



SMALL CHANGES, BIG REWARDS

**Ensuring planning connects with
mobile infrastructure ambitions**





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Contents

4	Executive Summary
5	Foreword: Sean Woodcock MP
6	Introduction
8	Section 1: Context & Literature Review
12	Section 2: Barriers, Blockers & Solutions
17	Section 3: International Comparisons
21	Section 4: A Systematic Assessment of Planning as a Barrier
24	Conclusion
26	Technical Annex: Legislative and Policy Amendments

Executive Summary

- ▶ **Small changes to planning policy can unlock transformative economic benefits at zero cost to the government.** Independent estimates put the cumulative value of a full 5G rollout at between £41bn and £230bn by 2035. Unlike roads, rail, or other infrastructure, supported by public subsidy, mobile connectivity is almost entirely privately funded. The reforms in this paper require only modest amendments to secondary legislation and planning policy, requiring no primary legislation, no new public expenditure, and minimal parliamentary time. This paper focuses on the possible changes to Permitted Developed Rights highlighted by DSIT and MHCLG’s consultation, which if implemented correctly, are free to the government and can generate outsized and substantial impacts.
- ▶ **The telecoms industry is a trusted partner.** Operators have publicly signalled billions of pounds of investment by the end of the decade, serve virtually every household in the country, and operate in one of the most competitive mobile markets in Europe. Real-terms monthly retail prices have fallen year after year. The industry has demonstrated its willingness to work constructively with national and local governments, through mast-sharing, sympathetic design, early engagement, and the Code of Practice, and its commitments are publicly benchmarked by Ofcom. What the industry asks is that planning policy keeps pace with the technology it is ready to deploy.
- ▶ **95% of the build programme in the short to medium term involves upgrading existing infrastructure, not erecting new masts.** The changes sought are not about building anywhere and everywhere, or eroding the powers of the planning system. They are about enabling operators to add antennas to existing masts, adjust width and height parameters to reflect the requirements of modern 5G equipment, and carry out routine upgrades within the existing footprint. These are reforms to Permitted Development Rights and changes to the height thresholds, width allowances, and antenna limits within Part 16 of the GPDO, that can be delivered through secondary legislation.”
- ▶ **These are changes that free up local planning authority resources.** As has been well documented throughout the planning and development landscape, local authorities are constrained by budgets and work-load. These small changes would free up valuable time, cost, and resources for local planning authorities to focus on the priorities that matter most to their communities.
- ▶ **The Notice to Quit regime needs reform on two fronts:** extending the emergency deployment window from 18 to 36 months so that operators have a more realistic prospect of replacing displaced infrastructure before communities lose signal; and ensuring that developers check the impact of their schemes on existing networks before development proceeds, so that coverage is not needlessly knocked out in the first place.
- ▶ **The UK’s international competitors have already made comparable changes and are reaping the rewards.** Germany has declared telecoms deployment to be in the “overriding public interest.” Finland has introduced automatic approval mechanisms. The common lesson is that small, decisive changes to planning rules produce outsized improvements in coverage, speed, and private investment. The reforms in this paper follow that proven logic.



Foreword

Sean Woodcock
Labour Member of Parliament
for Banbury

I represent one of the most beautiful constituencies in England. Banbury, Chipping Norton, Charlbury, and the North Oxfordshire villages are places where people choose to live, work, and raise families precisely because of their character. So I understand, instinctively, the impulse to protect what we have. But I also understand what happens when protection becomes paralysis: nowhere is that tension more visible than in our planning system's treatment of mobile infrastructure.

In my constituency, I hear regularly from residents who cannot get a reliable mobile signal in their homes, from businesses in market towns whose card machines drop out, and from farmers who cannot use the precision agriculture tools that their competitors overseas take for granted. These are the daily consequences of a planning regime that, as this paper sets out in forensic detail, has failed to keep pace with the technology it is supposed to govern.

What struck me most when I first read this research was the central insight that runs through every section: the changes needed to fix this are remarkably small. We are not talking about a wholesale overhaul of planning law. We are talking about gentle, targeted reforms to permitted development rights that can be achieved through secondary legislation without consuming precious parliamentary time. The permitted development rights regime is the mechanism through which the vast majority of mast upgrades and new installations are governed, and right now it is not fit for purpose. Expanding what qualifies as permitted development so that routine 5G upgrades proceed without unnecessary prior approval applications, updating the dimensions that trigger a full planning application, and removing arbitrary caps on rooftop

antennas in protected areas would, between them, transform the speed and certainty of deployment across the country. These are not deregulatory measures in any radical sense. They are corrections to a permitted development framework that has simply failed to keep pace with the infrastructure it governs. The paper also makes a persuasive case for complementary reform of the Notice to Quit regime, where the current eighteen-month emergency deployment window is plainly insufficient, but it is the PDR reforms that form the backbone of what is proposed here, and it is those reforms that would deliver the greatest return for the least legislative effort.

This Government was elected with a mandate to grow the economy. The Prime Minister has spoken repeatedly about the need to "Build, Baby, Build." The planning reforms announced for housing have been bold and welcome. But it would be a missed opportunity of historic proportions if that same reforming energy were not applied to the digital infrastructure on which so much of our future economic growth depends. The permitted development rights reforms and encouragements for developers to consider connectivity in their designs in this paper are, in every sense, free wins: they cost the Exchequer nothing, they require no new public spending, and they can be delivered through secondary legislation without consuming precious parliamentary time.

Every day that we delay these small, sensible changes to planning policy, we are choosing slower growth, weaker public services, and poorer connectivity for the communities we represent. The evidence in this paper makes the case for reform overwhelming. I commend it to colleagues across the House, and I urge the Government to act.

Introduction

This paper makes the case for a small number of targeted reforms to planning policy that would unlock significant private investment in the UK's mobile connectivity, all at zero cost to the government. The reforms are, in essence, modest amendments to the words within existing secondary legislation and planning guidance. They do not require primary legislation, new public expenditure, or significant parliamentary time, and yet their impact would be substantial. They focus on enabling operators to upgrade existing masts with modern 5G equipment, improving coverage and speeds for communities across the country, and freeing up local planning authorities to concentrate their stretched resources on the housing and infrastructure decisions that matter most to the people they serve.

The context for these reforms is a mobile industry that, despite a challenging investment environment of declining real-terms revenues and rising regulatory costs, continues to commit significant private capital to the UK's wireless infrastructure. The Vodafone-Three merger has pledged £11bn over five years; VMO2 has committed £700m to its mobile network in 2026 alone; BT/EE has set an ambition of reaching 99% UK coverage for 5G Standalone by 2030. These commitments reflect genuine confidence in the UK market, but they are made in the context of an industry whose real-terms revenues have fallen by 18% over the past five years and which has absorbed up to £2bn in costs from the Huawei removal programme. The reforms proposed in the government's Mobile Market Review will be important in improving the investment environment further. In the meantime, the planning changes proposed in this paper are among the most direct, zero-cost ways for the government to ensure that the capital operators are committing further for communities across the UK.

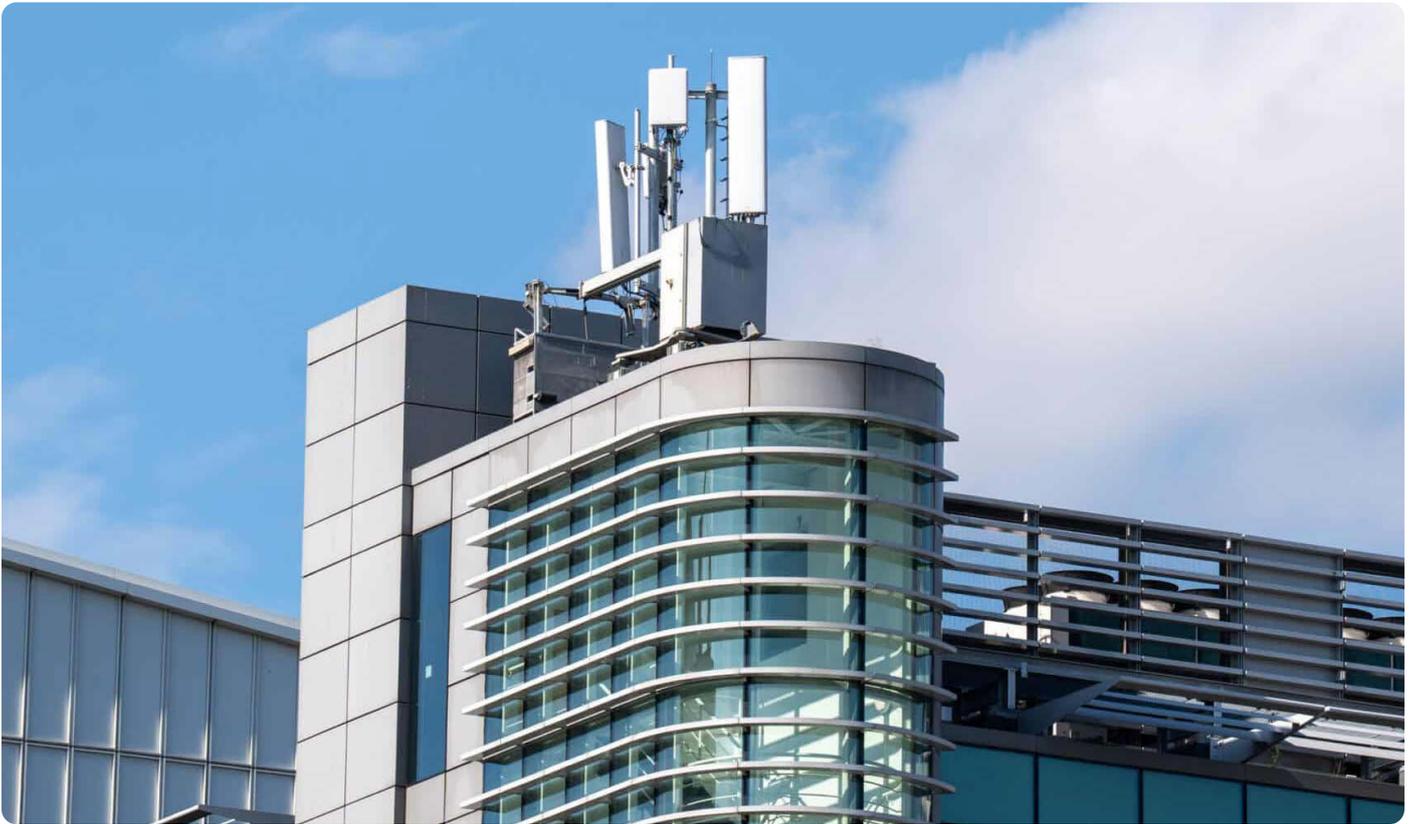
Critically, 95% of the build programme that operators wish to undertake involves upgrading existing infrastructure rather than erecting new masts in new locations. The changes sought in this paper reflect that reality by concerning the ability to add antennas to existing masts, to adjust width and height parameters to accommodate modern 5G equipment, and to carry out routine upgrades within the existing footprint without disproportionate planning processes. By bringing about targeted, proportionate updates that bring Permitted Development Rights into line with the technical requirements of current and next-generation wireless technology. The planning system works on the whole for operators, but small tweaks to the law's treatment

of telecoms infrastructure would have a significant and outsized impact for the UK as a whole.

