

MAYOR OF LONDON

London Plan Guidance

Digital Connectivity Infrastructure

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London Plan Policy

Policy SI 6 Digital connectivity infrastructure (DCI) - The requirements of SI 6 A (1) are now met by the Building Regulations¹ and are not covered further within this LPG.

Exemptions under the Building Regulations are sufficient exemptions to the provisions of this LPG.

Local Plan making

The requirements of SI6 6 B - Planning authorities should use this LPG as a technical and practical guide for preparing a Local Plan to support the delivery of DCI.

Planning application type and how the London Plan Guidance will be applied

The requirements of S16 A part 2 to part 4 will apply to:

- All Major development planning applications (includes new-build, changes of use and conversions)
- Non-major development planning applications if required by a Local Plan
- All stand-alone digital connectivity infrastructure installations requiring 'Full Planning Permission.'
- Exemptions apply to single household planning applications and other types of consents. See Appendix 1 for full list.

The requirements of S16 A part 4 (set out in Section 2 of this guidance) will also apply to digital infrastructure prior approvals² under Part 16 Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015.

Who is this guidance for?

This guidance to planning officers to determine planning applications and help inform the preparation of Local Plans as appropriate.

It also aims to support applicants, developers, telecommunications and network operators, community groups, local authorities and others.

1 [Gov.uk, Infrastructure for electronic communications: Approved Document R \(2022\), 4 October 2022](#). See both [Volume 1](#) and [Volume 2](#) for key building regulation requirements.

2 e.g. digital infrastructure such as radio masts, antenna or other apparatus that are not permitted development which will require prior approval notifications.

1 About this document

1.1 Purpose of the LPG

1.1.1 This Digital Connectivity Infrastructure (DCI) London Plan Guidance (LPG) is intended to provide practical guidance, from the initial pre-application and design stages and throughout the planning application process, It aims to:

- 1) clarify the key requirements for developments to provide/support DCI delivery;
- 2) avoid impacts on existing DCI, addressing impacts of stand-alone DCI;
- 3) guide plan making for DCI through Local Plans.

1.2 What is Digital Connectivity Infrastructure?

1.2.1 DCI is the physical digital infrastructure including mobile and fixed (e.g., broadband) connections to the internet and other physical equipment. Examples of these are as follows:

- 1) Fixed broadband network infrastructure includes ducting, telephone/telegraph poles, the exchange, Fibre to the Cabinet (FTTC), Fibre to the Premise/Home (FTTP/H also known as Full Fibre).
- 2) Mobile network radio-based infrastructure involves stand-alone mobile masts and antennae, of different generations (3G/4G/5G). Macro Cells provide wide-area radio coverage infrastructure for a mobile network. The antennae for macro cells are mounted on ground-based masts, rooftops, and other existing structures. Small Cells are an overarching term for low-powered radio access nodes that help provide service to both indoor and outdoor areas. Further terminology is provided in the glossary (see Appendix 2).

1.2.2 For the purposes of this LPG, the term DCI only refers to physical infrastructure such as full fibre, ducting, telecommunications masts, base stations, cabinets and associated equipment that delivers digital connections. It includes all the infrastructure defined in this section.

1.2.3 Mobile coverage is the area where a device (such as a handset) can connect to the mobile network. Capacity is the amount of traffic and users the network can handle, and the speeds at which it can deliver.

1.2.4 Digital Exclusion refers to when individuals cannot access the benefits of digital communication and the internet because they do not have the

right digital connectivity via the physical infrastructure, a suitable device, a lack skills, and/or cannot afford to pay for connectivity. This LPG seeks to support improvements in fixed and mobile infrastructure through the planning process and improve digital connectivity across London. It also seeks to support: avoiding worsening mobile connectivity; digital inclusion and improved access to services; and avoiding physical barriers that impede mobility.

