

Appendix – Fixed Mobile Coverage

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Illustrating the equity of having a neutral approach to PDRs for fixed and mobile infrastructure (Per submission Paragraph 31)

1. With regards to the consultation document consideration concerning the alignment between Fixed line equipment deployment and mobile equipment should be made. Fixed line have permission for the deployment of equipment cabinets and telegraph poles under a Reg 5 notification (Permitted Development without prior approval) even within protected land. Such deployment of equipment is not independent from other additional equipment unlike the mobile industry. For example, any telegraph pole installed requires additional poles to support the line. As such the allowance under Reg 5 means that a large number, or line of telegraph poles is required to deploy fibre to more remote areas whereas for superfast wireless connectivity through 5G the mobile sector requires a prior approval application or Full Planning to deploy a similarly fixed structure, but only one such structure.
2. A telegraph pole is not defined in Class 67, the assumption is that a telegraph pole is a timber structure potentially up to about 10m, however, throughout the country telegraph poles are made from all manner of materials and designs. In East Sussex many such poles are metal lattice structures, the tallest telegraph pole that Openreach has available is 22m. Consequently, Fixed line benefits from being able to deploy a line of 22m high lattice metal structures as long as they only support a line. This is welcomed and benefits the deployment of fibre but in comparison the mobile sector has to submit an application for prior approval for a similarly high structure and mobile only requires one installation to cover a very large area. The mobile monopole may be located amongst trees or benefit from a backdrop of farm buildings or set in a commercial environment but this would require an application for prior approval whereas fixed line could install a large number of similar structures across a landscape with only a Reg 5 notice.



Figure 1 Indication of extent of telegraph pole deployment under a Reg 5



Figure 2 Typical Small cell telegraph pole design

3. We would consider that revisions to Class 67 should acknowledge this disparity in technology and ignore what is broadcast from the monopole but concentrate only on the physical deployment. As such a single monopole of 17.5m should benefit from the same regulations as fixed line and be allowed under a Reg 5 as Permitted Development without prior approval.



Figure 3 Typical 15m telegraph pole Mobile installation

4. In essence a telegraph pole's function is to raise a line to a height, a mobile monopole raises the antennas to a given height, in many rural areas such as centres of villages or important transport routes it would be appropriate to install a smaller set of antennas and a telegraph pole design structure could accommodate the equipment. We would propose to align with fixed line operators and legislation that monopoles up to a height of 17.5m should be permitted development without Prior Approval, a Reg 5 notification similar to fixed line telegraph pole at present.
5. The installations indicated above in the pictures can easily be deployed in rural areas, villages edges of the built environment and benefit from the fibre backhaul being deployed under the fibre broadband projects. If the fibre is delivered into a village then the deployment of monopoles as indicated above can more easily be assimilated into the rural and village setting.
6. Fixed Line operators may well be deploying a number of telegraph poles to support the very same fibre and it would seem logical to enable mobile operators to deploy a similar structure for their antennas, thus redressing the need for complex locations set away from villages, reducing the costs, reducing the time to deploy the equipment and if possible allowing 2G/3G/4G and 5G equipment to come into the heart of many communities. The suggestion of a 15m monopole would be the shortest possible to accommodate all the equipment but the benefit to the community with both fibre and mobile connectivity could transform the viability of many such communities.



Figure 5 Example of a telegraph pole slim design supporting antennas in a rural area



Figure 6 Existing installed smaller monopoles designs similar to a telegraph pole



Figure 7 Example of Fixed Line Permitted Development Telegraph poles indicating increased number required