The government has already recognised many of these barriers. In December 2025, DSIT and MHCLG published a Call for Evidence on Reforming Planning Rules to Accelerate Deployment of Digital Infrastructure, which explicitly acknowledged that the current regime may be creating avoidable delay and cost. The consultation sought views on extending the NTQ temporary deployment period, expanding permitted development rights for rooftop infrastructure on protected land, permitting taller ground-based monopoles under notification, and updating small cell definitions. The industry welcomed this consultation as an important and overdue step. This paper supports the direction of travel set out in the Call for Evidence, and in several areas argues that the government should go further, particularly on height and width thresholds, the treatment of upgrades to existing masts, and the role of developers in protecting existing wireless infrastructure during redevelopment.

The government's own Wireless Infrastructure Strategy commits to nationwide standalone 5G coverage of all populated areas by 2030: a promise on which the NHS 10-Year Plan's vision of virtual hospitals, the Department for Education's remote learning ambitions, and the levelling-up agenda's credibility in 13 to 19 million digitally excluded people's communities all now depend. This paper argues that small, pragmatic, targeted updates to England's planning rules are the missing link in delivering that connectivity — at zero cost to the taxpayer. The Technical Annex sets out specific drafted amendments that build on the proposals consulted upon.

Independent estimates suggest that a full 5G rollout could deliver between £41bn and £230bn in cumulative economic benefits by 2035, with multiplier effects for local businesses estimated at 5:1. These are benefits that flow from private investment, not public spending. The proposed reforms are, in the truest sense, free wins for a government that is, as it admits itself, low on fiscal headroom and in search of growth. The costs of the reforms are negligible; the rewards in private investment, new jobs, and wider economic growth are considerable and would be reflected across the UK, as well as spurring considerable productivity increases in our cities.



This paper also addresses the Notice to Quit (NTQ) regime, which governs what happens when site providers provide a notice to vacate or remove masts, typically as a result of site redevelopment. The current 18-month emergency deployment window is frequently insufficient for operators to find and build replacement sites, resulting in coverage loss for affected communities. The paper proposes extending this window to 36 months, which is a more realistic timescale that reflects the practical requirements of site acquisition, planning approval, and construction. Equally importantly, it proposes measures to ensure that developers check the impact of their schemes on existing wireless networks before development proceeds, so that coverage is not needlessly displaced in the first place.

The UK's international competitors have concluded that mobile infrastructure is too important to be held back by planning processes designed for a different

era, and have made comparable reforms. This paper asks only that the UK absorbs the same lesson: that small, targeted changes to planning rules produce outsized improvements in coverage, speed, and private investment, at no cost to the public purse.

This paper concludes with a technical annex of drafted amendments spanning the NPPF, General Permitted Development Rights, and the Town & Country Planning Act 1990. These amendments build on and extend the reforms consulted upon in the government's December 2025 Call for Evidence, and are intended as a constructive contribution to the policy process that DSIT and MHCLG have initiated. Whilst the government is at liberty to draft and submit its own amendments to its legislation, the author believes that these are useful pointers for how best to deliver the considerable benefits offered by the telecoms industry's investment for the whole of the country.

Section 1: Context & Literature Review

The UK telecoms landscape is characterised by healthy competition, with a market that works well for consumers. Ofcom ranks the United Kingdom as having the second most competitive pricing market for mobile plans, with only France exceeding in competitiveness.. Since 2020, the real terms cost of the average monthly prices for monthly mobile data use fell from £14.55 in 2020 to £11.61 in 2025, as per Ofcom.

The capex environment for UK mobile operators is challenging, and it is important to understand why. Revenues have remained broadly flat in cash terms over the past five years, while declining by 18% in real terms over the same period, as Ofcom's regulatory framework and intense market competition have continued to drive consumer prices down. Average revenue per user has fallen from around £19 in 2015 to approximately £10 in 2025. At the same time, the demands on operators have grown considerably: the Huawei removal programme alone absorbed up to £2bn in costs across the industry; operators committed £532m of their own capital to the Shared Rural Network; and the ongoing deployment of 5G and 5G Standalone, necessary to meet surging data demand, which has grown by 495% since 2018, requires sustained and significant investment in network infrastructure. Overall capex by MNOs into mobile networks has fallen from £2.3bn in 2020 to £1.8bn in 2024, a pattern reflected across European markets where operators face similar pressures. The result is an industry that is being asked to do more with less and where removing unnecessary planning barriers, at no cost to the government, is one of the most direct ways to ensure that the capital operators do invest goes further for communities across the UK.

At the same time, Vodafone and Three's merger pledged an £11bn investment over 5 years into the sector. In addition to this the other operators in the market are also investing large sums. For example, VMO2 has recently announced an investment of £700m into the mobile network through its Mobile Transformation Plan and BT/EE have set an ambition of reaching 99% UK coverage for 5G SA by 2030. However, there are concerns specific to the UK, including the manner in which planning policy often precludes achieving the latest upgrades for consumers who often complain about slow speeds. As will be made clear, it is planning which is a unique barrier to this significant investment boosting communities across the UK.

Estimates vary on the impact of 5G and 5G Standalone (5G SA) connectivity. Some reports, such as the Assembly report argue that a complete roll-out of these highly resilient networks could deliver £230bn in economic benefits by 2035. Others, such as Cambridge Econometrics and Analysys Mason, argue that a wider 5G roll-out could deliver between £41bn and £159bn in cumulative economic value by 2035. One of the primary barriers identified by Analysis Masons' report is inconsistencies in applying planning law and local authorities not following best-practice. What is clear is that a wider 5G rollout is akin to standard infrastructure owing to its capabilities to achieve growth; highways, railways, and ports carry goods, services, and people, and are backed by a £120bn public infrastructure delivery budget. Meanwhile, 5G connectivity carries data in a similar manner. It is easily analogous that our telecoms infrastructure is equivalent to data-super highways, but not given the consideration by the government as tangible motorways.

It is worth re-emphasising this point. Physical infrastructure has often been a sore-spot for Western Governments, and the British government is no different. It is felt by constituents in the roads, railways, and airports they use. This is, perhaps, why so much public money (at a time when there is so little headroom) and attention is diverted to these physical assets. As stated in my introduction, it is other pieces of infrastructure (particularly wireless connectivity) that have been entirely privately funded, have for the most part worked smoothly, and are now ingrained in almost every business, government department, and household, that are left quietly in the background. The ultimate irony of this state of affairs is that private capital for connectivity already exists: ready to deploy, and at no cost to the government. Instead it is the blockage of bureaucracy, and thus at high cost to society, that it cannot be deployed in as impactful a way as we might hope. The government can, and should, amend these small areas of Permitted Development policy (as will be explored) to allow for the upgrades of masts, and thus unleash significant capitalisation into the country at no cost to itself.

The government's own Wireless Infrastructure Strategy commits to nationwide standalone 5G coverage of all populated areas by 2030 – a promise on which the NHS 10-Year Plan's vision of virtual hospitals and digital-first care, the Department for Education's remote learning

ambitions, and the levelling-up agenda's credibility in left-behind towns all now depend. NHS England estimates that digitising GP appointments alone could save £899 million; the [Digital Poverty Alliance](#) puts the number of people experiencing digital exclusion at between 13 and 19 million, disproportionately concentrated in the rural and coastal communities where mobile coverage is weakest and planning barriers are highest. Small changes to allow for upgrades will resonate across the economy and country, contributing to much more inclusion, lower digital inequalities and their corresponding benefits. In order to rectify these challenges, the government need only make small changes to permitted development rights legislation, as this paper will set out.

The direct investment in local communities from new and upgraded masts is itself significant, with each rooftop acquisition costing around £180,000 before construction has been initiated, representing meaningful inward investment in the local area. The second and third order benefits are larger still, with some studies estimating [multiplier effects for local businesses of 5:1](#), suggesting that the economic benefits for productivity, wage growth, and profitability are overwhelming. As many policymakers, academics, and economists have highlighted, [the UK's non-digital infrastructure is fraying](#), and yet its digital infrastructure is doing well but should be permitted to receive much more investment.

The question now falls as to how best to overcome these blockers in a way which best serves communities, providers, and customers (both for businesses, households, and individuals). It is the aim of this paper to bring forward constructive, sustainable solutions for the growing, dynamic, and data-hungry economy, which hold zero cost for the government and engenders significant economic and social benefits.

Permitted Development Rights (PDR) sit at the core of unlocking significant connectivity for the UK. At present, there are a number of outmoded restrictions on upgrading the rooftop installations of 4G and 5G masts. The designated 'light-touch' system of prior approval is often treated as a full planning application with regards to scrutiny - this is despite the long-track record of MNOs responsibly maintaining masts and proactively submitting the full required paperwork. The heavy-handed conditions, despite their intentions, imposed by local authorities costs tens of thousands of pounds and creates significant delays - this is not even considering the resource implications for both the providers and the local authorities' already overstretched planning departments. In order to resolve this, prior notification should be the optimal route for PDR, rather than prior approval.

The Notice to Quit regime presents challenges on two fronts: first, the inadequacy of the current framework for managing existing sites when an NTQ is served; and second, the absence of any established expectation on developers to consider the impact of their schemes on existing wireless networks before development proceeds. On the first point, under the NTQ regime as set out in [Schedule 3A of the Communications Act 2003](#), if a site provider wishes to have a site vacated, they must serve at least 18 months' notice and demonstrate one of a limited set of [statutory grounds](#), most commonly a

planned redevelopment. The timescales are frequently insufficient for operators to find suitable alternatives and deploy them. Finding a replacement site, especially in high-density areas, requires rigorous site searches and land surveys, legal agreements, full planning applications, and integration into the power network at a time when grid connections are slow. Obtaining planning approval alone often takes several months, and significant further delays can be caused by third parties such as regional electricity companies or Highways Authorities. Should the 18-month window expire without the new permanent site being ready, the operator must submit a retrospective planning application to retain temporary structures needed to bridge the connectivity gap. The growing volume of NTQs, particularly in London and other high-density areas, puts a considerable strain on both operator and local authority resources. On the second point, the role of developers in preventing unnecessary displacement of wireless infrastructure is addressed in detail later in this paper.

Conservation Areas are valued for their protection of special architectural and historic interest under the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#), and this paper does not call for any change to their nature or designation. However, their limitations on mast upgrades affect large swathes of the UK's most productive neighbourhoods, particularly in London, where there is considerable overlap between developed areas and Conservation Areas. As the table overleaf shows, this is a significant feature of inner London boroughs. Analysis by [Ookla and SpeedTest](#) has found that London's median download speeds sit well below what might be expected of the UK's most economically productive city, lagging behind a number of significantly smaller conurbations. This is not a reflection of insufficient investment appetite, but rather a direct consequence of the planning restrictions that this paper examines. Small changes to the PDR framework would allow operators to upgrade existing infrastructure and improve speeds for millions of Londoners, businesses, and visitors at no cost to the public purse.

