decisions for decades (if not longer), we welcome measures such as public competitions and review panels to increase the level of design scrutiny for development in London.

However, making the right design decisions for London relies on having the right kinds of data, so it is essential that we consider both the historical and future needs of the city when considering what boroughs should be evaluating.

### **Recommendation #11**

- *That Policy D2 be updated to ensure that evaluations also take into consideration existing and potential digital connectivity infrastructure*

## Policy D3 Inclusive design

London should seek to be accessible for all users of all abilities, with this being especially important as densities and reliance of digital technologies increase over time. For example, if a new building is likely to disrupt local mobile signals or locations services, they should be expected to take this into consideration. Accessibility in to buildings is also essential to support London and the people visiting and living here.

Since inception InLinks have been fully-accessible in the design and features; we believe it should be the same for all new development projects and, where possible, all redevelopment projects as well.

### **Recommendation #12**

- *That Policy D3 be updated to ensure development proposals consider their impact on digital infrastructure and services.*

## Policy D6 Optimising housing density

Optimising density should not be at the expense of good design or the effective provision of digital services to an area. Similarly, the physical and digital connectivity of an area should be considered as early as possible in the design process and not left as an afterthought or something needing to be retrofitted at a later stage.

### **Recommendation #13**

- *That Policy D6 be updated to ensure increases in density are accompanied by an increase in digital connectivity.*

## Policy D7 Public realm

As seen with the extensive provision of free public Wi-Fi in cities throughout the world, considerations of digital connectivity are an important element in the provision of successful public realm improvements.

Connectivity in cities should be multi-layered and accessible for all. From public Wi-Fi to good mobile coverage, everyone in London should be able to go about their daily lives with the best possible digital connectivity.

There is an increasing expectation for connectivity anywhere, therefore by definition we require connectivity everywhere. Which includes custom solutions for higher concentration areas, to ensure a basic service can be preserved even at peak times.

### **Recommendation #14**

- *That Policy D7 be updated to ensure Development Plans and development proposals should consider the provision of digital connectivity in the area.*

As displayed by our approach to remove two payphones for each InLink installed, we are particularly supportive of the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Similarly, planners should be provided with sufficient information to effectively consider (and base decisions upon) how any proposal does or does not improve pedestrian amenity.

### **Recommendation #5 (repeated)**

- *The London Plan should reflect that anything added to the streets of London should be associated with a net-increase in available pavement space and not unreasonably disrupt the movement of pedestrians.*

## Policy D10 Safety, security and resilience to emergency

In addition to more traditional threats, in an increasingly online world it is important to consider emergencies relating to our digital infrastructure. For example, a cyber attack on our transport network has the potential to be far more disruptive and dangerous than a fire or flooding.

### **Recommendation #15**

- *That Policy D10 be updated to ensure it also highlights that London should be resilient against digital infrastructure related emergencies.*

London also contains an increasing amount of private digital infrastructure, ranging from sensors to the screens and interfaces available on InLinks. This infrastructure can assist the Mayor can assist in ensuring and maintaining a safe and secure environment in London.

We are currently developing the updates that would allow for the overriding of InLink screens in an area for the issuing of warnings and information by police and other relevant authorities.

### **Recommendation #16**

- *That Policy D10 be updated to ensure the opportunity provided by London's digital infrastructure are fully utilised.*

Similar considerations should be given to the streetscape with initiatives seeking to reduce excess street clutter given broad support to ensure the emergency services and other responders are not unnecessarily restricted from accessing an area or scene.

## Policy E10 Visitor infrastructure

Seeing tourists using paper maps is becoming less common in cities like London as more people rely on their mobile phones and other devices to navigate their way around. wherever they may be visiting. This trend has made affordable digital connectivity an essential element of visitor infrastructure.

Providing areas and spines or free/affordable digital connectivity is now an important factor in ensuring visitors have a positive experience of London. Fortunately the private sector is willing and able to assist in providing such services, and reducing pressure on taxpayer funds.

### **Recommendation #16**

- *That Policy E10 be updated so that technologies and services providing digital connectivity are recognised as key forms of visitor infrastructure.*

## Policy HC6 Supporting the night-time economy

London's night time economy is central to its success as a truly global city, with this having been strengthened over the years through the relationship between advances in technology and our physical environment.

In our increasingly digital age the simple act of someone losing digital connectivity by no longer having access to their mobile phone (through low battery, loss, theft, no signal, etc.) can weaken their willingness to participate in the night time economy. Similarly, the mere threat of losing digital connectivity can limit a person's interest in participating.

Capitalising on existing and emerging information technology is a key opportunity for improving London's night time economy. Central to this is improving the provision and use of transport infrastructure, capitalising on the benefits of improved digital connectivity and improving upon perceived and actual threats to a person's safety.

There are a range of ways we can use digital technology to improve connectivity and safety in London's night time economy for the benefit of all. For example, seemingly simple tools like Citymapper and the open sharing of Transport for London travel information have fundamentally improved how people use and navigate the city at night.

Similarly, the improvements in digital connectivity through services like the free Wi-Fi and calls provided by InLinks and other services allows users of the night time economy to have more varied and safer experiences.

### **Recommendation #17**

- *That Policy HC6 be updated so Development Plans, town centre strategies, and planning decisions should seek to improve levels of digital connectivity available to all those involved in the night time economy of London.*





## Chapter 8 Green infrastructure and natural environment

We support the protection and enhancement of the natural environment in and around London, but also believe it is important that governments and companies consider the overall impact of their activities and not just their localised impacts.

An example of this is that while InLinks give off no local pollutants, from day one every InLink has been powered by 100 per cent carbon free from renewable energy, allowing us to significantly lower our potential ecological footprint overall.