1.3 Minimum requirements for improved DCI delivery

- 1.3.1 All relevant applicants should set out in their planning application how they are complying with Policy SI 6. This, includes whether the proposal is exceeding the minimum requirements of Building Regulations³ and/or justification for any exemptions.
- 1.3.2 All relevant development proposals should seek to meet the expected demand for digital connectivity for all end-users and support the effective use of rooftops and the public realm to accommodate well-designed and suitably located DCI.
- 1.3.3 All relevant applicants should show evidence of engagement with broadband and/or mobile operators and others. Applicants should also make use of the any relevant toolkits that reflect the latest design principles. This should include: confirmation that a suitable provider has offered to provide a connection to a gigabit-capable network for each dwelling/unit; and details of which technology will be used to deliver DCI in the development, e.g., full fibre, satellite, fixed wireless or other technologies.
- 1.3.4 Each local planning authority (LPA) must decide the relevant appropriate conditions either as part of the approved plans or separately, or as a legal agreement, where appropriate.

3 Infrastructure for electronic Communications: Approved Document R (2022):

[Approved Document R Volume 1](#), provides guidance on how to comply with the requirement to install gigabit-ready physical infrastructure and a connection to a gigabit-capable public electronic communications network when new dwellings or a building containing one or more dwellings when erected.

[Approved Document R Volume 2](#): provides guidance on how to comply with the requirements for in-building physical infrastructure for high-speed electronic communication networks when new buildings are erected or when existing buildings are subject to major renovation works.

1.4 Supporting information that may be needed with a planning application

1.4.1 As appropriate supporting evidence may include the following:

1.4.2 Evidence of prior consultations:

- 1) Development proposals, where relevant, should include details of: any early engagement/consultation with network providers; the outcome of consultations with organisations that have an interest in the proposed DCI development; and formal agreements regarding the installation of equipment, as well as ducting, cabling and maintenance arrangements.
- 2) Applicants should include evidence of any community engagement, including with relevant neighbourhood planning bodies, nearby schools and colleges, and other groups, where relevant.
- 3) Applicants should consult, where possible, all mobile operators with mast sites within 250 metres of a major development site, with regard to the potential impact on mobile connectivity. Applications should provide evidence of such consultation as part of the planning submission. If there are mast sites within 250 metres of a major development, applicants will also need to meet health and safety risks that have been identified in the Construction Design and Management regulation 2015, specifically schedule 3 Regulation 12(2), and meet any other standards/regulations as required.
- 4) 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.

1.4.3 **Transport assessment:** Where relevant, this should address the potential impact of DCI installation on highways and circulation. This includes the potential impact of any ground-based mast/equipment on traffic and circulation, including pedestrian flows, cycle traffic, public transport infrastructure and vehicle movement, if required.

1.4.4 **Heritage assessment:** This may be relevant for any proposed DCI installation and associated ductwork that may impact on designated or non-designated heritage assets, or their setting, as appropriate. Pre-application advice should be sought, and consideration given to both the impact on historic fabric, and the visual/other impacts on the

building's appearance and the settings of heritage assets. Further guidance is available via Historic England guidance⁴.

- 1.4.5 **Future upgrade/maintenance/access:** Where relevant, this should plan for dual entry through Communal Entry Chambers, as well as flexibility to address future technological improvements; and/or details on ducting approach for safe, timely and high-quality street works, e.g., the One-Dig approach. All new development should incorporate future-proofed DCI to accommodate utilities connection requirements; and be designed to accommodate access and safety considerations.
- 1.4.6 **Appropriate agreements:** These should be used where applicable and available to support the feasibility of the proposed development. The GLA has produced best-practice example agreements and guidance for wayleaves, mobile infrastructure, rooftop and greenfield sites (see the GLA's webpage on Connected London Resources⁵)
- 1.4.7 **Appropriate connectivity rating:** For major developments, applicants are encouraged to undertake an assessment of the connectivity levels using a certification process such as WiredScore, with a view to achieving a rating of, or equivalent to, WiredScore 3. This should demonstrate that developments can meet expected demand for mobile connectivity generated by the development for end-users.
- 1.4.8 **International Commission on Non-Ionizing Radiation Protection (ICNIRP) self-certification statement:** Applicants should self-certify that the DCI, when operational, will meet ICNIRP guidelines. These will be required where there is a new, or an addition to an existing, mast or base station.