Rooftop installations are a critical innovation for rolling out connectivity in urban conurbations. The 2019 [new standards announcement](#) by London City Hall, aimed to help improve digital connectivity for businesses, has failed to deliver the requisite connectivity demanded by London's growing population and economy. As a [LondonFirst](#) review demonstrated, authorities have disparate approaches to urban design and planning policies, which causes significant inconsistencies for city-wide deployment of wireless infrastructure. Greater planning utilisation of rooftop installations, however, provides a clear route down the political and policy divide. As [Create Streets](#) have highlighted, it is only the concern of birds for what appears on a roof, with some caveats for sightlines. It is why public art, benches, bins, and other street architecture remain on the ground and ventilation systems, antenna, and indeed, masts, go on the roof - it is a simple explanation, but one which is widely used across Europe in urban areas. The existing permitted development framework should be updated to ensure that rooftop installations can proceed without disproportionate planning processes, reflecting the minimal visual impact of infrastructure that is invisible from street level.

When stepping back and looking at a UK wide comparison of cities and their speeds, sites, and populations, we note that there are significant asymmetries between conurbations. On a per-capita basis, Manchester boasts both the highest mast/capita score and fourth highest speed, whereas

London languishes towards the bottom. A lot of these asymmetries can be reduced down to local leadership of LPA's - Manchester as a case study has been arrived at repeatedly.

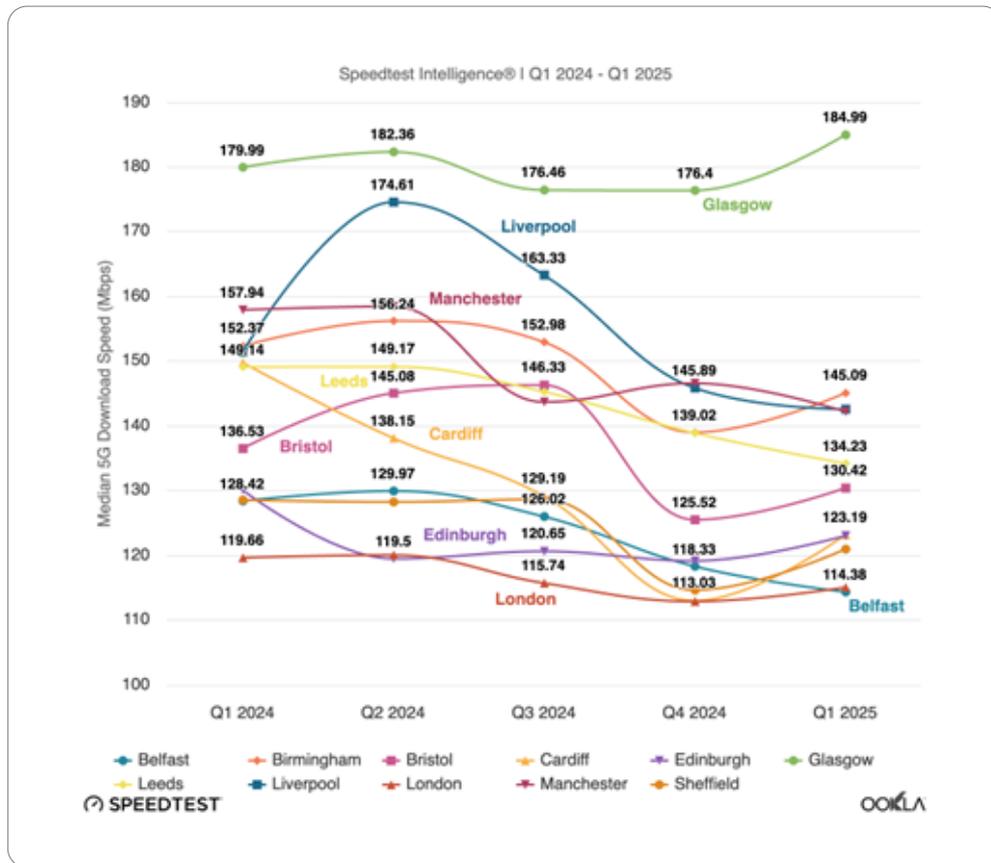


Figure 1: Median Download Speed (/Mbps) Speedtest Intelligence

Figure 2: 5G masts per 10,000 population

		Est. Sites	Population (2021)	5G Median Download Speed (Mbps)
Manchester	14.9	820	552,000	142.2
Newcastle	9.3	280	300,196	—
Birmingham	9.2	1,050	1,144,900	145.1
Liverpool	9.1	440	486,100	142.6
Cardiff	8.5	310	362,756	123.2
Edinburgh	8.5	450	527,620	123.1
Belfast	8.4	290	345,418	114.4
Glasgow	8.2	520	635,640	185.0
Bristol	8.0	380	472,400	130.4
Nottingham	8.0	260	323,700	—
Southampton	7.9	200	252,796	—
Leicester	7.6	280	368,600	—
Hull	7.3	190	259,778	—
Coventry	7.2	250	345,385	—
Leeds	7.1	580	812,000	134.2
Sheffield	6.6	370	556,500	121.0
London	6.6	5,800	8,799,800	115.1
Derby	5.8	150	257,174	—
Stoke-on-Trent	5.5	140	256,375	—
Plymouth	4.9	130	264,200	—

Section 2: Barriers, Blockers & Solutions

How Masts Get Built: The Planning Regime for Mobile Infrastructure

This section examines the Permitted Development Rights framework under [Part 16 of the GPDO](#) that governs how mobile infrastructure is built and upgraded in England, and identifies the specific points where small changes to these rights would have the greatest impact on coverage, speed, and investment. The [government's December 2025 Call for Evidence](#) consulted on reforms to several of these PDR provisions; this paper supports that direction and, in the areas identified below, argues the case for going further.

The deployment of mobile infrastructure in England is governed by [Part 16 of Schedule 2 to the Town and Country Planning \(General Permitted Development\) \(England\) Order 2015](#), as amended most recently in April 2022. This framework establishes a tiered system of planning control that varies according to the type of development, the height of the structure, and the sensitivity of the land on which it is proposed.

At its most permissive, the system grants automatic permitted development rights for minor works, small antennas, equipment cabinets, and modest alterations to existing masts, subject only to a requirement that the operator notify the local planning authority (LPA) and allow 28 days before commencing. However, the definition of “modest” here is loosely defined and lacks clarity, and is often a forcing function in the inconsistencies of planning decisions. This lack of clarity, for example, can create significant legal hurdles to responsible and sensible schemes, slowing down maintenance and upgrades, and ultimately digitally disconnects local communities. At its most restrictive, the system requires a full planning application, assessed against the local development plan, national policy, and material planning considerations. Between these two columns sits the mechanism that governs most mast deployments: prior approval.

The Three Tiers of Planning Approval

- **Tier 1 - Permitted Development with Notification Only.** Certain low-impact works may proceed with only a written notification to the LPA. These include minor upgrades to existing masts where the height and width remain within prescribed limits, the installation of small cell systems, and some equipment housing. For these works, the LPA cannot refuse consent based on planning merits (such as appearance or neighbor impact). They can only intervene if the proposed work exceeds the specific size limits set out in the General Permitted Development Order. If the proposal is compliant, the operator provides notice and may proceed after 28 days.
- **Tier 2 - Permitted Development with Prior Approval.** The majority of significant mast work falls into this category. This includes the installation of new ground-based masts up to 30 metres on unprotected land (or 25 metres on protected land and highway), the replacement or alteration of existing masts exceeding the aforementioned notification thresholds, and the installation of building-based masts above 6 metres. Prior approval is a lighter-touch process than a full planning application: the LPA may only consider the siting and appearance of the proposed development, not whether a mast is needed in principle. However, in most cases the application requires submission of the same technical documents and professional reports. The LPA has 56 days to determine the application. If no decision is made within that window, the operator may proceed with the “deemed approval” provision. However, LPAs retain the power to refuse, and operators must then either revise the proposal or appeal, or in many cases, transfer the investment to other areas. This is another example of planning policy disconnecting or undeserving communities where investment is ready to act – only small tweaks to this policy could yield significant results across the country.
- **Tier 3 - Full Planning Permission.** Where a proposed mast exceeds the height or dimensional limits set by Part 16, or falls on a site of special scientific interest, full planning permission is required. This is the standard planning application process, assessed against the development plan and the National Planning Policy Framework (NPPF). There is no statutory time limit equivalent to the 56-day prior approval window, though the government’s target for determination of minor applications is 8 weeks.

The Protected Land Distinction

A critical feature of the regime is the distinction between “unprotected” land and Article 2(3) land. This is commonly referred to as “protected land.” Article 2(3) land encompasses Conservation Areas, Areas of Outstanding Natural Beauty (now National Landscapes), National Parks, World Heritage Sites, and the Broads. On protected land, permitted development rights are significantly more restricted: height thresholds are lower, width tolerances are tighter, antenna limits on rooftops are capped at three, and certain classes of development that would require only notification on unprotected land require prior approval, or are excluded altogether.

This paper does not propose any change to the status or designation of Conservation Areas or other protected land. The concern is that the current restrictions, applied in the telecoms context, risk locking the communities, businesses, and visitors within these areas out of the connectivity that the rest of the country increasingly takes for granted. The small changes proposed in this paper would ensure that these communities are not left behind, while fully respecting the protections that these designations provide.

As the analysis in this paper demonstrates, the practical effect of this distinction in urban settings, particularly in London, is considerable. Conservation Areas overlap extensively with precisely the areas of highest population density, economic productivity, and data demand. The regime was designed to preserve architectural and historic character, but its unintended consequence in the telecoms context is that communities within these areas receive worse connectivity than their neighbours, for reasons unrelated to the street-level experience that Conservation Area designation exists to protect. The reforms proposed in this paper would address this disparity through proportionate changes to PDR thresholds, enabling operators to carry out routine upgrades within the existing footprint without disproportionate planning processes.

Width Restrictions and the Sharing Paradox

Government policy explicitly encourages mast-sharing between operators, and the 2022 reforms were partly designed to facilitate it. Yet the width restrictions in Part 16 work against this objective. To accommodate additional 5G equipment from multiple operators, existing masts frequently need to be strengthened, which means increasing their width. Where the increase exceeds the permitted threshold (one-half of the original width, or 2 metres, whichever is greater, for masts of 1 metre or more in width), the operator must submit a full planning application.

The irony is that mast-sharing is the single most effective way to reduce the total number of masts in the landscape, which is precisely the outcome that planning authorities, heritage bodies, and local communities all prefer. Yet the planning system penalises the physical alteration needed to make sharing possible.

The benefits of addressing these width restrictions extend beyond operators and communities. Every application that currently requires full planning permission because a width threshold has been exceeded is an application that consumes LPA resources that could be directed towards the housing, commercial, and public infrastructure decisions that local authorities are rightly prioritised to address. Updating these thresholds would reduce the volume of telecom applications that reach planning committees, freeing up capacity in departments that are already under considerable pressure.

