

CONSULTATION FORM

Draft Planning Policy Wales: Edition 10

This consultation seeks your views on the Welsh Government's proposed revision to Planning Policy Wales in light of the Well-being of Future Generations (Wales) Act 2015.

Fundamentally, PPW has been restructured into policy themes around the well-being goals and policy updated where necessary to reflect new Welsh Government strategies and policies.

If you have any queries on this consultation, please email: planconsultations-c@gov.wales or telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128.

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.
If you do not want your name and address to be shown on any documents we produce please indicate here

If you do not want your response to be shown in any document we produce please indicate here

CONSULTATION FORM

Draft Planning Policy Wales: Edition 10		
Date:		
Name	Hamish MacLeod	
Organisation	Mobile UK	
Address	1 Carnegie Road, Newbury, RG14 5DT	
E-mail address	hm@mobileuk.org	
Telephone		
Type <i>(please select one from the following)</i>	Businesses	<input type="checkbox"/>
	Local Planning Authority	<input type="checkbox"/>
	Government Agency/Other Public Sector	<input type="checkbox"/>
	Professional Bodies/Interest Groups	<input checked="" type="checkbox"/>
	Voluntary sector (community groups, volunteers, self help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	Do you agree planning policy topics be clustered around themes which show their relationships with each other and the 7 well-being goals? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

About Mobile UK

Mobile UK is the trade association for the UK's mobile network operators - EE, O2, Three and Vodafone. As mobile increasingly becomes the device of choice for running daily life both at home and at work, customers seek improvements to coverage, more capacity and greater capabilities. Our goal is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK as a whole.

Our role is to identify the barriers to progress, seek solutions and work with all relevant parties to bring about change, be they Government, regulators, industry, consumers or citizens more generally.

Mobile UK welcomes the opportunity to submit a response to the Welsh Government's consultation on Planning Policy Wales: Edition 10.

The planning policy framework is extremely important to the mobile industry; it provides vital context and guidance against which local planning authorities take decisions on operators' proposals for new sites (and alterations to existing sites).

People rely more and more on mobile connectivity and needs to be treated with every bit as much importance as other forms of digital connectivity. PPW must give a clear policy steer that will lend significant weight to positive planning determinations, including sensitive areas (of which there are many in Wales), given how mobile services will help Wales to achieve the Future Well-Being Act goals.

Mobile UK has only made responses to those questions where it has comments.

Q1 Do you agree planning policy topics be clustered around themes which show their relationships with each other and the 7 well-being goals? If not, please explain why

Mobile UK is supportive of the approach to structuring the planning policy around the well-being goals. We also note that mobile connectivity contributes to all the goals both directly and indirectly, either through the economic and social activity that we enable or through the mobile applications that are being increasingly adopted (for example from mobile based applications that consumers

use to manage their energy consumption to business applications the public sector uses to monitor flood risk).

It is a positive that the Telecommunications section is now set within a wider context of ‘productive and enterprising’ places, although it would also be helpful to recognise in some way the broader role mobile connectivity can play in making ‘sustainable places’ and ‘active and social’ places.

Q2	Do you agree the introduction provides an adequate overview of the planning system in Wales and appropriate context? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

Q2 Do you the introduction provides an adequate overview of the planning system in Wales and appropriate context? If not, please explain why

Yes.

The Mobile Action Plan for Wales makes clear how mobile connectivity is important to securing the goals of the Future Well-Being Act.

“The Welsh Government programme for government, Taking Wales Forward, sets out four cross-cutting strategies. Mobile connectivity not only directly supports the United and Connected theme through connecting people and communities but also supports the other three themes by enabling business connectivity, the delivery of public services and learning opportunities. Access to a usable mobile phone signal also supports all of the Well-Being of Future Generations Act goals.”

