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T: 020 8607 2500

E: [info@westlondon.com](mailto:info@westlondon.com)

Twitter: @westlbusiness

New Build Development connectivity consultation  
Digital Infrastructure Directorate  
Department for Digital, Culture, Media and Sport  
100 Parliament Street  
Westminster  
London SW1A 2BQ  
[newbuildconnectivity2018@culture.gov.uk](mailto:newbuildconnectivity2018@culture.gov.uk)

20 December 2018

Dear Sir/ Madam,

**Response to Consultation: New Build Developments – Delivering Gigabit Capable Connections**

West London Business (WLB) is a business-led non-profit established in 1994 with a board including firms such as PwC, Fullers, Kingston Smith LLP, Brunel University London, micro enterprises – and Heathrow. Our mission is to ensure that West London remains the best place to do business. West London is an amazing sub-region: it's a £50bn economy and the second largest economic powerhouse in the UK. Our members work together to raise West London's global economic competitiveness, whilst pursuing social and environmental sustainability.

**1. Do you have any further evidence on the state of New Build Development connectivity in the UK?**

In north-west London we receive ongoing feedback regarding poor digital infrastructure in new build (resi and commercial). In recent years we have worked extensively in Park Royal – the UK's largest industrial estate; also probably the UK's largest business broadband not spot. This has resulted in Openreach investing in a pilot FTTP installation reaching 500 out of 2000 businesses this Autumn.

We support the idea that the industry should work on a new set of standards that new-build developers, planners and building controllers can use to ensure the correct infrastructure is being installed into new properties.

**2. Do you have any information or evidence to suggest that the costs developers would incur under the proposed policy would prevent homes being built?**

We believe that the private investment into full fibre that the Government's policies have encouraged means that most developers will be able to find Communication Providers that will cover any additional costs developers incur in installing full Fibre to the Home/ Premise (FTTH/P) connectivity from their development boundary and into their new build properties.

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Where further intervention may be required is for the fibre backhaul from the development boundary to the nearest national fibre interconnect point. This is more likely for a smaller more rural development and is also an issue on industrial estates (where the investment challenge is similar to rural areas).

This is where the Government's outside-in approach to public subsidy could be used to fund the installation of an open duct from the development boundary to the nearest fibre network. This public duct would then be available for all Communication Providers to use to install their own fibre cables.

- 3. We propose that developers would be obliged to provide a simple connectivity plan for their developments to LAs. This plan would demonstrate that developers had consulted with at least two network providers to provide gigabit-capable networks and inform LAs when a site is connected. Do you have any comments on this proposal for a connectivity plan?**

We believe that developers, local authority departments and Communication Providers require more detailed guidance on what should be included in an acceptable connectivity plan. This definition for a connectivity plan should be included in the work proposed by the Independent Networks Cooperative Association (INCA) for the development of a new set of standards.

To ensure future-proofed infrastructure is installed, we would also strongly recommend that developers are required to install full-fibre gigabit-capable networks, rather than gigabit-capable. This will ensure that no copper cabling is installed.

- 4. a) Do you agree with the assumption that deploying the necessary infrastructure to deliver gigabit-capable networks is best achieved when the site is being built?**

Yes. Building the infrastructure retrospectively would be costlier.

**(b) What technical specifications should the physical infrastructure (ducts etc.) have?**

We would expect detailed technical specifications to be defined as part of the new standard development as proposed by INCA. However the physical infrastructure installed should be capable of accommodating multiple Communication Providers installing their fibre to every property unit both during the build and also subsequently.

**(c) Do you agree that developers should deploy, and pay for, the necessary infrastructure from the in-building connections to the boundary edge of the development?**

Yes, however, we believe that most developers might be able to find Communication Providers who are willing to contribute towards their reasonable costs of installing this infrastructure in the current market.

- 5. (a) Do you agree that developers should have to engage with at least two network operators who can provide gigabit-capable connections to the development?**

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Yes - It would be useful if there was a central register of operators, including contact details, that developers could access to make it easier for them to obtain proposals from a sufficient number of developers.

**(b) What further measures could we consider to promote the availability of networks from multiple providers at an early stage to minimise costs and disruption?**

As previously mentioned the main barrier preventing multiple providers connecting to a new development site will be the cost of the backhaul duct. We support the recommendation of one of our partners, Community Fibre, that the entity who can install a communal backhaul duct from a remote development site to the nearest existing fibre interconnect point would be the Local Authority who are also the Highways Authority. Going forward public subsidy should be focused on installing these communal ducts where required.

**6. Taking £3,000 as a suggested aggregated cost cap per premise, do you agree with the proposed how should costs be divided between developer and operator?**

Having discussed this with one of our partners, Community Fibre, it seems that if the variable of the backhaul duct cost can be removed from the equation, then the cost of connectivity from the site boundary to each individual property is likely to be far less than £3,000 per property. We believe that developers will be able to find operators, in the current competitive market, that will be prepared to cover the full cost of this installation.

**7. What information and evidence can you provide to help refine the 'in scope sites' policy design choice - aggregated cost cap or number of premises?**

We believe that the costs associated with installing infrastructure between the development site boundary and each individual property unit for a full FTTH/P solution is similar irrespective of the number of units, in other words the aggregated cost per unit for this part of the installation will be similar irrespective of the number of units.

The key variable is the cost of the backhaul duct from the site boundary to the nearest fibre interconnect point which in some cases will be a few meters and in others will be many kilometers. If Government wants to encourage development in an area then it should provide public subsidy to construct this backhaul duct. Ultimately it is the developer's decision on where to locate their development. As such the developer should incur the costs of installing this backhaul duct where no public subsidy is available.

**8. (a) Do you agree that developers should have the overall responsibility to ensure Gigabit connectivity for their developments (allowing for the fact that developers can oblige operators to connect using the 'duty to connect' provision)?**

Yes, however new standards need to be developed so that developers understand exactly what their obligations are. The new standard should include the developer's obligation to install the necessary backhaul passive infrastructure that FTTH/P Communication Providers can use. They would only be able to enforce their 'duty to connect' once this backhaul infrastructure is in place.

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**(b) How would this policy affect small housebuilders?**

These proposals would have no greater impact on small housebuilders than large housebuilders. The key variable would be in where the developer chose to locate their development. Developments close to existing fibre-optic interconnections would incur less costs whereas those located further away would incur higher costs. It may be appropriate for small housebuilders to receive public subsidy through the Government's proposed outside-in approach to public subsidy for full fibre infrastructure.

**9. Do you have any comments on the proposed legislative approach? Do you have an alternative solution that would deliver gigabit-capable connections to NBDs?**

It may be possible to incorporate the proposed new technical standard within Part R of the Building Regulations.

Please do not hesitate to contact us directly if we can expand on any of the points above.

Yours sincerely,



**Andrew Dakers**  
Chief Executive



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