Updating the width threshold is a PDR reform that can be delivered through a simple amendment to Part 16 of the GPDO. It is notable that the government’s Call for Evidence did not consult on width restrictions, this paper argues that it should be included in the reforms taken forward, given its direct relevance to the government’s own stated objective of facilitating mast-sharing. The NTQ reforms that follow are complementary, addressing a distinct but related set of barriers to maintaining and replacing existing infrastructure.

The Notice-to-Quit Regime: Developer Obligations and Existing Infrastructure

In order to build and operate telecoms infrastructure on a site, the telecoms operator must reach an agreement with the landowner. This relationship is regulated under [Schedule 3A of the Communications Act 2003](#), which sets out the framework governing agreements between operators and site providers. If a landowner wishes to have a site vacated, they must serve a Notice to Quit (NTQ) with a minimum of 18 months’ notice, specifying one of a limited set of [statutory grounds](#), which is most commonly, a planned redevelopment of the site. The operator may serve a counter-notice, and the agreement can only be cancelled if the [Upper Tribunal](#) agrees the ground is established. Once the notice has been processed, the operator must find a replacement site, secure a new agreement (or Tribunal order), obtain any necessary planning permissions, and build and commission the replacement infrastructure all before removing the existing apparatus. It has been estimated that the daily cost to a local economy is £6,000, where a mast cannot be replaced in a timely fashion. These costs are borne out through fewer transactions and service fulfilments, fewer remote meetings and consultations with medical practitioners, and other activities that have moved to digital in recent years.

Developer Obligations: Preventing Unnecessary Displacement

Further to changes to this particular regime, the increased proliferation of NTQs, especially in built-up areas as redevelopment scales-up, could be better dealt with by reforming PDR to accommodate reality. In built-up areas such as London, most redevelopments can result in an NTQ, and consequently a blockage amongst telecoms networks that are time-consuming to resolve. Indeed, when local planning authorities

consider new applications for redevelopment, mobile connectivity is almost never mentioned, despite it being one of the most impactful externalities of any major scheme. A planning officer assessing a redevelopment proposal will routinely require transport assessments, flood risk assessments, ecological surveys, and energy statements. A planning committee can approve the demolition of a building that hosts a mast serving an entire neighbourhood without any obligation to ask whether that infrastructure exists, what its removal will mean for local coverage, or what the developer proposes to do about it. The result is that NTQs are triggered as an afterthought of the development process, rather than being anticipated and managed within it. This is not a gap that can be filled by guidance alone, as we have seen from the limitations of the existing Code of Practice, which is advisory, not binding, and whose effectiveness depends entirely on voluntary compliance. It requires the kind of small, structural change to the information that accompanies planning applications, and the considerations that LPAs are directed to weigh, that this paper proposes.

Before addressing the challenges of managing existing sites when an NTQ is served, it is important to recognise that many NTQs could be anticipated and managed within the development process itself, rather than being triggered as an afterthought. There is a dimension to this challenge which has not received commensurate attention in the process of undertaking planning permissions. The growing proliferation of NTQs, driven overwhelmingly by redevelopment, particularly in high-density urban areas such as London, is not an act of nature. Instead, it is the foreseeable consequence of a planning system that allows developers (who are acting entirely rationally and within the law) to proceed with schemes that displace critical wireless infrastructure without much consideration, mitigation, or proposed replacement of the connectivity their developments disrupt. A developer submitting an application for a major scheme is required to assess their impact on drainage, transport, ecology, air quality, and noise – they must declare the presence of listed buildings and contaminated land. Yet there is often little to no consideration in respect of telecommunications infrastructure, despite the fact that a single displaced mast can eliminate mobile connectivity for an entire neighbourhood for months at a time. Addressing the NTQ regime after the fact is necessary, but on its own it is insufficient. This paper does not argue for new statutory obligations on developers. Instead, it urges the government to create a dialogue in which developers and planners are actively encouraged to consider the impact of their schemes on wireless connectivity, and in which local planning authorities have the tools and the policy basis to factor connectivity into their decisions.

As a baseline example: the mast, or its effects, are displaced by the new development, leading to the serving of an NTQ, and the operator enters the reactive cycle described above wherein it moves at pace to find a replacement site within an 18-month window. As demonstrated, this is frequently unachievable within the current environment. Unfortunately, this example can be so easily drawn owing to the predictability and frequency of the consequences of a system that treats wireless connectivity as invisible.

The reforms proposed in this paper address this gap through three complementary measures, each of which is a small, proportionate step towards a framework in which developers are encouraged to consider wireless infrastructure alongside other forms of essential services, and at zero cost to the government.

First, this paper recommends that developers be encouraged to disclose the presence of any telecommunications infrastructure on their application site, in a manner analogous to the existing approach for listed building declarations. This is a simple disclosure step (not a new statutory requirement) that would ensure that the local planning authority, the operator, and the community are aware of what is at stake before a planning decision is made. At present, a planning committee can approve a redevelopment that will eliminate mobile coverage for a town centre without anyone in the room being aware that a mast exists on the site. It is a small change but one that brings wireless infrastructure into the same framework of consideration that already exists for heritage, ecology, and contamination.

Second, a Relocation and Resiting Clause, with local planning authorities should be encouraged to consider, when granting planning consent that affects telecommunications infrastructure, whether it would be appropriate to allow a reasonable and mutually agreed period for the telecommunications provider to initiate a comprehensive site search and formal relocation plan. This is not a proposed statutory obligation but rather a recommended approach. It ensures that the operator has a realistic opportunity to maintain coverage continuity, rather than being presented with a *fait accompli* when the demolition contractor arrives. Importantly, it also creates a structured dialogue between the developer and the operator at the earliest possible stage of the kind of early engagement that, as this paper's Manchester case study demonstrates, produces the best outcomes for all parties.

Third, wireless connectivity as a material planning consideration. The proposed amendment to NPPF paragraph 121(b) would require local planning authorities to consider whether new buildings or structures would interfere with existing broadcast and electronic communications services, and to consider the potential to amend the design of developments to retain connectivity infrastructure. Where the loss of infrastructure is an unavoidable consequence of development (as is often the case in built-up areas), authorities should attach significant weight to the retention of services at a replacement site nearby. This gives LPAs an explicit mandate to weigh connectivity impact alongside the other material considerations they already assess and provides a policy basis for the Relocation and Resiting Clause described above. As with so many of the recommendations in this paper, this is a small change in words within existing policy, but one that would have a significant impact on how developments interact with existing connectivity.

Taken together, these four measures create a coherent framework of developer responsibility for wireless connectivity. They do not prohibit development, slow it down unreasonably, or impose significant new costs. They encourage developers to do for wireless infrastructure what they already do for drainage,

ecology, and transport: consider the impact, disclose it, and take proportionate steps to address it. As with the PDR reforms proposed in this paper, these are small changes that can be achieved through secondary legislation and policy amendments, require no new public expenditure, and would have an outsized positive impact on communities, businesses, and public services across the country.

Existing On-Site Infrastructure: Managing Displacement When It Occurs

The planning system allows for emergency temporary deployment of moveable apparatus for up to 18 months following a NTQ. In practice, however, 18 months is frequently insufficient. The operator must identify a suitable alternative site, negotiate access, submit and secure planning approval (a process which, if refused and appealed, can itself take 12 months), and complete the physical build. Industry reports that a significant number of temporary sites are ultimately lost when the 18-month window expires before the permanent replacement is live, resulting in lower coverage for the communities served by that infrastructure.

The practical consequences of the Notice to Quit regime for operators are already visible in communities across England, but most especially in London. There have been a number of examples in recent years. For example, [Skelmersdale's town centre](#) lost signal after a base station was removed in July 2025. In [Horfield, Bristol](#), customers lost coverage after a mast had to be removed in December 2025 because the host building was being redeveloped. These are established towns and urban neighbourhoods where a single landlord dispute or redevelopment decision can eliminate mobile connectivity for months at a time, and something that can be amended through changes to the NTQ regime.

The consequences of the NTQ regime are particularly acute in London, where the pace of redevelopment is highest and the planning constraints on replacement infrastructure are most severe. Investigative reporting by [London Centric](#) has documented how the rapid redevelopment of the capital is stripping masts from buildings across central London, with older buildings that host functioning masts being demolished and the mobile networks left scrambling to find suitable nearby replacement sites. The practical effects are felt daily by Londoners. Parts of central London, from Soho to Covent Garden, experience data blackouts on busy evenings, and commuters leaving Waterloo through south-west London face extended periods without a usable data connection. As [Time Out](#) summarised, London's local authorities face a catch-22 where residents complain about poor phone signals, but also complain when new masts are proposed to fix it. The NTQ regime sits at the heart of this dysfunction, because each redevelopment that displaces a mast triggers a replacement cycle that the planning system is too slow and too inconsistent to resolve before coverage is lost.

The most extensively documented NTQ case study in the South East is [Brentwood, Essex](#), where a rooftop redevelopment triggered exactly the cascade of failures that this paper warns against. In October 2018, the owner of Ewing House on Kings Road served a Notice to Quit on all four national mobile network operators, requiring removal of all equipment by the end of June 2020.

The NTQ was driven by a planning appeal: [Brentwood Council](#) had initially refused the rooftop extension, but the Planning Inspectorate overturned that decision on appeal without any condition requiring the replacement of the mast infrastructure the development would displace. When the masts were removed in June 2020, an emergency mast near Brentwood Station provided insufficient coverage, and residents across the town centre and as far as Hartswood Road lost signal on all four networks. What followed was a protracted planning failure: [applications for replacement masts locally](#) were refused by the council. Structural surveys on the council's own building then failed, requiring redesigns. The coverage gap persisted [well into 2021](#).

The pattern is not confined to individual case studies. The [government's own Call for Evidence](#) acknowledged that the current regime has "resulted in a sizable number of temporary sites ultimately being lost when the window expired before the permanent site was live," and industry reports that NTQs are an increasing source of coverage loss across the country, driven overwhelmingly by redevelopment in high-density urban areas. In London, where redevelopment is most concentrated and Conservation Area restrictions are most extensive, the NTQ problem is compounded by the difficulty of finding replacement sites within the planning framework. As reported by [The Week](#), the UK's planning system makes it difficult to install the masts needed for adequate coverage, and this difficulty is most acute in the capital.

The Code of Practice

Supplementing the statutory framework is the [Code of Practice for Wireless Network Development in England](#) (updated 2022), which provides non-statutory guidance to operators, LPAs, and other stakeholders. The Code of Practice encourages pre-application consultation, site-sharing, sympathetic design, and consideration of alternatives. It is advisory, not binding, and its recommendations carry no statutory weight in planning decisions. Its effectiveness depends entirely on voluntary compliance by both operators and LPAs, a point to which we return in the policy analysis.

