

Digital Connectivity Infrastructure London Plan Guidance

Consultation Summary Report

October 2024

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Greater London Authority

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For more information about this document, please contact:

The London Plan Team, GLA Planning

Greater London Authority

City Hall

Kamal Chunchie Way

London E16 1ZE

www.london.gov.uk

Tel 020 7983 4000

Email: londonplan@london.gov.uk

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1 Introduction

Between 19 October 2023 and 11 January 2024, the Greater London Authority (GLA) carried out a formal consultation on the Mayor's draft Digital Connectivity Infrastructure London Plan Guidance (DCI LPG).

This report summarises the survey responses received during the consultation period. These responses came from an online survey; submitted emails; and stakeholder event comments and questions. Three online events were held through the consultation period, for Londoners to learn more about the draft DCI LPG and ask questions. Appendices 1 and 2 break down all the consultation and engagement activity held since the draft LPG was published.

The report identifies the key issues raised in the draft LPG consultation; and sets out the GLA's response. This response has been informed, in part, by follow-up conversations with stakeholders, including the digital industry and local planning authorities (LPAs). The Mayor would like to thank everyone who took part and engaged with the guidance.

2 Who took part?

During the consultation period there were 40 attendees at the virtual events; 675 visits to the consultation platform; and 232 document downloads. Of the 13 questionnaire responses received, nine were sent through the dedicated online survey. Of these, one was sent via both the online survey and email. The remaining four were sent directly by email, rather than the engagement platform.

Respondents were asked what type of organisation they represent, or whether they were responding as an individual. A list of the organisations that responded to the formal consultation can be found in Appendix 1.

Respondent type	Number	Percentage
Individual	2	15%
Business	1	8%
Campaign group	1	8%
Community group	1	8%
Government body or agency	1	8%
Local authority outside London	0	0%
London borough	5	38%
Professional body	2	15%
Total	13	100%

Representations were received from three organisations focused on groups with protected characteristics: London Gypsies and Travellers; the Equality and Human Rights Network; and the London Digital Inclusion Network.

This LPG draft was informed by early informal engagement (in January/February 2023) with key stakeholders to scope the key issues. Insight and evidence were gained from over 50 interviews with a broad range of stakeholders, including LPAs; mobile and broadband operators; developers; and others. Following on from this, the formal engagement with key stakeholders took place between October 2023 and January 2024. These have collectively helped shape the iteration of the draft DCI LPG. We would like to thank everyone who took the time to contribute.

3 Respondent demographics

Respondents were asked for equality-monitoring information to assess how they compared to the demographics of Londoners. We received limited responses to these questions; therefore, the relevant analysis has not been included in this report. Other engagement was undertaken prior to the formal consultation, including technical meetings with consultants, borough officers and industry representatives. Equality-monitoring information was not collected for these engagements.

4 Consultation feedback and GLA response

4.1 Summary of DCI LPG consultation responses

As part of the consultation on the draft guidance, respondents were asked to submit answers to a survey (combining specific and more open questions) through the GLA's online consultation portal. There were 47 questions, of which 18 were closed-ended tick-box style and 29 were open-ended comment style (see Appendix 3). As the main purpose of the report is to highlight the key qualitative issues raised, the analysis focuses more on responses to the open-ended questions. Tables showing responses to the closed-ended questions are included where they can supplement or contrast with the issues being discussed in the relevant section. Some respondents chose to submit email responses – not all of which used the survey questions as headings. Therefore, this section is organised by issue, mirroring the structure of the draft LPG. Where relevant, we indicate the support for a position where this was discernible through a specific question.

Responses on the scope – how the LPG will be applied

This section summarises all the feedback relating to the scope of the LPG, covered by questions 1 to 7.

Question 1: Is there any other type of development that has not been listed here to which this guidance is applicable?

Response	Number	Percentage
Yes	1	13%
No	6	75%
Don't know	1	13%
Total	8	100%

Most respondents to this question were satisfied with the types of developments the LPG will apply to.

Question 3: Building Regulations (part R) have now covered fully the requirements set out in London Plan policy SI 6 A(1) and therefore its requirements are not covered again in this guidance. Do you agree with this position?

Response	Number	Percentage
Yes	7	88%
No	1	13%
Don't know	0	0%
Total	8	100%

Most respondents to this question agreed that that Building Regulations (part R) fully cover the requirements set out in London Plan policy SI 6 A (1), and therefore saw no need to cover this again in the LPG.

Question 5: Do you agree this guidance should also apply to digital infrastructure development prior approval notifications?

All nine respondents to this question agreed that the LPG should be applicable to DCI prior approval notifications.

