

## **WRITTEN EVIDENCE: LONDON PLAN DIGITAL CONNECTIVITY INFRASTRUCTURE GUIDANCE CONSULTATION**

Response from: BusinessLDN, One Oliver's Yard, 55-71 City Road, London EC1Y 1HQ

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### **INTRODUCTION**

1. BusinessLDN is the business membership organisation with a mission to make London the best city in the world in which to do business, working with and for the whole UK. We convene and mobilise business leaders to tackle the key challenges facing our capital. We welcome the opportunity to provide written evidence to the GLA consultation: London Plan Guidance, Digital Connectivity Infrastructure.
2. A lack of connectivity limits access to education and economic opportunity, whilst making it harder for businesses to thrive. Better connectivity stimulates digital innovation which in turn drives investment and economic growth and enables local authorities to deliver and improve services more efficiently.
3. Good progress has been made over recent years by local authorities and network providers in deploying fast fibre and mobile connectivity in London, and also by the GLA to develop a data for London strategy and revamp the London data store. However, there is still more to do to bring network operators, developers and local government together to improve digital connectivity infrastructure in the capital, address not-spots, capacity constraints and network outages, and lay the foundations for the digitally enabled technologies of the future.
4. The following recommendations have been made against specific points within the DCI Guidance:

### **DEMAND FORECASTING**

5. The guidance refers to encouraging developers to plan on the basis of anticipated demand for network coverage. Demand for network coverage is extremely difficult to estimate with any level of certainty, given variables on occupancy rates in buildings, density of other nearby network infrastructure and remote working trends which all affect peak demand periods.
6. 1.3.3's recommendation for formal engagement between developers and network operators is therefore important, particularly with operators that maintain infrastructure in the nearby vicinity of a developer site so that planning applicants can ascertain the clearest possible information

on the connectivity options available. This will also help with future-proofing developments at an early stage.

7. Separately, further clarity is required about the meaning of 1.3.4 in relation to the role of LPA's in determining the conditions for connectivity in planning applications. For example, it is not currently clear how an LPA would enter into a legal agreement with developers on connectivity infrastructure.

## **ENGAGEMENT WITH NETWORK OPERATORS**

8. Greater clarity is also needed within sections 1.4.2 sub section, 3 and 4; specifically, whether the 250m rule for consultation on mobile connectivity applies to antennae only or whether it is applicable to low powered small cells too? The same applies to section 1.4.3; would a transport needs assessment apply to small cells as well as fixed antennae? We strongly support 1.4.5's guidance for dual path chamber design as standard which is critical for resilient network design.
9. We welcome 2.1.3 - 2.1.5's encouragement of engagement with nearby operators of network infrastructure. However, this drafting focuses on mobile infrastructure only. This should be extended to capture both fixed and mobile. The distinction between fixed and mobile is a false dualism, as all mobile connectivity is ultimately enabled by fixed infrastructure. To enable developers to identify which network operators to engage with, the DCI guidance should refer to the National Underground Asset Register (NUAR). NUAR is an initiative by the Geospatial Commission (now in Department for Science Innovation and Technology)<sup>1</sup>.
10. We agree with section 2.1.2 that development and street infrastructure proposals should optimise use of the public realm. Standardised London-wide policy on cabinets across boroughs should be developed as varying policies on cabinet locations can be confusing and time consuming for network providers. We support section 2.1.5 on developers engaging with mobile operators to assess future demand from proposed developments which should become common practice. This also supports earlier comments at section 1.3.3.
11. Whilst we welcome section 2.3.1 which encourages applicants to thoroughly assess impact on existing development as well as the existing public realm and pavement access requirements, we suggest that the guidance should encourage and enable LPA's and Highways Teams to engage with network providers on these issues early in the planning process.

## **EXISTING CONNECTIVITY CAPACITY AND DATA**

12. Section 3.1.2 and 3.1.4(b) refers to the need for LPAs to understand boroughs' existing mobile connectivity, capacities and other digital physical infrastructure provision and identify any gaps or shortfall in provision. A challenge here is that there is currently a disparity in data available between boroughs. Some boroughs own high quality data sources on coverage and capacity and others own fewer readily available sources. This requirement could be better leveraged at

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<sup>1</sup> National Underground Asset Register, <https://www.gov.uk/guidance/national-underground-asset-register-nuar>

a London level by the GLA as economies of scale can be achieved when procuring this data from private data providers like Ookla<sup>2</sup>, in a similar way to how high streets data is procured.

13. We believe that 3.2.1's requirement for LPAs to understand existing connectivity capacity and address shortfalls should be the responsibility of local authorities at the corporate level and not just with LPAs within local authorities, given the importance to placemaking, productivity and local growth.
14. We welcome section 3.2.3's guidance on understanding scale of growth and future demand related to development growth; good policy here will help drive a coordinated approach between developers and network providers.

## **OPEN ROAMING**

15. Section 3.3.4 refers to the importance of Wi-Fi and mobile data access to town centres and high street footfall. BusinessLDN's recently published Place Commission report recommended that the GLA should convene network operators to get them to work together to pool resources for 'open roaming' – where a mobile device automatically finds and connects to trusted Wi-Fi networks. This would create a better digital user experience across the capital, delivering a range of benefits to businesses and people. For example, upon arriving to London, whether by plane or train, then travelling into central London to shop in the West End, visitors should have constant uninterrupted connectivity.
16. The GLA could also explore how to mandate standards for public Wi-Fi and seamless roaming in line with Westminster City Council's Fairer Economy Plan, which sets out the borough's ambition to promote free, interoperable WiFi in central London by extending OpenRoaming beyond Westminster's street market areas to other public networks and ensuring public Wi-Fi conforms to the OpenRoaming standard. We welcome the GLA's recently announced consultation on the creation of a single open access Wi-Fi network for London but would caution against an overemphasis on Wi-Fi based solutions above and beyond 5G networks which will also be required.
17. We would also encourage the Mayor and GLA Teams to engage with fixed network providers as part of its scoping plans for the network. For example, BusinessLDN member Vorboss is investing over £250 million to build London's only full-coverage fibre network dedicated to businesses; any new city-wide WiFi based solution would interact with, and in many ways be dependent upon, a fully functioning fixed infrastructure network. The proposed solution would also need to be designed in such a way as to avoid crowding out the existing investment that network operators are already delivering within company business plans.

## **DIGITAL CHAMPIONS**

18. Currently, some boroughs have a Digital Champion, responsible for the development and delivery of a local digital strategy and for advocating for digital infrastructure investment. The GLA should encourage all boroughs to employ Digital Champions, and for their work to

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<sup>2</sup> Ookla.com

support a coordinated London-wide plan to the way digital infrastructure in London is delivered.

19. We welcome section 3.3.3's call for the adoption of a digital inclusion strategy for LPAs but believe this should sit at the corporate level of a local authority rather than purely with the LPA team. This could also form part of the remit and responsibility of Digital Champions.

### **IN-BUILDING COVERAGE**

20. The guidance is relatively light on in-building coverage. For development of a significant size, the guidance could set out requirements for how developers provide in-building coverage via solutions like Neutral Host In-Building or Distributed Antenna Solutions to ensure effective mobile coverage when inside a building.
21. For further information about this response, please contact John Kavanagh, Programme Director for Infrastructure: [john.kavanagh@businessldn.co.uk](mailto:john.kavanagh@businessldn.co.uk)