It is essential that the London Plan protects the overall natural environment and not just that contained within the city boundaries.

### **Recommendation #18**

- *That all relevant policies within Chapter 8 be updated to ensure environmental considerations relating to London take into account overall ecological impact both within and outside of the city.*

## Policy SI1 Improving air quality

Creating a denser and more walkable London that is less reliant on vehicles that release harmful emissions will go a long way to improving air quality in the city.

We support efforts to make developments air quality positive wherever possible, but believe more needs to be done to provide the public with accessible information on their immediate air quality situation (i.e. what is the air quality on their street at the time).

### **Recommendation #19**

- *That Policy SI1 be updated to ensure opportunities for more detailed monitoring and communicating of air quality data to the public are explored by the Mayor.*

## Policy SI6 Digital connectivity infrastructure

As providers of the fastest and most robust free public Wi-Fi service in the UK and facilitator numerous other examples of digital connectivity (see Appendix A), we are fully supportive of the measures detailed in Policy S16 on digital connectivity infrastructure, but also firmly believe such considerations must not be treated in isolation.

As noted in the above recommendations and given its importance to how most people live, work, and interact with the city, it is essential that digital connectivity be considered as an integral element to all relevant areas of the London Plan and similar documents.

Treating connectivity different to physical performance, affordability, and development considerations would not represent good growth and threatens London with a greater chance of missed opportunities and having to deal with substandard outcomes from unnecessarily isolated thinking.

### **Recommendation #20**

- *That the measures in Policy SI6 be more fully integrated into all other relevant areas of the London Plan.*





## Chapter 10 Transport

InLinkUK supports a transport hierarchy that sees walking and other sustainable modes of travel prioritised and the use of single occupancy private vehicles discouraged. In doing so we fully support the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle, or public transport by 2014.

As noted above, this must be supported through far greater pedestrianisation of key areas, and improved prioritisation of walking in other areas.

London is a leading city in the use of digital technologies and connectivity to improve transport infrastructure and the individual travellers experience, however much more can be done in this regard for the benefit of all Londoners.

### **Recommendation #21**

- *That all relevant policies within Chapter 10 be updated to ensure considerations of transport in London take full advantage of available digital technologies.*



## Chapter 11 Funding the London Plan

The draft London Plan acknowledges a significant gap between the public-sector funding required to deliver and support London's growth and the amount currently committed to the city. Similarly, public funds are obviously not limitless and opportunities to receive private sector support for implementing the London Plan will need to be explored.

InLinkUK provides its many services at no cost to the taxpayer or the councils.

Initiatives such as the InLink roll out are the kinds of private sector initiatives that are aligned to the ambitions of the Mayor and are able to assist in delivering key elements of the London Plan.

### **Recommendation #21**

- *That Chapter 11 be updated to ensure there is a clear channel of communication so private sector activities can be better aligned with the London Plan where possible..*

## **Working together for a better London**

As a London based business and supporters of the Mayor's efforts to deliver good growth who are helping to connect and transform local streets throughout the city, we are keen to contribute where we can to implementing the London Plan.

The sections above have provided our responses to those areas of the draft London Plan most relevant to our expertise. Should the need arise, we are more than happy to elaborate further on any of the points made and can be contacted through [hello@inlinkuk.com](mailto:hello@inlinkuk.com).





## Appendix A: Additional InLink benefits

In addition to helping connect local streets and communities to the fastest and most robust public Wi-Fi in the UK, the installation of InLinks provide:

- **438 hours of council content** on the screens of each InLink per year to promote local initiatives, news, and events (see the Camden Case Study below for an example)
- **Touchscreen tablets** to access council services, BT's phone book, maps and directions
- A **fully-accessible** design with a maintenance regime that includes **bi-weekly cleaning** and the ability to rapidly respond in the case of accidents and vandalism
- Secure power-only USB ports for **rapid device charging**
- **Free phone calls** to anywhere in the UK (mobile, local or national numbers) using the tablet and microphone, with the option to plug in your personal headphones for more privacy
- **Direct 999 call button** with location sharing two-push approach to limit accidental activation
- The opportunity to integrate **additional environmental sensors** in collaboration with government including on:
  - Air quality (under trial),
  - Pedestrian flow monitoring,
  - Traffic Movement, and
  - Other environmental factors.

As part of the InLink roll out, their installation also facilitates and funds the removal of two existing BT payphones. Combined with the small footprint of an InLink this allows us to give back 1.78m<sup>2</sup> of valuable pavement space to the community for each InLink installed.

In New York the LinkNYC service found that customers were staying for longer and spending more money in businesses close to InLinks.

Smaller local businesses are also able to benefit from targeted advertising on nearby as has been seen in the Jamaica area of Queens where in partnership with the local BID a range of businesses were able to engage with existing and potential customers.

Finally, we are also working to roll out the ability to override the screens in emergency situations, providing an additional opportunity for authorities to provide important notices to those nearby (e.g. in the event of a terrorism incident or a building safety issue).

## Appendix B: Community Safety in Camden Case Study

In addition to our own community messaging, every InLink provides to each Council a share of screen time which is available to promote local activities, events, and other matters of public interest.

We are also working with the Police to maximise the benefits of the InLinks and provide for safe communities. An example of this was our working with Camden Police Safer Neighbourhood Team in October 2017 to help raise awareness of the threat posed by phone snatchers on mopeds.



Tweet from Camden Town Police (@MPSCamandPrim)

Content was created for the campaign and included on InLinks in the Camden area, as seen on this one with PC Davies just by Camden Town Tube.

Over the course of the campaign there was a significant reduction in the number of phones reported stolen, with our team now looking to roll this and similar campaigns out in other areas.