Key matters raised in relation to the scope of the LPG – comments merged for open-ended questions 2, 4, 6 and 7:

- The guidance should apply to all non-major applications and all DCI/non-DCI prior approval applications.
- The guidance should apply to all development proposals.
- Planning policy and guidance should avoid repeating Building Regulations, as this creates an overdetailed and complex framework.
- The reference to ‘masts, antennae or other apparatus that are not permitted development will require prior approval notifications’ is incorrect and should be deleted.
- Reference to all stand-alone DCI is not clear, and is not recognised by the industry. It should be amended. Additional points were made suggesting revising and clarifying definitions and terminology.

GLA response:

- We reviewed evidence on the potential application of this LPG to different types of planning application. However, we considered that a blanket application to all planning application types, and to all non-DCI prior approvals, would not have a meaningful impact. The LPG seeks to strike a balance; and gives LPAs the discretion to set their own thresholds for when the LPG should apply if deemed necessary.
- New Building Regulations (Part R) emerged in December 2022 (after the current London Plan was adopted in 2021). These overlapped with elements that were covered in London Plan policy SI 6 A (1). Thus, it was considered appropriate for the LPG to avoid duplicating this.
- The current wording has been reviewed, and some minor changes made to clarify the types of development to which the LPG would apply (as noted in page 1 of the DCI LPG). The requirements of SI 6 A part 4 (set out in Section 2 of the guidance) will remain only applicable and relevant to DCI prior approvals under Part 16 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any other such future Order).
- For clarity, all reference to stand-alone DCI has been replaced with ‘individual DCI’. Additional points suggesting clarified definitions and terminology resulted in some minor wording amendments to the footnotes and glossary.

Responses for Section 1 – Supporting information required with planning application submission

This section summarises all the feedback on questions 8 to 12, relating to the supporting information required with planning applications.

Question 8: Do you agree with the suggested supporting information for planning applications?

Response	Number	Percentage
Yes	3	33%
No	4	44%
Don't know	2	22%
Total	9	100%

The responses suggest neither strong support for, nor opposition to, the information requirements set out in Section 1 of the LPG. However, related comments are summarised below.

Key matters raised – comments merged for open-ended questions 9, 11 and 12:

- There was support for the requirement for an **evidence checklist** with the planning application submission. This could be useful in supporting consistency for all key stakeholders.
- It was suggested that requiring the submission of **visuals and photomontages** with planning applications could provide a better understanding of the impact of DCI development proposals.
- There was support for **proactive engagement** with local communities and, specifically, digital inclusion groups and forums.
- There was concern raised over the requirement for applicants of major developments to consult all mobile operators that have **mast sites within 250m** of a proposal. It was suggested that it should be better dealt with via planning condition.
- There was a recommendation that **WiredScore**¹ should only be needed where it is highlighted at the pre-application stage.

¹ WiredScore standard assesses and certifies digital connectivity and smart technologies to help improve connectivity and user experiences in buildings

- It was suggested that developments should have to show that the DCI is capable of provide service to at least 'good' or 'fair' standards, using the Reference Signal Received Power (RSRP), Reference Signal Received Quality (RSRQ) and Signal to Noise Ratio (SINR) signal-strength measures.²
- There was a suggestion the **LPG should avoid duplication** with other existing regulations, policy or standards. These include the National Policy Planning Framework, Code for Wireless Network development, and Construction Design and Management regulations.
- There was a suggestion to encourage **DCI on less prominent sites** by prioritising areas such as car parks and business parks over residential sites.

GLA responses:

- It is important to clarify that not all the information requirements listed in Section 1 will be required with every application; a checklist could be misleading in this way. Sections 1.3 and 1.4 could, however, still serve as a useful list of prompts for applicants. To avoid being overly prescriptive, no further checklists are offered here. We also note that 'The Code for Wireless Network development in England'³ guidance document covers DCI requirements in greater depth. This LPG has only sought to signpost other regulations and industry standards where appropriate; but we acknowledge that, as a result, there are some overlaps in the coverage of themes. In addition, Annex B of 'The Code for Wireless Network development'⁴ provides a DCI-specific supplementary information template that could serve as an appropriate complementary checklist.
- The submission of visuals and photomontages has been added to Section 1, acknowledging this is an existing best practice demonstrated in some planning applications and/or accompanying planning statements.
- The importance of community engagement is already acknowledged in Section 1. However, wording has been added to state that, where community consultation is not possible, it will be the responsibility of developers and/or applicants to provide a written justification. They will be responsible for contacting appropriate network providers and local authorities for site selection and differing types of DCI installations locally.
- The 250m rule was suggested as a minimum radius distance for best practice, to support a more comprehensive consultation process to identify any potential connectivity issues and/or gaps nearby. Section 3 outlines approaches that could help developers identify site locations. The wording has not changed, and

² RSRP is used as a vital measure in cellular networks for coverage; RSRQ is used for capacity; and SINR is used for interference.