The 2025 Call for Evidence

On 18 December 2025, the government published a Call for Evidence entitled "[Reforming Planning Rules to Accelerate Deployment of Digital Infrastructure](#)," led jointly by DSIT and MHCLG. The Call for Evidence, which closed on 26 February 2026, explicitly acknowledged that the current regime may be creating avoidable delay and cost, and sought views on extending the NTQ temporary deployment period from 18 to 36 months, expanding permitted development rights for rooftop infrastructure on protected land, permitting taller ground-based monopoles under notification rather than prior approval, bringing fibre exchanges into permitted development, and updating the small cell system definitions. As explored above, these expansions should move forward if the government wishes to achieve its own stated policy goals, and bring the UK 'up to speed' with its competitors and neighbours.

The government noted that while aggregate planning statistics suggest most prior approval applications across all sectors are approved, telecoms infrastructure

is not separately identified in published data, making it impossible to draw sector-specific conclusions. Industry, meanwhile, reports that a significant proportion of prior approval applications for masts are refused, and that a large share of those refusals are subsequently overturned on appeal, but only after months of delay and material additional cost.

Case Study: Manchester – A British Leader in Connectivity

Ookla's Q1 2025 study put Manchester's median 5G download speed at 142.24 Mbps, fourth nationally and comfortably ahead of London at 115.08 Mbps. Across all mobile technologies, it is one of only two British cities to make the global rankings at all. London, with 2.8 times Manchester's GDP per capita and an unrivalled concentration of private capital, trails behind owing to the aforementioned policy problems that this paper extrapolates.

Manchester City Council published a [Digital Strategy in 2021](#) with 63 cross-sector partners and a disarmingly simple commitment at its core: "excellent and accessible digital infrastructure everywhere." The council backed this with a dedicated [Digital Champions](#) resource inside the authority, leading direct engagement with operators on infrastructure planning and deployment. By creating a single point of contact for operators and embedding digital infrastructure within the council's wider strategic planning, Manchester has been able to coordinate deployment in a way that reflects local priorities while giving operators the certainty they need to commit investment. The council did not wait for applications to arrive and navigate the prior approval process, but chose instead to proactively engage with operators to identify opportunities and resolve constraints early. Greater Manchester Combined Authority [reinforced the ecosystem from above](#), with 3,000 km of civic fibre through the GM One Network, £3 million from the 5G Innovation Regions programme

from [DSIT](#), and a lineage of testbeds stretching from the CityVerve IoT demonstrator to today's AI-driven Smart Transport Corridors.

Despite the admirable progress it has made, Manchester ranks only 72nd globally, which is a sobering position for a city that considers itself a world-class digital hub. The lesson is that a council which treats wireless infrastructure as a strategic priority, resources it properly, and opens its public assets to deployment can meaningfully shift outcomes within the existing planning framework (even if they cannot fully solve the problem currently using that approach), and that most councils do neither.

The PDR reforms proposed in this paper would make every authority more like Manchester by default, by ensuring that routine mast upgrades can proceed without disproportionate planning processes regardless of whether a local authority has a dedicated digital strategy or the staff to deliver it. Should the reforms suggested in this paper go forward, we can expect to see the successes of Manchester rolled out across the country.

Section 3: International Comparisons

Examples from Elsewhere: How Peer Nations Regulate Mast Deployment

The UK does not regulate mobile infrastructure in a vacuum. Its principal economic competitors, and the nations that consistently outperform it on connectivity metrics, have each undertaken significant reforms to their planning and permitting regimes for telecommunications infrastructure.

The common thread is unmistakable, wherein countries that have streamlined approvals, reduced local veto power over routine upgrades (regardless of local political views), and established clear statutory timelines for decision-making have achieved faster rollout, greater coverage, and higher network quality. It is important to review competitors to see how other nations are achieving higher connectivity, although we do not recommend that wholesale change is required. *Indeed, we recommend small scale changes within our system, as highlighted in this report, can have an outsized impact.*

Germany: “Overriding Public Interest”

Germany’s experience is particularly instructive because it shares several of the UK’s structural challenges, such as a centralised system with significant planning authority, strong heritage and environmental protections, and a history of NIMBY opposition to mast installations. The 16 Länder maintain their own approval procedures, creating the same kind of inconsistency between planning authorities that plagues the English system.

In June 2025, the Bundestag and Bundesrat approved a landmark amendment to the Telecommunications Act (TKG). The reform’s centrepiece is the statutory declaration that “the laying and modification of telecommunications lines for the expansion of public telecommunications networks” is “in the overriding public interest” until 31 December 2030. This designation, borrowed from the legal framework used to accelerate renewable energy infrastructure, has found new life through the expansion of Germany’s telecoms infrastructure. In German administrative law, when an activity is declared to be in the overriding public interest, it must be given priority in approval procedures when competing interests are weighed. It may be compared to a constant call-in power, as issued by the Secretary of

State in the UK. Planning authorities can no longer treat mast deployment as a discretionary amenity question to be balanced against local preferences.

Where connectivity coverage gaps exist, it is the fault of legislation, policy, and planning rules. In Germany, a new planning amendment to the Telecommunications Act demonstrates the universality of this diagnosis – the amendment seeks to achieve full expansion rights for telcos in providing coverage for masts, which the government noted would increase efficiency and coverage. Finland, which sits at the top of Europe’s GSMA ranking, has amended its permitting regime to create: “a centralized permit platform, allowing applicants to submit electronic requests for permissions and installation rights. The law also introduces a “silent approval” mechanism. *If an authority does not process an application within four months, the permit is automatically granted.*”

The German industry association VATM described the amendment as “a necessary breakthrough for the rapid roll-out of digital infrastructure – especially in rural areas,” noting that it creates conditions for “more efficient approval procedures and removes long-standing planning obstacles – for example in nature conservation and heritage protection.” Further amendments, currently in consultation, propose an alternative notification procedure (analogous to the UK’s prior notification regime), digital application and approval processes, and provisions prioritising the connection of mobile phone masts to the nearest power grid.

The German reform is instructive for two reasons. First, it demonstrates that a comparable European economy with strong heritage protections has concluded that the status quo is inadequate and that legislative intervention, not mere guidance, is required. Second, the “overriding public interest” mechanism offers a model for the UK. The proposed amendment to NPPF Section 10 in this paper’s Technical Annex, directing LPAs to give “significant weight” to the economic and social benefits of digital connectivity, pursues the same objective through the English planning system’s own vocabulary.

Finland: Silent Approval and Centralised Permitting

Finland consistently ranks among Europe's top performers on connectivity metrics: the GSMA's Mobile Economy Europe 2025 report identifies Finland as one of the European nations where 5G adoption rates have exceeded 40 per cent. Finland's approach to planning regulation for telecommunications infrastructure reflects a fundamentally different philosophy to the UK's.

In 2025, Finland introduced legislation (implementing [EU Regulation 2024/1309](#), the Gigabit Infrastructure Act) establishing a centralised permit platform ([the Ryhti system](#)) allowing applicants to submit electronic requests for permissions and installation rights. The law introduces a "silent approval" mechanism: if an authority does not process an application within four months, the permit is automatically granted. Minor repairs and maintenance are exempt from the permitting process entirely. Nationally critical infrastructure, including healthcare communication systems, is also exempt.

Turning to England, the prior approval process allows LPAs 56 days to determine an application, with deemed approval if no decision is made, but only for prior approval applications. Full planning applications carry no such automatic approval mechanism. And even within the prior approval system, the 56-day window has been rendered less effective by inconsistent application: some LPAs treat the deadline as a genuine constraint, while others allow applications to drift or are extended (with little choice by the applicant), relying on operators' reluctance to commence development without an explicit decision.

Finland's silent approval mechanism goes further than the UK's deemed approval. It applies not merely to a limited class of permitted development but to the full range of telecoms permitting. It imposes a four-month maximum, generous by comparison with the UK's 56 days, but backstopped by automatic approval rather than the ambiguity that sometimes surrounds deemed approval in England. And by centralising the platform, Finland eliminates the inconsistency that arises when 333 English LPAs each interpret the same statutory framework differently.

The United States: Federal Pre-emption and Shot Clocks

The US approach is the most aggressive of the above comparator jurisdictions. In September 2018, the Federal Communications Commission (FCC) issued its '[Small Cell Order](#)' which fundamentally restructured the relationship between federal regulatory authority and state/local planning control over wireless infrastructure.

The 'Small Cell Order' achieved four things. First, it established binding "shot clocks", or mandatory deadlines, for local government review of wireless infrastructure applications: 60 days for co-locations of small wireless facilities on existing structures, and 90 days for new sites. Second, it stipulates that failure to act within the aforementioned period constitutes a "presumptive prohibition" of service under the Telecommunications Act, giving operators immediate grounds for legal action. In the more litigious US environment, this is suitable, whereas in the UK, it is

analogous to the deemed approval regime. Third, it capped the fees that local governments could charge for processing applications at levels the FCC determined to be cost-based: \$500 for an initial application covering up to five small cells, and \$270 per year for right-of-way access per small cell. Fourth, it pre-empted state and local aesthetic requirements that were not "reasonable" and "no more burdensome than those applied to other types of infrastructure deployments."

The FCC's approach was not without controversy, as the National League of Cities and the National Association of Counties opposed the Order, arguing it represented federal overreach. The [Ninth Circuit Court of Appeals](#) upheld the Order in all but one respect (declining to mandate a "deemed granted" remedy for shot clock violations, while noting the FCC's framework significantly alleviated deployment barriers).