2 Better design for DCI delivery

2.1 Mobile digital infrastructure

- 2.1.1 Development proposals should seek to meet the expected demand for mobile connectivity, avoiding worsening mobile connectivity; and mitigate any adverse impacts, where appropriate.
- 2.1.2 They are encouraged to optimise the use of rooftops and the public realm (such as street furniture and bins) to accommodate better-designed, better-located mobile DCI. Poor siting of cabinets,

4 [The Installation of Telecommunications Equipment, Including Broadband and Mobile, in Churches and Other Listed Places of Worship](#)

5 [Connected London Resources](#)

transformers, masts and other equipment in the public realm may restrict pavement width, which may then restrict public access for all at street level. This consideration of appropriate siting could benefit disabled people, including people affected by sight loss; wheelchair users; people with invisible disabilities; and older people.

- 2.1.3 As demand for digital infrastructure in a location increases (for example, as a new development is occupied) the capacity provided by a mast site gets used up. This effectively ‘shrinks’ the coverage area around the mast. In some cases, it can cause gaps in coverage between the serving mast and adjacent masts, requiring corrective action to plug the gap. Corrective action can range from adjusting the antennae of adjacent sites (thus filling these gaps) to building new sites. To meet the estimated demand from new developments, mobile operators will rely on a combination of site types and spectrum to provide coverage and capacity to meet user needs, as shown in Table 1 below.

Table 1 Site types and spectrum for mobile coverage and capacity

Types of sites	Location	Coverage
‘Macro’ sites	Rooftop or standalone tower	To provide coverage over a kilometre or so in an urban area
Monopole sites (commonly known as street works sites)	Often sited on highways land	Increasingly important in adding additional capacity to the network
‘Small cell’ sites	Lamp posts or other furniture	To provide additional capacity in high footfall – user demand areas and might cover an area no greater than 250 metres

- 2.1.4 Mobile coverage, both indoor and outdoor, can be affected by architectural design, building height and the building materials used, including insulation. For major developments, site-specific solutions should be considered at the early design and planning stages. These should take into account the impact of new development, including footprint and height, on area-wide wireless services, and network coverage and demand locally.
- 2.1.5 Developers should assess, in consultation with mobile operators, the expected demand for mobile connectivity to be generated from proposed developments. This should be assessed in the project planning and design stages for future-proofing of digital networks. It will depend on the development type, scale and major socio-economic trends (e.g., the rapid proliferation of hybrid working), which all affect the mobile connectivity demand and capacity needed.

- 2.1.6 The London Connectivity map provides estimated coverage by broadband network services.

2.2 Rooftop sites

- 2.2.1 The Code of Practice for Wireless Network Development in England⁶ sets out that mobile operators should seek to use existing buildings and structures before deploying ground-based equipment.
- 2.2.2 Rooftop installations are site-specific in nature and depend on the following technical constraints:
- Antennae should be positioned on the edge of the roof or elevated in the centre of the roof, to avoid ‘clipping’ (where the edge of the building blocks the mobile signal) and cluttering.
 - Antennae positioning should maintain sufficient ICNIRP exclusion zones, which may restrict siting locations on the rooftop.
 - Rooftop mast sites require ancillary equipment, such as equipment cabinets, and assets related to the safe operation of the rooftop space for example handrails or grills.
 - In the case of major development and/or tall buildings, consideration needs to be given in relation to any existing development with a mobile mast site, to avoid blocking mobile signals in the vicinity by casting a shadow to the surrounding areas. Developers should mitigate the impact to existing mobile network.
 - Rooftop mast sites should consider the impact of reflective building materials such as metal sheeting and steel frames; traditional thick stone walls and slate roofs; and newer glazing and materials used for insulation on wireless signal transmission.
 - The competing needs for rooftop space from other rooftop plant and infrastructure should be considered when designing rooftop installations.
- 2.2.3 The visual impact of rooftop mast sites should be minimised where possible. Mobile operators should make every effort to camouflage antennae. Measures can include coloured film wrapping or other types of screening (where suitable). Film wrapping can allow visual

⁶ [The Code of Practice for Wireless Network Development in England](#)

adaptation whilst avoiding the overheating risk associated with painting and other.