³ [The Code for Wireless Network development in England](#)

⁴ [The Code for Wireless Network development in England](#)

acknowledges that LPAs can and already do use planning conditions at their discretion, where needed.

- It will be at the discretion of developers and applicants to put forward WiredScore or any other equivalent standards, and any accompanying supporting statements explaining how they meet connectivity requirements. These can be submitted as part of the information requirements supplementing their application at any stage in the process.
- Wording has been added in Section 1.4, in response to the recommendation that developments evidence that the proposed DCI can achieve at least ‘good’ or ‘fair’ standards using Ofcom’s signal-strength measure RSRP.⁵ Whilst RSRP is referenced in the LPG, it is acknowledged that other measures for signal strength can be used.
- The aim of the LPG is only to supplement existing London Plan policy SI 6; and fill any knowledge gaps relating to the application of this policy. This LPG has only sought to signpost other regulations and industry standards where appropriate; but we acknowledge that, as a result, there are some overlaps in the coverage of themes.
- The LPG seeks to strike a balance, and gives LPAs the discretion to set their own land-use priorities in different locations based on their local contexts and needs. Therefore, it would not be appropriate for the LPG to require that preference is given to less prominent sites, by prioritising car parks and business parks over residential sites. The emphasis of Section 2 of the LPG is to encourage careful siting of DCI on all public-realm sites, regardless of their ownership, economic value or geographical position.

Question 10: Are there likely to be any unintended consequences of any aspects of the guidance set out in Section 1?

Many respondents (six out of eight total respondents) agreed that unintended consequences would likely arise from this guidance.

Key matters raised for perceived unintended consequences of Section 1 – comments merged for open-ended questions 11 and 12:

- There was concern that **inadequate community engagement could lead to objections** to development proposals.
- Greater use of rooftops and public spaces could lead to **negative design outcomes**.

⁵ RSRP is used as a vital measure in cellular networks for coverage. [OFCOM has set out](#) what it views as ‘good’ (100dBm) and ‘fair’ (110dBm) values in its method for the UK. This will be particularly relevant when reporting on mobile 5G availability predictions.

- There was concern that the level of information required in Section 1.4 could potentially cause **delays to the planning process**. Concern was also raised that the information requirements for DCI-related applications are too complex; and could lead to **disputes at the validation stage with major planning applications**.
- A concern was raised that requirements for transport and heritage assessments could lead to LPAs requiring these documents when they may not need to, leading to **unnecessary costs**.

GLA responses:

- Section 1.4 highlights the importance of early community engagement, ideally from pre-application stages onwards. The requirement to demonstrate evidence of community engagement and justifications for where that may not be possible could help foster greater community buy-in and counter objections.
- The LPG seeks to promote better design and optimise rooftops and public spaces. Its approach in highlighting the importance of early engagement between stakeholders, could help counter any negative impacts by ensuring both applicant and LPA work together as soon as possible.
- The approach set out in Section 1.4 is intended to aid the applicants in carefully selecting and submitting all the appropriate and necessary details to the LPA, enabling effective decision-making. It does not state that every application must include all the different information requirements; this will depend on the type of application being submitted, and would not preclude applicants checking with LPAs for any other local validation requirements.
- The wording in relation to transport and heritage assessments has been reviewed for clarity, but no further changes have been made.

Responses for Section 2 – Better design for DCI delivery

This section summarises all the feedback on questions 13 to 32 relating to better design for DCI delivery.

Question 13: Do you agree that building level mobile connectivity should be available throughout the development to meet the expected demand of all its end users?

Response	Number	Percentage
Yes	7	78%
No	0	0%
Don't know	2	22%
Total	9	100%

Most respondents agreed that building-level mobile connectivity should be available throughout the development to meet the expected demand of all its end users.

Key matters raised on achieving appropriate mobile connectivity – comments merged for open-ended questions 14 and 15:

- There was concern that not enough guidance was provided in the draft LPG on **how to avoid reducing mobile connectivity** for neighbouring buildings, because of an improvement in connectivity in one building.
- Linked to the above point, there was a suggestion that the LPG should highlight the importance of ensuring **in-building coverage** and connectivity – using solutions such as distributed antenna solutions (DAS) and/or other mobile signal boosters to extend in-building coverage and external connectivity from one building to the next.