On a point of detail, Mobile UK would like to suggest that at Para 1.35 some language (such as that found within the National Planning Policy Framework for England [NPPF]) would be helpful to emphasise the importance of pro-active pre-application and mid-determination engagement between LPA and developer. The wording of Paragraph 187 in the NPPF is particularly good at outlining what is expected by both developer and LPA:-

“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”

Other Paragraphs in the NPPF between 188-195 continue to outline the positive engagement expected between operator and LPA. This could be addressed from paragraphs 1.35 in the PPW draft.

Q3	Do you agree with the Planning Principles? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q4	Do you agree with the definition of what is a ‘Sustainable Place’? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

No comments

Q5	Do you agree with high-level planning outcomes highlighted by People and Places: The National Placemaking Outcomes? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

Q5 Do you agree with high-level planning outcomes highlighted by People and Places: The National Placemaking Outcomes? If not, please explain why

Mobile UK broadly agrees with the planning outcomes highlighted in People and Places. On a point of detail, on Page 20, against the section ‘promotes a variety of activity, prosperity for all and makes it easier to communicate by digital means, we would expect to see more columns checked – specifically resilient, healthier and globally responsible.

As set out in paragraph 3.7, Resilience is about having well connected infrastructure and facilities. Such infrastructure **includes** digital infrastructure. Moreover, many mobile applications have a role to play in environmental monitoring (levels of pollution, flood risk, traffic management). Mobile connectivity is not just about people communicating; it will increasingly involve connected ‘things’ too. The number across the UK is already at 7m devices. This is set to rise rapidly the smart meter and the connected car markets develop.

Q6	Do you agree with the search sequence outlined for the formulation of development plan strategies? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q7	Do you agree with our revised policy approach for the promotion of new settlements and urban extensions If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q8	Do you agree with our revised policy approach to the preference for the re-use of previously developed land? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q9	Do you agree with our revised policy approach for the designation of Green Belts and Green Wedges? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
Q9 Do you agree with our revised policy approach for the designation of Green Belts and Green Wedges? If not, please explain why		
Telecommunications infrastructure development is often required within the green belt, given rural, open, areas still need service and the Government expects the whole landmass of the county to be covered with efficient mobile connectivity.		
The principle of a green belt or green wedge is to curtail the spread of built form and maintain 'openness' but telecommunications infrastructure does not harm the principles of a green belt/green wedge.		

Green belt policy should make sure that it makes clear that appropriately sited and designed telecoms infrastructure is not inappropriate green belt development, so that people living in, working in or travelling through such areas can benefit from connectivity and continuous coverage can be maintained, where necessary. This would be in addition to the criteria listed at 2.78 such as “justified rural enterprise needs”. It is often more than enterprise issues that dictate a need for connectivity – social elements like connectivity to emergency services also apply.

Furthermore, given the principle of the development in green belt is established under permitted development rights, policy should make clear that for applications for prior approval in the green belt the principle of the development should not be questioned.

Q10	Do you agree with the issues and inter-linkages highlighted in the introduction to the Active and Social Places chapter? What other issues and linkages could be identified to support this theme?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q11	Do you agree that it is important for viability to be assessed at the outset of the plan preparation process and for this to be supported by an enhanced role for housing trajectories? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

Q11 Do you agree that it is important for viability to be assessed at the outset of the plan preparation process and for this to be supported by an enhanced role for housing trajectories? If not, please explain why.

On a point of detail, the social trends should include the strong growth in Home Working, with numbers now in excess of 13% of the total workforce¹.

With pressure on the cost of office space, strong demand from the workforce to do more home working, better connectivity and changing attitudes to and the nature of work, Mobile UK would expect growth in home working to continue; this has implications for the aggregate amount of office development needed, demand on transport infrastructure and possibly even the types of dwellings in high demand.

Furthermore, strategic planning policy must reflect how modern mobile telecommunications service is vital to the overall sustainability of designated areas and development proposals, and how large designations and developments can impact upon existing mobile networks – this is something that should be given proper weight to in plan making.

We suggest that a paragraph that relates to the digital mobile infrastructure necessary to support local plan and strategic designations. For example, even medium scale employment, commercial or housing plan designations will create a population influx which will create a coverage and capacity demand – something the existing network infrastructure will not be able to cope with. In writing local and strategic policy, and land designations within development plans, plan writers and decision makers should holistically and strategically consider the need for communications infrastructure provision to sustain designation/development proposals and how this is going to be delivered.