2.2.4 Best practice in ways to reduce the visual impact of the rooftop electronic communication apparatus is encouraged to be shared across LPAs and the industry. This includes use of rooftop radio-transparent glass reinforced screening (screening in front of masts) for rooftop plant room industry.

2.2.5 Consideration should be given to designing-in adequate space for DCI on the rooftops of any proposed development that may form part of the planning application or prior approval notification.

2.3 Mobile digital infrastructure in the public realm

2.3.1 Siting of mobile DCI in the public realm, including macro sites such as ground-based standalone masts, equipment cabinets and small cells on street furniture, should ensure that applicants consider and minimise impacts on the accessibility of footways and access to properties. They should ensure access for all, including wheelchair users and those with other disabilities such as visual disabilities. Development proposals should observe the following design and access principles in Table 2 below:

Table 2 – Design principles of mobile infrastructure in the public realm

Category	Design principles
Highways	Comply with visibility and line of sight requirements
Highways	Not obscure highway nameplates
Highways	Avoid obstructing existing means of access (including vehicular, cyclist and pedestrian access) and public or private rights of way.
Highways	Must avoid impeding public access, for example, by restricting pavement width, and the use of cable boxes and other equipment to ensure access for all, including wheelchair users and those with other disabilities such as visual disabilities.
Highways	Where cable protectors are used on the footway these should also have wheelchair ramps. They should be used only for the shortest possible period.
Highways	DCI intended for use by the public should be designed in an inclusive way, so that it is accessible and convenient to use by all.

Category	Design principles
Visual amenity/open space	Include design solutions to mitigate visual impact by responding to local context and character. DCI should not have a negative impact on the visual amenity of designated open spaces, where possible.
Decommissioning of digital infrastructure	Decommissioned DCI should be removed, and components reused or recycled in line with London’s circular economy aspirations and telecommunications operators’ own sustainability policies.

- 2.3.2 **Ground-based masts** - Existing ground-based masts should be utilised for network deployment wherever viable. This is to reduce the need for new development and when installing equipment, to minimise the visual impact of new development on the surrounding area as far as possible.
- 2.3.3 Where new ground-based masts are required, potential environmental and visual impacts should be reduced by siting the masts next to similar vertical infrastructure such as street lighting columns, an existing group of trees, vegetation, or other natural features.
- 2.3.4 Ground-bast mast siting should avoid impeding public access and restricting movement along highways/pavements. It should ensure access for all users, including wheelchair users and those with other disabilities such as visual disabilities.
- 2.3.5 **Equipment cabinets:** Equipment cabinets should be the smallest size possible, whilst still being sufficient to host the required operating equipment and allow air circulation to avoid overheating.
- 2.3.6 Where the site is within the setting of a heritage assets – including scheduled monuments, listed buildings, conservation areas, or registered parks and gardens – the LPA must have special regard to the impact to setting in line with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990; and chapter 16 of the National Planning Policy Framework. Further guidance is available via Historic England⁷.
- 2.3.7 Equipment cabinets should be sited to minimise impacts on the accessibility of footways and access to properties. They should avoid restricting movement along public highways/pavements by ensuring

access for all users, including wheelchair users and those with other disabilities such as visual disabilities.

- 2.3.8 When installing equipment, the visual impact of new development on the surrounding area should be minimised as far as possible.
- 2.3.9 Major commercial developments will provide a communal chamber on-site for telecommunications equipment or make appropriate provision in the vicinity.