GLA response:

One of the LPG's central purposes is to ensure that development proposals should seek to meet the expected demand for mobile connectivity, and to avoid worsening mobile connectivity; and mitigate any adverse impacts. Section 2.1.4 highlights the need to ensure building-level solutions, enabling adequate mobile coverage, are provided to meet expected end-user demands with any given development proposal. DAS has been referenced as one currently available solution, though it is acknowledged that other technological solutions can also be used.

Question 16: Do you agree that the guidance set out for digital infrastructure on rooftop sites will support opportunities to improve mobile connectivity of an identified area?

There was no strong agreement nor disagreement with the guidance set out for DCI provision on rooftops (as set out in Section 2.4 of LPG).

Key matters raised on DCI on rooftop sites – comments merged for open-ended question 17 and 21:

- There was a recommendation suggesting a need to ensure that **rooftop siting was not intrusive** and should meet safety requirements. Suggestions were made around the importance of mitigating the visual impact via less prominent siting; and the incorporation of equipment camouflage or screening, where feasible.
- There was a suggestion that London Plan Policy D9 on tall buildings, and the LPG, need to make it clear that any **rooftop infrastructure** should not form part of a structure's **maximum calculated storey heights**.
- There was concern that the LPG does not address understanding and mitigating the **impact of development on existing mobile DCI sites**, where they are on a building subject to redevelopment or extension.
- There was a supportive comment highlighting the importance of ensuring that all DCI applications are **future-proofed**, although it was accepted that this may not always be possible due to space constraints in some sites.

GLA responses:

- Wording has been changed throughout Section 2.4 to emphasise careful design and rooftop siting.
- It is not within the scope of the LPG to change London Plan policy D9 on tall buildings. Each borough is responsible for defining what constitutes a tall building in their area, and whether or not it includes rooftop infrastructure. However, Section 2.2 seeks to encourage development proposals to optimise the use of rooftops to accommodate better-designed, better-located mobile DCI.
- The LPG will apply to both new-builds and existing buildings in development proposals. Without being too prescriptive, applicants will need to demonstrate, with the appropriate information, that their proposals meet the expected demand for mobile connectivity for end users, whilst indicating that the proposal will not impact connectivity levels for any existing neighbours/users.
- Section 2 seeks to ensure that relevant DCI applications endeavour to future-proof (e.g., through access or space provision for future upgrades). However, it is acknowledged that this will not always be possible due to space constraints.

There was a very low response rate (seven or fewer respondents answered) for these four closed-ended questions:

- Question 20: Do you agree with the guidance set out in Table 1?
- Question 22: Do you agree with the guidance set out in Table 2?
- Question 24: Do you agree with the guidance set out for ground-based masts?
- Question 26: Do you agree with the guidance set out for equipment cabinets?

The results therefore showed no clear support for, nor opposition to, the guidance on these points set out in Section 2 of the LPG. Any associated comments and concerns raised for these questions have been captured in their interrelated question responses,⁶ as discussed below.

Question 18: Do you agree that the guidance set out for provision of digital infrastructure in the public realm will help provide increased opportunities to improved mobile connectivity?

Most respondents agreed with the guidance set out for DCI provision in the public realm (as set out in Section 2.5 of the LPG).

Key matters raised on DCI in the public realm – comments merged for open-ended questions 19, 21, 23, 25 and 27:

- There was a comment suggesting that DCI provision in the public realm is often difficult for developers and/or providers due to **inconsistencies across London regarding the deployment** of mobile DCI. For example, small-cell deployment on lampposts or CCTV columns can be delayed or impacted due to lighting column manager restrictions, in LPAs where they may have de-cluttering initiatives in place. DCI delivery is **more effective when local authorities work together** in a joined-up manner.
- There was a suggestion that **Wi-Fi and its equivalent be freely available** in all shopping centres and/or public spaces.
- There was a suggestion that, where possible, LPAs and developers should **move away from using telephone poles**, and towards burying cable within ducts.

GLA responses:

- Section 3 encourages LPAs to think more holistically about how they can improve their practices for supporting DCI delivery by taking more of a joint approach; but appropriately addressing any local challenges remains the boroughs' responsibility.
- The importance of improving connectivity in public spaces and shopping centres is already encouraged in Section 3.3; and is increasingly provided by many boroughs.
- The suggested wording – 'where possible to move away from using telephone poles, and towards burying cable within ducts' – has been added in Section 2.3.

⁶ See key matters raised for questions 19, 21, 23, 25 and 27.