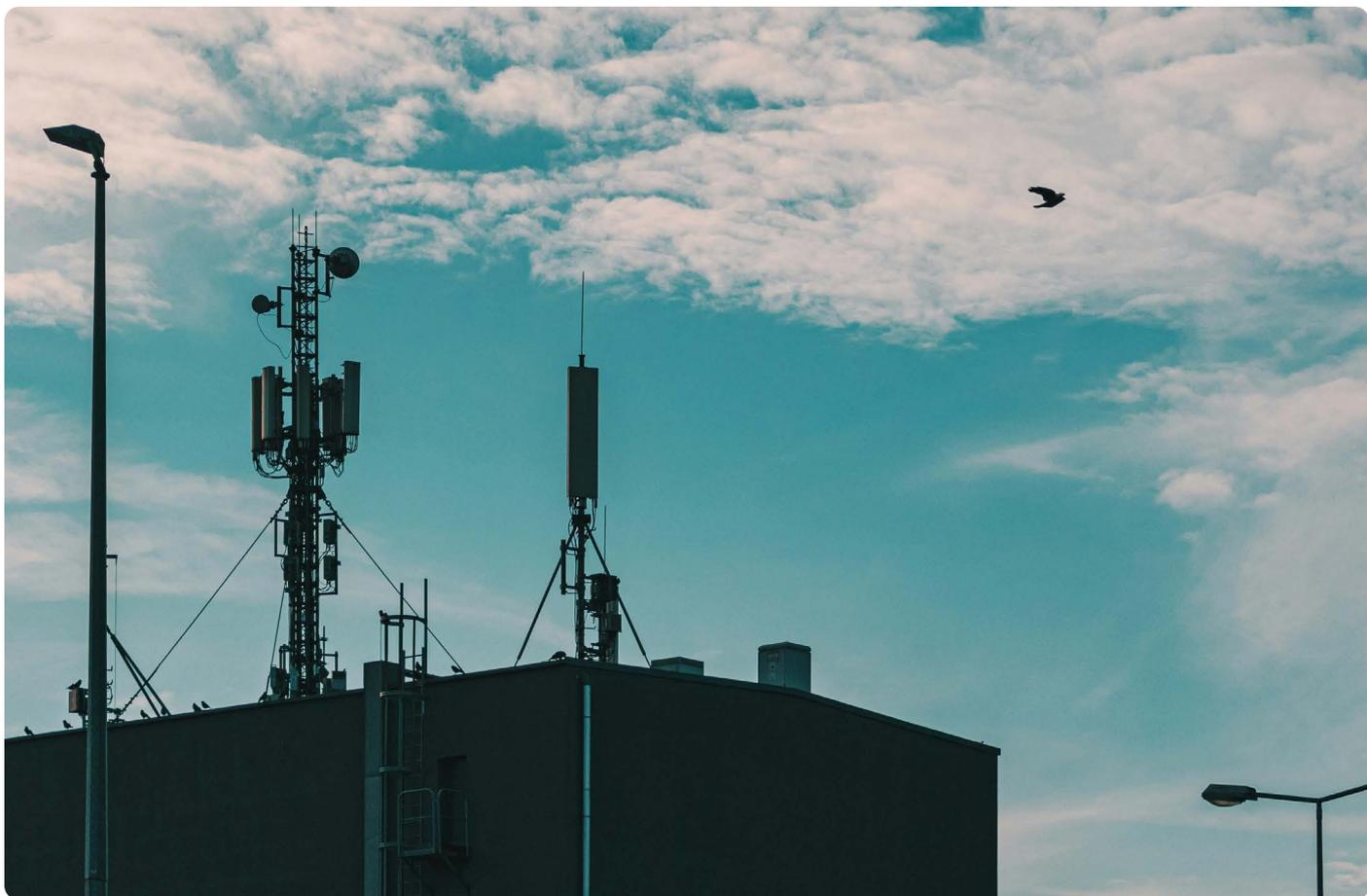
The US experience demonstrates that where a central government decides mobile infrastructure is a national priority, it possesses the tools to override local planning discretion and that doing so accelerates deployment. The UK does not need to replicate the FCC's confrontational pre-emption model, but the principles underlying the US approach, such as the binding timelines, cost-based fees, and limits on aesthetic objections for routine infrastructure, are directly applicable to the English planning system through the amendments proposed in this paper.

South Korea: Government-Led Coordination

South Korea launched the world's first nationwide 5G network in April 2019 and had deployed [115,000 base stations within the first year](#), which would be a mythical pace of rollout, unimaginable under the UK's current planning regime. The government's approach combined three elements that the UK lacks.

First, binding rollout milestones tied to spectrum licences: operators were required to build [22,500 base stations by end-2021, 45,000 by end-2023, and 150,000 at completion](#). This created a regulatory obligation to deploy, rather than merely a commercial incentive. Second, financial support and incentive structures: the government invested \$27 billion through its "[5G+ Strategy](#)" and offered tax breaks and spectrum fee reductions (including a recent commitment to reduce LTE reallocation fees by over 15 per cent if operators build more than 20,000 indoor 5G base stations). Third, strategic coordination between government, operators, and equipment manufacturers, including pre-designation of priority deployment areas and collective planning for densification.

The South Korean model is not directly transplantable to the UK, which relies on private investment rather than state-directed deployment. But the Korean experience illustrates the scale of what is achievable when regulatory barriers are low. South Korea's 5G network download speeds average 650 Mbps, roughly four times faster than 4G.



The Overriding Lessons to be Learned

The jurisdictions that lead on 5G deployment share a common feature: they have each concluded, through their own legislative and regulatory processes, that mobile infrastructure is too important to be left to the discretion of individual local planning authorities applying subjective aesthetic judgements on a case-by-case basis. It is also the case that small changes to planning processes, like those proposed in this paper, can lead to outsized benefits for local economies and communities. Germany has declared it to be in the “overriding public interest”, and Finland has imposed automatic approval through a centralised authority, which has also coincided with an overall shift towards higher speeds and interconnectivity.

The United States has pre-empted local control and imposed binding deadlines, which is now experienced as one of the most connected nations with hundreds of ‘Unicorn’ AI and data companies. Finally, South Korea has tied deployment obligations directly to spectrum rights, and it is widely seen as the global leader in digitisation and connectivity – for the avoidance of doubt, the purpose of the system is what it does, and where small, growth friendly changes can be made to our planning system, we will see outsized digital, social, and economic benefits.

The UK has been too slow to update, with its reforms, while welcome, cautious, incremental, and hedged with enough conditions and exceptions to preserve the very inconsistencies they were designed to address. As previously highlighted, this has caused immiseration,

lower productivity, and very little gained. GSMA notes that while the UK’s 5G adoption rate has exceeded 40 per cent, Europe as a whole “continues to lag behind other advanced regions such as North America, East Asia and the Gulf Cooperation Council states.” Planning reform is not the only factor in this gap, but it is one of the factors most directly within the government’s control, and one where the UK’s competitors have moved decisively while Westminster has consulted and prevaricated.

The reforms proposed in this paper do not ask the UK to replicate any single foreign model. They ask it to absorb the common lesson from all four: that the planning system’s current treatment of mobile infrastructure is a barrier to growth, and that targeted reform to Permitted Development Rights, delivered through secondary legislation, is the most effective and lowest-cost response. The government has already recognised this through its December 2025 Call for Evidence, which consulted on many of the PDR changes this paper supports. The international evidence reinforces the case for implementing those reforms decisively and, where the evidence warrants it, going further. These are not large programmes of primary legislation. They are relatively small and straightforward changes, requiring only secondary or non-legislative amendments that will require little parliamentary time. The costs for the government are low, yet the rewards to the country and economy will be large.

Country	Planning Regime for Mobile Infrastructure	Key Regulatory Reform (Date)	National Median Mobile DL Speed (Mbps, Nov 2025)	Global Mobile Speed Ranking (2025)	Leading City Mobile DL Speed (Mbps, Nov 2025)
United Kingdom	Three-tier system: notification, prior approval (56 days), full planning permission. Protected land restrictions. No statutory priority for telecoms.	GPDO Part 16 amendments (2022). Call for Evidence on further reform (Dec 2025–Feb 2026).	68.46	59th	Manchester: 113.67 London: 103.36
Germany	Länder-level approval procedures (16 states). Heritage and nature conservation protections. Historically fragmented.	TKG Amendment Act (June 2025): telecoms declared “overriding public interest” until 2030. Priority in all approval procedures.	~95*	~50th*	Berlin: ~120*
Finland	Centralised permit platform. “Silent approval”: automatic grant if no decision within 4 months. Maintenance exempt.	Gigabit Infrastructure Act implementation (2025). Silent approval mechanism. Centralised digital platform.	~110*	~38th*	Helsinki: ~140*
United States	FCC pre-empts state/local control. “Shot clocks”: 60 days (collocation), 90 days (new). Fees capped (\$500 initial, \$270/yr per small cell).	FCC Small Cell Order (Sept 2018). Upheld by Ninth Circuit (2020). Section 6409(a) streamlining (2020).	158.49	14th	New York: ~180 Chicago: ~175*
South Korea	Government-led coordination. Rollout milestones tied to spectrum licences. Tax breaks and fee reductions for infrastructure investment.	World’s first 5G launch (April 2019). 5G SA mandate (Dec 2025). \$27bn “5G+ Strategy” investment.	227.07	7th	Seoul: ~350 (avg reported by operators)
Global Median			93.47		

Table 2: International Comparison of Telecommunications Planning Regimes and Network Performance

Sources: Ookla Speedtest Global Index (November 2025 data) via ISPreview; GSMA Mobile Economy Europe 2025; FCC Small Cell Order (FCC 18-133); German TKG Amendment Act 2025 (Bundestag/Bundesrat); Finnish Gigabit Infrastructure Act implementation (Traficom); Samsung Networks / MSIT Korea. * Estimated from nearest available Ookla data or operator reports; city-level figures are median download speeds where available, operator-reported averages otherwise.

Section 4: A Systematic Assessment of Planning as a Barrier

This section presents the evidence base that underpins the case for the specific PDR reforms proposed in this paper and consulted upon in the government's [Call for Evidence](#). The planning system's shortcomings in relation to mobile infrastructure are not random, or solely experienced by the telecoms sector. They are structural, predictable, and with the right amendments to Permitted Development Rights and supporting policy, these are entirely fixable. This section catalogues the principal barriers and their consequences for deployment speed, cost, and coverage outcomes.

Inconsistent LPA Decision-Making

The prior approval process was designed to be a light-touch check on siting and appearance, and not an expensive and time-wasting second hearing on whether mobile infrastructure should exist. The value of the prior approval system is demonstrated by the experience of Northern Ireland, where no equivalent process exists. In Northern Ireland, telecoms work must either meet the strict dimensions for full permitted development or require full planning permission, with no intermediate route. The consequence has been significantly slower deployment and considerable difficulties in delivering the [Shared Rural Network programme](#), with investment diverted to other parts of the UK where planning timescales are more predictable. The lesson is not that prior approval is unnecessary, it is that the English system, while an improvement, needs the modest updates proposed in this paper to function as the light-touch process it was designed to be. In practice, however, LPAs vary enormously in how they interpret and apply Part 16.

A 2021 review by [BusinessLDN](#) found that London's 33 local authorities take "disparate approaches to urban design and planning policies," causing "significant inconsistencies for city-wide deployment of wireless infrastructure." Some LPAs treat prior approval applications with the same rigour as full planning applications, requiring alternative site assessments, detailed design statements, and community engagement far beyond what the legislation demands. Others apply the statutory test (siting and appearance) and determine applications within weeks.

This inconsistency creates three problems, which will be quickly explored. Firstly, operators cannot predict which LPAs will approve straightforward upgrades and which will refuse them, making it impossible to plan deployment schedules with confidence. Interviews conducted with major MNOs, in the course of this

research, found a number of examples wherein straightforward and otherwise replicable projects were frustrated depending on which LPA was contacted. Secondly, communities served by permissive LPAs enjoy better connectivity than those served by restrictive ones, for reasons entirely unrelated to local need or technical suitability. Of note, Manchester and Glasgow enjoy considerably higher connectivity, whereas London and Plymouth struggle along with more frustrations. Finally, where LPAs refuse applications that are subsequently overturned on appeal, they have achieved nothing except delay and political signalling, the mast is built in the same location, months later, at greater cost to the operator and the public purse (with the Planning Inspectorate being funded by the taxpayer).

One case-study presented to the researcher highlighted a very public area in Central London, which has been prevented from adding much-needed capacity and upgrades on three tall buildings, owing to a combination of Conservation Area rules for rooftops (despite the height of the buildings), the inadequacy of the NTQ regime, and has led to a rise in concern amongst the provider about inadequately serving customers. This is not a lone example, with one case-study highlighting a city-wide regress in connectivity owing to the same policies as above - this city is at the centre of various UK growth strategies and academic prowess.