3 Local Plan-making and wider council approaches

3.1 Local Plan-making process

- 3.1.1 Where possible, use opportunities for telecommunications operators or digital industry stakeholders to share any future plans for network expansion; and engage with the community to identify opportunities for potential mast site and other infrastructure locations.
- 3.1.2 LPAs should understand the borough's existing mobile connectivity, capacities and other digital physical infrastructure provision; and identify any gaps or shortfall in provision. For example, if an area is identified as suffering from poor digital connectivity, there should be contact with broadband and mobile providers to understand future plans for improved connectivity, or identify any barriers to to this.
- 3.1.3 Accessing Ofcom's latest connectivity coverage reports or their equivalent can be a helpful tool for understanding the connectivity in the given area. It can also help in identifying opportunities for more targeted local actions. The GLA's Connected London Map is a good resource for this work. This type of evidence could help inform the local development plan policies; any infrastructure development plan; and/or other wider council strategies, such as a digital infrastructure strategy or digital inclusion strategy, where appropriate.
- 3.1.4 Planning policies for DCI may include the following considerations:
 - a) Seek to join-up the requirements of London Plan Policy SI6 with any wider council strategies or social and economic initiatives.
 - b) Set clear and achievable gigabit broadband and mobile connectivity targets for the borough. These include spatial and capacity targets (where feasible, map borough DCI locations and/or connectivity/capacity levels)
 - c) Set out design principles considering specific local conditions, in particular the impacts on visual amenity, access, noise, and vibration of DCI installations.

- d) Mitigate environmental impacts, such as heat from telecommunications apparatus contributing to city-wide environmental issues (for example, the heat island effect).
- e) Set out clearly the responsibilities of developers and telecommunications operators to engage in pre-application and in the early design and planning stages.

3.2 Recommended best practice for site allocation

- 3.2.1 SI6 B states development plans should focus on areas with gaps in connectivity and barriers to digital access. Hence, Local Plan making processes should identify and safeguard suitable sites for DCI in major growth areas in the Borough to address any identified gaps in connectivity and coverage. This can be done by pro-actively inviting telecommunications operators to submit proposals for site allocations for DCI or requiring developers to engage with telecommunications operators on major development sites to address this requirement.
- 3.2.2 Telecommunications operators should submit potential sites for standalone telecommunications infrastructure developments – for example, macro standalone towers and ground-based masts, to be allocated in the “call for sites” exercise at the start of the plan-making process. Telecommunications operators should demonstrate that DCI installation is viable on the proposed site allocation, within a reasonable timescale. They should also demonstrate that the proposal represents optimal use of the site, whether standalone or part of a development, in accordance with Policy D3 Optimising site capacity through a design-led approach.
- 3.2.3 For large sites, local planning policies should require applicants to engage with telecommunications operators, so infrastructure providers can understand the anticipated scale of growth and the potential demand from future proposed developments. This should also include connectivity targets.

3.3 Joining up with wider council strategies

- 3.3.1 For large sites, local planning policies should require applicants to engage with telecommunications operators, so infrastructure providers can understand the anticipated scale of growth and the potential demand from future proposed developments. This should also include connectivity targets.
- 3.3.2 Improving digital connectivity is a key part of addressing digital exclusion. LPAs could consider aligning DCI policies with wider council

initiatives and resources. This can help address digital exclusion and gaps in coverage and capacity in their local areas.

- 3.3.3 LPAs should consider adopting a digital inclusion strategy. Some LPAs have adopted digital inclusion strategies, such as initiatives to install DCI in low-income housing/areas. These initiatives include the establishment of social broadband portfolios by network providers; and low-income tariffs for qualifying households to access broadband and mobile connectivity at an affordable rate. A digital inclusion or infrastructure strategy, where one is in place, could help to inform local planning policies to maximise opportunities for affordable digital connectivity.
- 3.3.4 For many councils improving digital connectivity, including Wi-Fi and mobile data access, is becoming increasingly important to businesses in town centres and high streets. Good wireless internet access for town centre visitors, whether through Wi-Fi or fast mobile connections, could encourage longer dwell time in the town centres, increasing expenditure in local shops and services. As part of Local Plan-making processes, engagement with business improvement districts and other town centre managers should be undertaken to understand current and future plans.
- 3.3.5 As technologies that improve efficiency and help reduce resource-usage continue to develop, digital policy approaches will need to consider the latest innovations to help support requirements around initiatives such as the zero-carbon targets and the Healthy Streets Approach.