Question 30: Is there any guidance suggested in Section 2 likely to have any unintended consequences?

There was no strong agreement nor disagreement expressed on the likely unintended consequences of Section 2 of the LPG.

Key matters raised on likely unintended consequences and other comments on Section 2 of the LPG – comments merged for open-ended questions 28, 29, 31 and 32:

- A comment acknowledged there was **complexity in addressing planning and non-planning issues** (such as meeting health and safety, building standards, and legal requirements for all parties), that will need to be adhered to when siting a mast and other equipment.
- A comment highlighted the need for **better management of notices to quit** (NTQs). This poses challenges when submitting a new development application can give rise to an existing DCI installation being subjected to an NTQ. This can often result in a loss of coverage or capacity for existing users, unless a replacement site can be found quickly.
- There was a suggestion that there should be a requirement in the LPG for all **buildings over a certain height**, e.g., 18m, to include suitable space for mobile DCI infrastructure. This should be regardless of application type and whether the proposed development was major or non-major.
- There was a suggestion that older, obsolete mobile-mast and other infrastructure should be removed expediently. Additionally, it was suggested that the GLA should consider **recycling and reusing defunct telecommunications equipment** and cabling, such as copper cabling, telephone handsets and others.

GLA responses:

- The LPG guidance will be a material planning consideration in all planning decision-making. It will therefore provide the necessary leverage to ensure DCI is adequately provided in all relevant planning applications.
- The need to address any cumulative impact of NTQs has been added in Section 3.3. However, it will remain each LPA's responsibility to carefully address them, taking account of local circumstances and where it may be contributing to gaps in connectivity.
- The LPG seeks to ensure that all relevant planning applications provide adequate DCI and optimise rooftops and public realm where possible. The suggestion to mandate that all buildings over a certain height (18m or over) to provide suitable space for mobile DCI infrastructure is considered a new policy suggestion. However, it is not within the scope of the LPG to create new policy.

- Information around the removal of obsolete and unused DCI equipment has been added into Section 3.3.6. However, it will remain each LPA's responsibility to carefully address the recycling and reusing of defunct telecommunications equipment working with the DCI equipment owners.

Responses for Section 3 – Local plan-making and wider council approaches

This section summarises all the feedback on questions 33 to 41 relating to local plan-making and wider council approaches.

Question 33: Do you agree with the guidance set out for how Local Plan-making processes could support digital infrastructure delivery?

Response	Number	Percentage
Yes	8	80%
No	2	20%
Don't know	0	0%
Total	10	100%

Most respondents agreed with the guidance for how Local Plan-making processes could better support digital infrastructure delivery.

Key matters raised on the guidance set out for how Local Plan-making processes could support digital infrastructure delivery in question 34:

- There was a suggestion for a comprehensive DCI strategy that could be linked to a local authority's **Infrastructure Development Plan**, which could help in identifying individual borough capacity.
- There was a suggestion LPAs should **engage with telecommunications** operators directly. This would enable infrastructure providers to understand the anticipated scale of housing and population growth; and the potential demand from future proposed developments as part of the planning policy process.

GLA responses:

- Sections 3.1 and 3.2 already state the importance of LPAs taking the initiative, and joining up with wider council policies and any relevant strategies when developing local planning policies. Nonetheless, taking account of such strategies has been signposted in Section 3.
- Sections 3.1 and 3.2 encourage boroughs to act more strategically by engaging telecommunications operators to understand the local DCI needs for their areas when developing a Local Plan, and not through individual planning applications.

The LPG encourages LPAs and developers to cooperate and share such information where possible.

Question 35: Do you agree with the guidance set out for how the site allocation process can support digital infrastructure locally?

Question 37: Do you agree with the guidance set out for how wider council level initiatives could join-up to support DCI provision locally?

In relation to these two questions, most respondents agreed with the guidance on how the site allocation process, and wider council-level initiatives, can support digital infrastructure locally.

Key matters raised on the guidance set out for how the site allocation process can support digital infrastructure locally for question 36:

- There was a suggestion that a **standard approach/methodology** is put forward, that could help identify suitable sites and better use the assets that are already in-situ.
- There was a suggestion that the approach to the call for sites is not realistic because the **timescales** would not be practicable for the industry to meet.
- There was a suggestion that use of any given site should be **prioritised for residential development** over a site allocated for free-standing DCI; and that any provision of DCI within a site allocation should not prejudice the delivery of homes.