The Appeal Bottleneck

Where prior approval or planning permission is refused, operators may appeal to the Planning Inspectorate. Research by [Planning magazine](#) found that Mobile Broadband Network Ltd (MBNL), a joint venture between EE and Three, alone lodged 51 telecoms-related appeals between 2017 and 2020, with a success rate of ~80 per cent at that time. Planning consultancies specialising in telecoms report managing over 70 appeals at a time, with success rates described as "well above average for planning appeals in England."

The government's own Call for Evidence acknowledged that "industry reports a significant proportion of prior-approval applications are refused" and that "a large share of appeals get overturned by the Planning Inspectorate." This cycle of refusal, appeal, overturn can extend deployment of a single site by up to 12 months and add material cost (estimated by operators at £2,000-£2,500 per prior approval application in administrative costs alone, before appeal costs are factored in).

The downstream consequences are, of course, significant. During the appeal period, the community served by the proposed site receives no improved coverage. The operator's capital is tied up in planning limbo rather than being deployed productively. And the Planning Inspectorate is burdened with a caseload of appeals that, in many instances, confirm what the statutory framework already established: the principle of mobile infrastructure development is not in question.

It should be noted that given the multi-hundred million pound size of the investment programmes by major MNOs, an appeal can be too consuming of resources to carry through. Instead of appealing, upgrading, and installing higher connectivity through new cells and masts for the benefit of communities, businesses, and public services, planning committees can shift investment away from the constituents they serve.

Connectivity in Conservation Areas

Conservation Areas serve an important purpose in preserving architectural and historic character, and this paper does not propose any change to their status or designation. The concern, rather, is that the current planning restrictions within these areas risk locking out the communities, businesses, and visitors within them from the connectivity that the rest of the country increasingly takes for granted. The overlap between Conservation Areas and high-demand urban areas creates a structural barrier to connectivity that is particularly acute in London. Conservation Area designation triggers automatic restrictions on mast upgrades under Part 16, pushing operators from the notification tier into prior approval or full planning permission.

Conservation Areas were designated to protect architectural and historic character, whereas mobile infrastructure, particularly rooftop installations, has minimal to zero impact on the street-level experience that Conservation Area designation is designed to protect. As Create Streets has noted, it is "only the concern of birds for what appears on a roof." HVAC systems, satellite dishes, and building services equipment proliferate on rooftops across London's Conservation Areas without comparable planning restriction. Yet a telecoms antenna on the same rooftop faces a planning process designed for ground-level development visible to pedestrians.

The Alternative Site Assessment Burden

Current NPPF guidance (paragraph 122(c)) requires applicants for new masts to provide "evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure." This alternative site assessment is applied not only to genuinely new sites but, in practice by some LPAs, to upgrades of existing sites where the principle of development has already been established and accepted.

The result is a documentation burden that adds cost and time to applications that should, in principle, be straightforward. An operator upgrading an existing mast with additional 5G equipment should not need to demonstrate that it has explored alternative locations for equipment that is, by definition, being installed on an

already-consented site. Removing the alternative site assessment requirement for upgrades to existing masts is a straightforward PDR reform, deliverable through an amendment to NPPF paragraph 122(c). It was not included in the government's Call for Evidence, but this paper argues it should form part of the package of reforms taken forward.

Removing this requirement for upgrades to existing sites would not only reduce cost and delay for operators, but would also relieve local planning authorities of the burden of assessing documentation that serves no practical planning purpose. In a period when LPA resources are stretched and housing delivery is the government's stated priority, it is difficult to justify requiring planning officers to evaluate alternative site assessments for equipment being installed on masts that already have planning consent.

The NTQ Coverage Gap

Industry reports that NTQs are an increasing source of coverage loss, as landowners, particularly those undertaking redevelopment, exercise their right to request the removal of masts from their land. The current 18-month emergency deployment window assumes that an operator can, within that period: identify a suitable replacement site; negotiate a voluntary agreement with the new landowner (or apply to the Upper Tribunal for an imposed agreement); submit and obtain planning approval (56 days for prior approval, longer for full planning, and potentially 12 months if appealed); and physically construct and commission the new site. In practice, this timeline is frequently unachievable, and thus, divorced from reality.

The government's Call for Evidence acknowledged that "this has resulted in a sizable number of temporary sites ultimately being lost when the window expired before the permanent site was live." Each lost site represents a low coverage area, which is contra-government policy, and more seriously affects emergency service communications, business operations, and the daily connectivity on which communities depend.

In order to remedy the frustrations of the NTQ regime experienced by local communities, the government may simply remedy it by extending the notice period to between 36 to 48 months. The negative externalities of the current regime are all too clear to residents affected in those areas, whilst it is entirely reasonable for landowners to give this notification with enough time - rarely do events move quickly in development.

Yet new buildings are simultaneously being designed with materials that actively degrade the wireless signals that infrastructure delivers. Modern energy-efficient construction, which primarily consist of metallic-coated Low-E glazing, dense reinforced concrete, and foil-backed insulation, can reduce indoor mobile signal strength by 20–30 dB, cutting usable signal range by up to 75 per cent. As 5G migrates to higher-frequency bands (3.5 GHz and above), the problem intensifies: heavy concrete that causes 23 dB of loss at 2.4 GHz causes approximately 45 dB at 5 GHz. The Building Regulations are working at cross-purposes, with Part L drives developers towards thermally efficient envelopes that are increasingly opaque to the wireless connectivity Part R is intended to promote.

The developer's responsibility for wireless connectivity does not end with the existing infrastructure their scheme displaces. It extends to the buildings they construct. The NTQ problem, as explored above, addresses the loss of existing coverage when infrastructure is removed; the Wireless Connectivity Impact Assessment, proposed below, addresses the degradation of coverage caused by new construction itself. Both are manifestations of the same underlying failure: a planning system that treats wireless connectivity as an afterthought rather than essential infrastructure. Just as developers are encouraged to consider the impact of their schemes on existing wireless infrastructure, they should also be encouraged to assess and disclose how their buildings' materials and design will affect the wireless signals that serve their occupants and neighbours. Again, this is a small change, a desktop exercise conducted during the design stage, using floor plans and materials specifications the developer should already possess, but one which, as with so many of the reforms in this paper, costs almost nothing and yields significant benefits for the communities who will live and work in these new developments.

The Building Regulations 2010 should be amended, using existing powers in the Building Act 1984, the same mechanism used to introduce Part R, to encourage developers to submit a Wireless Connectivity Impact Assessment (WCIA) as part of their building control applications. The WCIA would model, using industry-standard RF prediction software, how a building's materials and design affect wireless signal penetration. It would cover external mobile (4G/5G) reception and internal Wi-Fi performance across 2.4, 3.5, and 5 GHz bands.

The requirement would apply to residential developments of ten or more dwellings, commercial buildings above 1,000 sqm, and all public buildings (healthcare and education). Smaller schemes would be exempt on proportionality grounds. Major renovations involving envelope changes (glazing or cladding replacement) would also be captured.

Critically, the WCIA would be an assess-and-disclose requirement, rather than a performance standard with developers not required to achieve any particular indoor signal level. The analogy is with Energy Performance Certificates or acoustic impact assessments: demonstrate consideration of the issue, rather than elimination. Where significant wireless dead zones are identified, the developer would set out any mitigation considered, RF-transparent glazing, signal repeaters, distributed antenna systems, or layout changes, but would not be compelled to implement them. The developer should be connected to an MNO or wireless providers via the Digital Champion in an LPA, for further wireless infrastructure concerns surrounding a new development.

A complementary amendment to NPPF paragraph 120 would establish wireless connectivity impact as a material planning consideration for major developments, reinforcing the Building Regulations requirement and giving LPAs an explicit mandate to consider this issue.

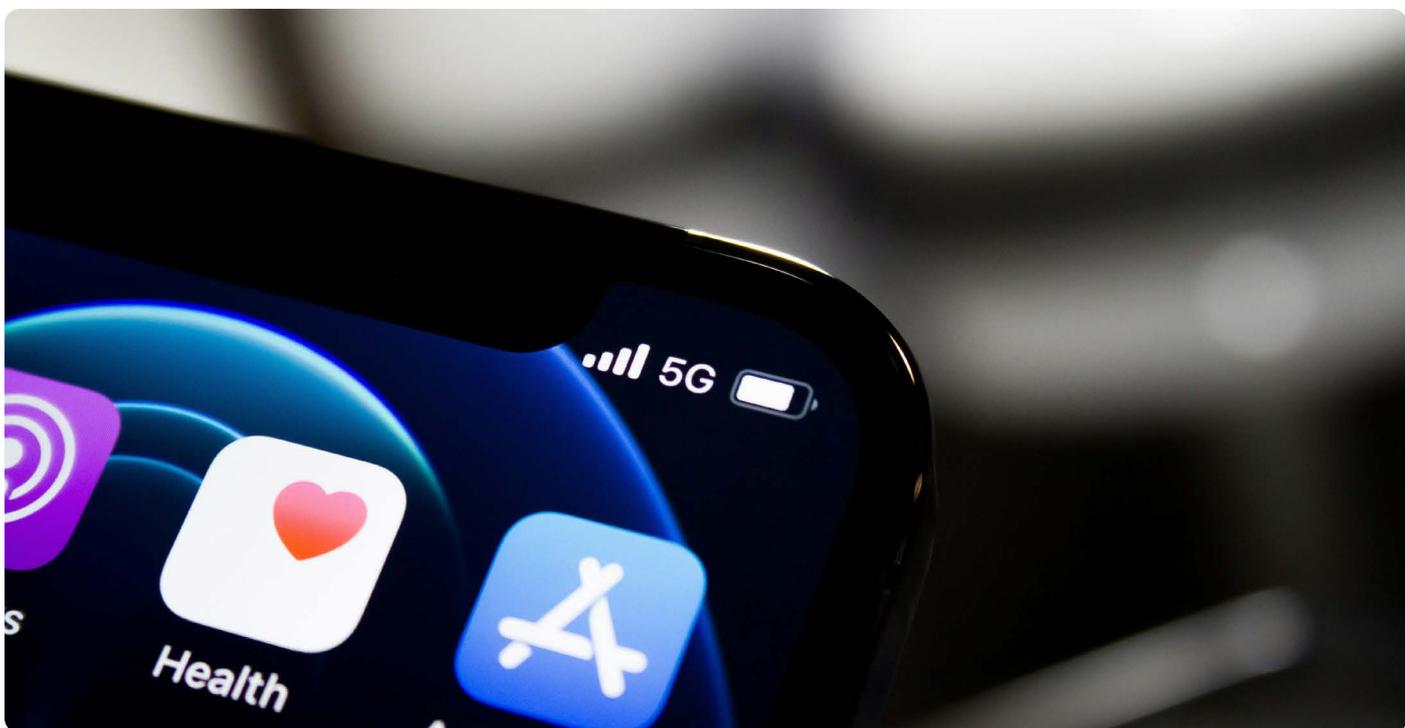
The WCIA is a desktop exercise conducted during design, using floor plans and materials specifications the developer should already possess. It requires no physical site visits or post-construction testing, and does not require integration into the Building Safety regimen. Based on current UK radiofrequency consultancy rates, the costs would be as follows:

Development Size	WCIA Cost	Per Dwelling	% of Build
Small (10–50 units)	£1,500 – £5,000	£51,000	< 0.1%
Medium (50–200 units)	£5,000 – £15,000	£25 – £100	< 0.05%
Large commercial (5,000+ sqm)	£10,000 – £30,000	N/A	< 0.05%

Figure 3: Estimated Cost of WCIA Survey by dwelling and % of Build cost

This issue is, in effect, one of reverse sensitivity: new developments are being designed and approved in a manner that degrades the performance of existing wireless infrastructure, without any requirement to assess or disclose that impact. The concept is well established in planning policy for other forms of infrastructure, new housing near existing industrial sites, for example, must consider the impact of noise and emissions on future residents. The same principle should apply to wireless connectivity. Where a new building's materials and design will significantly attenuate the wireless signals that serve the surrounding area, the developer should be encouraged to assess and disclose that impact as part of the planning process. The Wireless Connectivity Impact Assessment proposed above applies this principle in a proportionate, low-cost manner that is consistent with the approach already taken for broadband under Part R of the Building Regulations.