4 Appendices

4.1 Appendix 1 - Summary of all the types of planning applications where exemptions may apply.

LPG Exemptions - please note this is not an exhaustive list
Householder full planning applications
Consent under a Tree Preservation Order and a Notification for Work to Trees in Conservation Areas
Advertisement Consent applications
Certificate of Lawfulness applications
Permitted Development & Prior approval ⁸ (general) - applicants should check the regulations for latest requirements ⁹
Variation of Condition (Section 73 or 73A) applications
Application for Non- Material Amendments to an Existing Permission
Listed Building Consent applications and other heritage assets ¹⁰ Further guidance can be found in: The Installation of Telecommunications Equipment, Including Broadband and Mobile, in Churches and Other Listed Places of Worship
This is not an exhaustive list. All applicants must check with the LPA to see if there are any additional regulatory and local requirements to be met outside of this LPG

⁸ Prior approval means that an applicant has to seek approval from the LPA that specified elements of the development are acceptable before work can proceed. The matters for prior approval vary depending on the type of development and these are set out in full in the relevant Parts in Schedule 2 to the General Permitted Development Order.

⁹ Gov.uk, [When is permission required?](#), published 6 March 2014, updated 26 July 2023

¹⁰ For example: Where the proposed site is a listed building, Listed Building Consent will be required for the works; Where the proposed site is a Scheduled Monument, Scheduled Monument Consent will be required for the works; Where the site is within a Conservation Area, Planning Permission may be required.

4.2 Appendix 2 – Glossary

Communal Entry Chamber

These are installed in the public highway to provide quick and easy access for telecoms services into new office developments. The chambers allow greater coordination of telecoms connections to new developments; and reduce the number of telecoms provider manholes in the street. See Infrastructure Coordination's case study on Communal Entry Chambers and early installation in the City of London.

Full fibre/Fixed broadband

Fixed broadband network infrastructure includes ducting; telephone/telegraph poles; the exchange; fibre to the cabinet (FTTC); and fibre to the premises/home (FTTP/H), also known as full Fibre.

Ground based mast

The traditional latticed mobile towers that sit in their own access-controlled compound of land. The compound will typically feature an equipment cabin to house radio equipment and termination equipment for fibre 'backhaul' links, which carry the radio traffic to and from the operator's core network where calls are connected.

ICNRP

International Commission on Non-Ionizing Radiation Protection provides scientific guidance on the health and environmental effects on humans of exposure to radio frequency electromagnetic fields associated with applications such as mobile networks and Wi-Fi.

Macro Cells

Macro cells provide wide-area radio coverage infrastructure for a mobile network. The antennae for macro cells are mounted on ground-based masts, rooftops, and other existing structures.

Major development

For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are: development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more; or development of other uses, where the floor space is 1,000 square metres or more, or the site area is one hectare or more.

Mobile infrastructure

Mobile network radio-based infrastructure involves mobile masts and antennae, of different generations (3G/4G/5G). These include macro cells, the antennae for macro cells, small cells etc.

Rooftop mast site

Many London rooftops have been developed by tower companies that lease rooftop space from the landlord and install structures. These structures are then sublet to

mobile operators that install their antennae and radio equipment on the tower company owned structures. Rooftop mast sites have become less attractive to landlords as government initiatives have reduced the rental income potential.

Small cell

Small cells are a shoebox-sized radio intended to provide mobile network capacity over a small service area (circa 250 metres). Small cells are designed to be attached to street furniture such as lamp posts, or integrated inside street furniture such as bus shelters. Small cells are typically used by mobile network operators in high footfall areas with high traffic demand, such as outside stations or on major shopping streets.

Street works site/monopole site

These terms are used to describe the pole structures that are frequently sites on Highways Agency land. They can now be up to 25 metres tall and have multiple supporting equipment cabinets near the base of the pole structure. Street work sites are typically subject to deemed consent, so grounds for objection are limited to visual impact and highway-related issues.

Telegraph pole

The traditional wooden 'telegraph pole', typically used by Openreach in sub-urban and rural areas to support the old 'copper' telephone network. Telegraph poles are now being used in fibre network deployment, with fibre lines running from the telegraph pole to connect homes gradually replacing the copper network lines.