GLA responses:

- A 'call for sites' for the land-use site allocations is a tried-and-tested approach used by LPAs. The LPG is encouraging the use of this existing method to identify DCI sites where the LPA identifies a need and/or wants to optimise an existing site.
- The use of the call for sites would not necessarily jeopardise or undermine housing delivery, as DCI provision would need to be part of most housing or non-housing development proposals. An undertaking of a call for sites could serve more than one purpose for the LPA.

Key matters raised on how wider council level initiatives could join up support – comments merged for open-ended questions 38, 39, 40 and 41:

- There was a suggestion that one challenge to the delivery of DCI at local level has been the very **low rate of approvals for prior-approval** applications for street works.

- There was a suggestion that **boroughs could commission surveys** to understand broadband not-spots; enable better data collection; and factor in demographic changes in the area, to tailor the engagement.
- It was suggested that the LPG could require boroughs to appoint **Digital Champions**.
- There was a suggestion the guidance should seek to guide councils to **join up DCI** in the same way **as other essential services**, such as gas, electricity, lighting, etc.; and that this is treated with the same importance as the wording used in para 9.6.1 of the London Plan.

GLA responses:

- The guidance in Section 2 may help better support greater approval levels for all types of DCI proposals, including prior approvals; as street works are a highway issue, it is outside of the scope of the LPG. LPAs are responsible for managing street work masts and other DCI siting in highways.
- The LPG places responsibility on boroughs to act strategically in addressing any gaps in understanding their local area's digital needs. They would be responsible for commissioning borough surveys to better understand broadband not-spots and other local needs; this has been suggested in Section 3 more generally.
- It is not considered to be within the LPG's scope to make such requirements of LPAs. However, as best practice, boroughs can (if they choose) have a designated point of contact in the LPA for DCI matters.
- Where possible, councils should join up DCI with other essential utility services delivery. Highlighting their importance to LPAs is a central goal of the LPG.

General questions

Question 42: Do you agree that the content covered by this LPG will help improve digital connectivity infrastructure delivery?

Most respondents agreed that the content covered by this LPG will help improve DCI delivery.

The key matters raised – comments merged for open-ended questions 43 and 44:

- There was concern raised that the LPG repeats London Plan policies, and is therefore not needed.
- There was also concern that the LPG may create additional burden in an already-heavy policy landscape, alongside the requirements of the London Plan and related supplementary guidance.

GLA response:

The LPG is intended to aid decision-making and help deliver London Plan policy SI 6 more effectively and consistently across boroughs. Furthermore, whilst there are some overlaps with themes covered in the existing policy landscape, it does so to the extent that it supplements and/or signposts, rather than duplicating their content.

5 Other themes raised during the consultation

There were various comments submitted that sit outside of the scope of the DCI LPG and London Plan policy SI 6. It was not therefore possible to include these in the revised LPG proposed for adoption. These include comments related to joint working between the GLA and key stakeholders; additional technical detail relating to demonstrating suggested standards; and further suggestions for LPA actions. These will be discussed as appropriate within the GLA and through ongoing liaison with stakeholders (e.g., via the Association of London Borough Planning Officers) to see if there are further revisions to current practice that may be warranted. Some suggestions will also be relevant to the wider review of the London Plan.

6 Equality impacts

The following general equalities impacts issues raised – comments merged for open-ended questions 45-47:

- It was asked whether the LPG will be available in different languages.
- There was a supportive comment suggesting that the LPG is likely to help people with protected characteristics. There was a comment highlighting the importance of service operators to engage with older and/or lower-income households and social tenants, in a timely and targeted way, to ensure they can have appropriate connectivity.

GLA responses:

- The GLA has policies in place to help provide documents in an accessible format, and if a particular language is requested.
- As noted in the EqIA, the LPG is intended to benefit all Londoners, and not exclusively those with protected characteristics.
- There are currently well-established statutory planning duties require all residents within an affected development to be consulted when there is a planning application. Section 3 emphasises the role of LPAs to work with the wider council services and industry operators to address any gaps in connectivity and to meet local needs, which would help them identify whether more targeted action for specific digitally excluded households is needed.

The key matters raised by London Gypsies and Travellers Group:

- There was a comment highlighting the importance of mobile data because a high proportion of families and individuals live in temporary accommodation. It is therefore important to ensure that all types of accommodation (including temporary) have appropriate DCI provided, with affordable connectivity.
- There was a suggestion that London Plan Policy H14: Gypsy & Traveller accommodation requires LPAs to consider DCI provision and any issues as part of the audit requirements; and then to address them in line with clause D and E of the policy.
- There was a suggestion that the GLA Affordable Homes Programme provides funding to local authorities to refurbish existing Traveller sites, and to build new ones; and to use this opportunity to encourage providers to consider the needs for improved digital infrastructure on Traveller sites.