The existing Part R connectivity plan template (Appendix B of Approved Document R) could simply be extended to include a WCIA section. Enforcement would sit with building control bodies using the same proportionate machinery already in place for broadband requirements. The requirement is technology-neutral, specifying methodology rather than materials, and would adapt to future construction techniques and wireless standards without further legislative change.



Conclusion

The gap between the connectivity the UK needs and the connectivity it has is not a gap of technology, ambition, or capital. The telecoms industry has pledged billions in investment by the end of the decade. It absorbed roughly £2bn in costs from the Huawei removal programme without passing the burden to consumers. Real-terms mobile prices have fallen year after year, reflecting a highly competitive market that consistently delivers value to consumers. This is an industry that has demonstrated, repeatedly, that it is a reliable and responsive partner to the government and its customers. What it cannot do is invest through a planning system that treats routine mast upgrades as though they were contentious new developments, even when planning permission has been proved in order to install the original infrastructure.

The evidence assembled in this paper points to a single, consistent conclusion: reforms to Permitted Development Rights under Part 16 of the GPDO are the most direct, lowest-cost route to unlocking the connectivity that communities and businesses across the UK need. 95% of the build programme involves upgrading existing infrastructure within the existing footprint, and it is the PDR framework that governs whether those upgrades can proceed efficiently or are delayed by disproportionate planning processes. The specific reforms are straightforward: relaxing the antenna cap on protected land so that rooftop installations can accommodate modern 5G equipment; increasing height and width thresholds to reflect the physical requirements of current technology and to enable the mast-sharing that government policy encourages; permitting ground-based monopoles up to 20 metres under notification rather than prior approval; and removing the alternative site assessment burden for upgrades to masts that already have planning consent.

These are changes to secondary legislation that require no primary legislation, no new public expenditure, and minimal parliamentary time. The government's [December 2025 Call for Evidence](#) recognised many of these barriers and consulted on reforms that address several of them. This paper welcomes that initiative, supports the direction of travel, and in areas such as width thresholds and the treatment of existing consented sites, argues that the proposals should go further.

These reforms would also deliver a tangible benefit to local authorities themselves. Every telecom application that is simplified or moved from prior approval to notification is an application that no longer requires planning officer time, committee consideration, or appeal management. At a time when planning departments are under pressure to deliver on housing and wider infrastructure, freeing up these resources is a benefit in its own right.

Equally important is ensuring that the planning system stops creating the NTQ problem in the first place. At present, a developer can proceed with a major redevelopment that displaces mobile infrastructure serving thousands of residents without any expectation to consider its presence, assess the impact on local coverage, or engage with the affected operator. The reforms in this paper would change that, through recommended disclosures, relocation provisions that LPAs are encouraged to apply, and connectivity as a material planning consideration. These are not onerous new burdens on the development industry. A developer who demolishes a building hosting a mast should bear the same responsibility for considering that connectivity as they would for considering a listed building or a heritage asset. The planning system currently asks less



of developers for wireless infrastructure than for almost any other form of essential service, and communities are paying the price.

The international evidence is unambiguous. Every jurisdiction that leads the UK on connectivity metrics has reached the same diagnosis and acted on it. None of these countries regret those decisions, with nations such as South Korea boasting about their connectivity and planning ahead for 6G. The lesson we can learn is that small, decisive changes to planning rules, rather than large programmes of primary legislation, rather than new public spending nor wholesale deregulation, produce outsized improvements in coverage, speed, and private investment.

The reforms set out in the Technical Annex are targeted amendments to the GPDO, the Town and Country Planning Act, and the National Planning Policy Framework. They gently bring up to date permitted development rights so that operators can upgrade masts and deploy rooftop infrastructure without disproportionate planning processes, in order for masts to serve a rapidly modernising customer base. They extend the NTQ emergency window so that displaced infrastructure can be replaced before communities lose signal. They give digital connectivity the policy weight it deserves in planning decisions, and they

introduce a modest disclosure requirement so that new buildings are no longer designed in ignorance of their impact on wireless reception. Every one of these changes can be delivered through secondary legislation or policy revision, and none of which requires new public expenditure. Together, they would remove the planning barriers that stand between billions of pounds in committed private investment and the communities, businesses, and public services that investment is intended to serve.

The cost of these reforms is negligible but the cost of continued inaction is not. Every month the planning system remains unchanged is a month in which operators redirect investment away from the communities that need it most, coverage blackouts multiply, and the UK falls further behind nations that have already made these small, cost-free changes and are reaping the rewards. The government has stated its commitment to growth, to digital infrastructure, and to planning liberalisation. The reforms in this paper are the practical expression of those commitments and they ask only that the planning system stop frustrating the investment the telecoms industry is already willing to make.

Technical Annex: Legislative and Policy Amendments

I. Amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015

1. Reduced Restriction on Rooftop Deployment in Protected Areas

- Amendment of antenna restrictions (Class A, Part 16):
 - ⊙ In Class A of Part 16, sub-paragraph (a) will be amended to remove the numerical limitation on the installation of antennas and dishes on a building.
- Amendment of poles for antennas (Class A, Part 16):
 - ⊙ For the purposes of this Part, a pole for the support of antennas installed on the rooftop of a building, not exceeding 6 metres in height, will not be treated as a mast and is deemed permitted development.
- Clarification of 'differ' (Class A, Part 16):
 - ⊙ In the condition that a replacement antenna must not "differ" from the antenna being replaced, "differ" means any replacement antenna that exceeds the dimensions of the existing antenna by more than one metre in any direction, or where the antenna and its support pole is moved by more than one metre from the existing position.

2. Reduced Restriction on Mast Alteration of Width Rules

- Amendment of width allowance (Class A, Part 16):
 - ⊙ In Class A, the restriction on the permitted increase in the width of a mast will be replaced with a standard allowance of 66 per cent of the original width or 2 metres, whichever is the greater.
- Amendment of 'original width' definition:
 - ⊙ The definition of the 'original width' of the mast will be amended to include the width of any replacement mast installed following a Notification under the Electronic Communications Code (Conditions and Restrictions) Regulations 2003.

3. Allow upgrades to 30m on unprotected and 25m on protected land/non-highway without prior approval

- Amendment of height limits (Class A, Part 16):
 - ⊙ For Class A development on unprotected/non-highway land, the maximum height will be increased from 25 metres to 30 metres.
 - ⊙ For Class A development on protected land/highway, the maximum height will be increased from 20 metres to 25 metres.

4. Addition of up to 20m monopoles outside protected areas as permitted development not requiring prior approval

- New permitted development right (Class A, Part 16):
 - ⊙ A new sub-class will be inserted into Class A to permit the installation of a ground-based monopole, not exceeding 20 metres in height, outside of a protected area, without the requirement for prior approval.

5. Clarification on the upgrade/replacement of masts so that they do not need to be built on the existing footprint

- New condition on replacement masts (Class A, Part 16):
 - ⊙ A new condition will be inserted into Class A: *"(2) Class A(a) development consisting of the replacement of an existing mast is permitted subject to the condition that the mast will be installed as close as reasonably practicable to the mast which it is replacing."*

6. An extension of emergency temporary deployment periods from 18 months to 36 months

- Amendment of temporary period (Class A, Part 16):
 - ⊙ For the temporary emergency deployment period following a Notice to Quit (NTQ), substitute 36 months for 18 months.

II. Amendments to the Town & Country Planning Act 1990

1. Mandatory Declaration of Impact

- Insertion of new requirement:
 - ⊙ A new section will be inserted requiring that an application for full planning permission, in a manner analogous to a requirement for a protected species or listed building declaration, will include a mandatory declaration of the presence of any telecommunications infrastructure on the application site.

2. Enhanced Planning Conditions

- Insertion of new power for Local Planning Authorities (LPAs):
 - ⊙ A new provision will be inserted into the Act to empower Local Planning Authorities to impose a specific, enforceable condition on any grant of planning consent affecting telecommunications infrastructure (referred to as the “Relocation & Resiting Clause”). The condition will stipulate that:
 - ▢ *The development cannot commence until a reasonable, agreed-upon period (e.g., 12 months) has elapsed to allow for the telecommunications provider to conduct a comprehensive search and formal relocation plan for the affected infrastructure.*

III. Amendments to the National Planning Policy Framework (NPPF)

1. Strengthening weighting towards the socio and economic benefits of digital connectivity

- Suggested Amendment to Section 10:
 - ⊙ *“Local planning authorities should support the expansion of electronic communications networks, including 5G, by giving significant weight to the economic and social benefits of digital connectivity and broadband, including those arising from new applications and services.”*

2. Amend focus on camouflage in paragraph 120 to ‘where technically feasible’

- Suggested Amendment to Paragraph 120:
 - ⊙ *“...Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where technically feasible.”*

3. Greater support for NTQ replacements by amending Paragraph 121b to provide a more positive approach

- Suggested Amendment to Paragraph 121b:
 - ⊙ *“121...(b) they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communications services and have also considered the potential to amend the design of developments to retain connectivity infrastructure that would otherwise result in the loss of services to local communities. In circumstances where the loss of connectivity infrastructure is an unavoidable consequence of development, they should attach significant weight to the retention of these services at a replacement site nearby.”*

4. Clearer guidance to remove the requirement for an alternative site assessment for upgrades to existing sites

- Suggested Amendment to Paragraph 122(c):
 - ⊙ *“122...(c) for a new mast or base station only, evidence that the applicant has explored the possibility of erecting antennas on an existing building, mast or other structure and a statement that self certifies that, when operational, International Commission guidelines will be met. There is no requirement for an applicant to provide information on alternative locations for the development when applying to upgrade existing masts or base station infrastructure.”*



SMALL CHANGES, BIG REWARDS

Ensuring planning connects with
mobile infrastructure ambitions



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