GLA responses to London Gypsy and Travellers Group comments:

- The guidance has been amended in Section 3.4 to capture the point that all Gypsy and Traveller sites, and any temporary accommodation, should be provided with adequate and affordable DCI where possible.
- In the opening section of the LPG, wording has been added to state that the LPG will apply when implementing the audit requirements set out in London Plan Policy H14 D and E for Gypsy and Traveller accommodation in LPA-owned sites. Additionally, in Section 3.4, further cross-referencing has been made to Policy H14, clause D and E – this sets out a specific requirement that LPAs in LPA-owned sites undertake audits that could now include whether adequate DCI is being provided.
- It is not within the scope of the LPG to influence the GLA Affordable Homes Programme. However, any housing development requiring planning permission will need to take account of London Plan policy SI 6 and the DCI LPG, once adopted.

The EqIA has been reviewed and updated further to reflect post-consultation comments as above.

7 Next steps and monitoring

All views that were shared during the formal and informal engagements have been considered in the development of the final draft DCI guidance, and the key points are detailed in this report.

There has been some post-consultation follow-up engagement, which has included some operators, LPAs and the GLA's own planning and design officers. This has supported the refinement of the document to best support policy objectives and

appropriately address concerns. Where concerns and ideas raised could not be addressed in the draft LPG, these will be considered as part of the wider London Plan review, and ongoing work by the GLA and bodies it works with on digital inclusion. Consideration was given to whether further consultation on a revised draft would add value to the guidance. However, given that there has been ongoing extensive engagement with the key interested parties following the informal early engagement and post-formal consultation, it was felt that this would not add value, having regard to the use of resources and stakeholder time.

Monitoring of the policy will be set up in line with the wider London Plan monitoring framework, and the review of planning applications and decisions related to this type of development. Ongoing engagement with stakeholders is another important aspect of monitoring. Together these can inform review of the policy and supporting guidance over time. This will be particularly important to help monitor equalities impacts, and ensure objectives are being met.

Appendix 1 Consultation respondents

- London Borough of Tower Hamlets
- Port of London Authority
- London Borough of Redbridge
- Be First Ltd (London Borough of Barking and Dagenham)
- Individual (anonymous) x 2
- Mobile UK
- Boldyn Networks
- Wandsworth Borough Council
- Southwark Council
- London Gypsies & Travellers
- Business London
- Thames Estuary Growth Board

Appendix 2 Other engagement

Key consultation events:

Date	Type of event	Where	Participants/attendees
19 November 2023	West London Alliance 5G Steering Group	online	14
7 November 2023	Webinar	online	12
27 November 2023	Webinar	online	6
13 December 2023	Community and voluntary sector drop-in event	Drop-in/ phone call	4

Other promotional and engagement activities:

When	Who	Awareness-raising and promotional activities
23 and 28 November 2023	London Digital Inclusion Network	Awareness-raising via monthly newsletter
November/ December 2023	Basecamp	Raise awareness of consultation via digital inclusion community on Basecamp
23 November 2023	Good Things Foundation	Awareness-raising via newsletter targets: members of the National Digital Inclusion Network
November/ December 2023	Superhighways	Awareness-raising via online community
14 December 2023	HEAR	Awareness-raising via gatekeeper
11 December 2023	London Gypsy and Traveller Community groups	Awareness-raising via emails, London Gypsies & Travellers, Public Affairs, Friends, Families and Travellers, travellermovement.org.uk , southwarktravellersaction.org.uk , Roma Organisation for Training and Advocacy

When	Who	Awareness-raising and promotional activities
6 December 2023	Just Space Network	Awareness-raising via London-wide network of voluntary and community groups, working together to influence planning policy at the regional, borough and neighbourhood levels
1 May 2024	ALBPO (Association of London Borough Planning Officers) meeting	Awareness-raising via presentation – London LPAs targeted (September 2023 and November 2023 meetings for promotion)
8 December 2023	Inclusive design network	Borough and community-sector organisations
December 2023	Mayor of London Communities	December 2023 Mayor of London Communities Newsletter
November/ December 2023	GLA networks to external groups targeted via emails	Awareness-raising via gatekeepers such as Disability Network; Wellbeing Network; MOPAC; BAME Workshop; GLA Women's Network; Carers and Parents Network; Homes for Londoners: Affordable Homes Programme; TfL – Independent Disability Advisory Group (email); Mayor's Equality, Diversity and Inclusion advisory group; Mayor's Commission for Diversity in the Public Realm; London Equality Network (pan-London local authority equality officers/leads); Connected London Team digital industry stakeholder groups; community and voluntary services networks

Appendix 3 Survey questions

Below are the questions asked in the LPG survey. There were 47 questions, of which 18 were closed-ended tick-box style and 29 were open-ended comment style.

Section 0 – Page 1

Questions: Type of development the LPG is applicable to

1. Is there any other type of development that has not been listed here (in page 1) to which this guidance is applicable?
2. If you answered yes to question 1, please explain what you think should be revised or added.
3. Building Regulations (part R) have now covered fully the requirements set out in London Plan policy SI 6 A(1) and therefore its requirements are not covered again in this guidance. Do you agree with this position?
4. If you have answered no to question 3, please explain and provide any additional suggestions?
5. Do you agree this guidance should also apply to digital infrastructure development prior approval notifications?
6. If you have answered no to question 5, please explain and give your reasoning
7. Do you have any other comments on this preliminary section (page 1)? please be as specific as possible and give your reasoning

Section 1 – Supporting information required with planning application submissions (pages 4-5)

8. Do you agree with the suggested supporting information for planning applications?
9. If you have answered no to question 8, please explain and give any additional suggestions?
10. Are there likely to be any unintended consequences of any aspects of the guidance set out in Section 1?
11. If you have answered yes to question 10, please explain
12. Do you have any other comments on Section 1, please be as specific as possible and give any additional suggestions?

Section 2 – Better Design for DCI Delivery

13. Do you agree that building level mobile connectivity should be available throughout the development to meet the expected demand of all its end users?
14. If you have answered no to question 13, please explain and give any additional suggestions?
15. Do you have any additional suggestions for how to avoid reducing mobile connectivity for neighbouring buildings because of an improvement in connectivity in one building? Please explain and give any additional suggestions?
16. Do you agree that the guidance set out for digital infrastructure on rooftop sites will support opportunities to improve mobile connectivity of an identified area?
17. If you have answered no to question 16, please explain and give any additional suggestions?
18. Do you agree that the guidance set out for provision of digital infrastructure in the public realm will help provide increased opportunities to improved mobile connectivity?
19. If you have answered no to question 18, please explain and give any additional suggestions?
20. Do you agree with the guidance set out in Table 1?
21. If you have answered no to question 20, please explain and give any additional suggestions?
22. Do you agree with the guidance set out in Table 2?
23. If you have answered no to question 22, please explain and give any additional suggestions?
24. Do you agree with the guidance set out for ground-based masts?
25. If you have answered no to question 24, please explain and give any additional suggestions?
26. Do you agree with the guidance set out for equipment cabinets?
27. If you have answered no to question 26, please explain and give any additional suggestions?
28. Are there any other types of digital infrastructure not identified that needs to be discussed in this section?

- 29. If you have answered yes to question 28, please explain and give any additional suggestions?
- 30. Is there any guidance suggested in Section 2 likely to have any unintended consequences?
- 31. If you have answered yes to question 30, please explain and give any additional suggestions?
- 32. Do you have any other comments on Section 2 (please be as specific as possible and suggest alternative wording where appropriate)?

Section 3: Local-Plan making processes and wider council initiatives

- 33. Do you agree with the guidance set out for how Local-Plan making processes could support digital infrastructure delivery?
- 34. If you have answered no to question 33, please explain and give any additional suggestions?
- 35. Do you agree with the guidance set out for how the site allocation process can support digital infrastructure locally?
- 36. If you have answered no to question 35, please explain and give any additional suggestions?
- 37. Do you agree with the guidance set out for how wider council level initiatives could join-up to support DCI provision locally?
- 38. If you have answered no to question 37, please explain and provide any additional suggestions?
- 39. Is there anything else Local Planning Authorities can do to better to understand and address any gaps in digital infrastructure coverage and capacity to meet user needs in their locality?
- 40. If you have answered yes to question 39, please explain and provide any additional suggestions?
- 41. Are there any other comments you wish to make on Section 3 on how Local Planning Authorities can better support DCI provision in their locality – please explain and provide any additional suggestions?

General questions

- 42. Do you agree that the content covered by this LPG will help improve digital connectivity infrastructure delivery?
- 43. If you have answered no to question 41, please explain and provide any additional suggestions?

44. Are there any other comments you wish to make on this LPG – please explain and provide any additional suggestions?

EqlA questions

45. Are you aware of any additional evidence that the GLA should use to understand any potential impacts resulting from the guidance on protected groups?
46. Are you aware of any additional impacts resulting from the draft guidance that could affect those with protected characteristics?
47. Do you have any further comments on the EqlA that accompanies the draft guidance?