1

<http://webarchive.nationalarchives.gov.uk/20160105210705/http://www.ons.gov.uk/ons/rel/lmac/characteristics-of-home-workers/2014/sty-home-workers.html>

--

Q12	Do you agree that it is important for a flexibility allowance to be included as a policy requirement in order to facilitate the delivery of planned housing requirements? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q13	Do you agree that to deliver the new housing Wales needs it is necessary for local planning authorities to allocate a range of site sizes, including small sites, to provide opportunities for all types of house builder to contribute to the delivery of the proposed housing? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		

No comments

Q14	To ensure that small sites are allocated, should there be a requirement for a specific percentage (e.g. 20%) of sites to be small sites? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

No comments

Q15	Do you agree that the custom and self-build sector can play an important role in housing delivery, in particular when linked to the use of Local Development Orders and design codes? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

Disagree	
Further comments	
No comments	

Q18	Do you agree that giving greater emphasis to the transport hierarchy will improve the location and design of new development? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q19	Do you agree that the policy will enable the planning system to facilitate active travel and the provisions of the Active Travel (Wales) Act 2013? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	

Disagree	
Further comments	
No comments	

Q20	Do you agree that the policy will enable the creation of well-designed streets? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q21	Do you agree with the requirement for non-residential development to have a minimum of 10% of car parking spaces with ULEV charging points? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	

Disagree	
Further comments	
No comments	

Q22	Do you agree with the issues and inter-linkages highlighted in the introduction to the Productive and Enterprising Places chapter? What other issues and linkages could be identified to support this theme?	X
Agree		
Neither Agree nor Disagree		
Disagree		
Further comments		
Q22 Do you agree with the issues and inter-linkages highlighted in the introduction to the Productive and Enterprising Places chapter? What other issues and linkages could be identified to support this theme?		
Mobile UK supports the emphasis within the Productive and Enterprising Places chapter of the importance of being digitally connected.		
To put the matter beyond doubt, it would be helpful to specify that this means both fixed and mobile connectivity		

Q23	Do you agree with the changes to Telecommunications section of the draft PPW? If not, what other changes could be made to clarify the situation? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

Q23 Do you agree with the changes to Telecommunications section of the draft PPW? If not, what other changes could be made to clarify the situation? If not, please explain why.

The wording of paragraph 4.23 of the Draft PPW falls far short of reflecting the importance of mobile telecommunications connectivity in terms of economic aspiration. Compare the wording of para 4.23 to the wording of paras 4.35 to 4.38 (where fixed-line broadband is discussed). Terminology like “...*is of critical importance to Wales’ economy...*”, “*society demands...*”, “...*should be supported by planning authorities...*” and “*In rural areas, access to superfast broadband is essential for both business and social purposes.*”

In a context where 70% of telephone calls are now made from a mobile (v 35% ten years ago), 95% of adults use a mobile, 56% of the population regard a smartphone or tablet their most important device for accessing the Internet and 18% of adults live in a ‘mobile-only’ house, mobile connectivity should be treated on a par with fixed connectivity. It should also reference the Welsh Action Plan for mobile connectivity and reinforce Wales ambition to have world class digital connectivity.

Mobile infrastructure is very costly to deploy; operators do not deploy it wantonly or where it is not needed for extra coverage or capacity.

Each cell site part of a wider network and is sited so as best to provide contiguous coverage, as far as is practical. The working in 4.23 should be more positively framed (similar to fixed) and reflect this context.

Of course, to be effective, the equipment generally has to be visible. The policy should be worded to ensure that while the impact on protected areas and environment should always be minimised through appropriate siting and design, these sensitive areas like Conservation Area, AONB and National Park (some of which create the greatest difficulties in terms of commercial and technical viability for new infrastructure) still require modern mobile connectivity in order to remain sustainable now and in the future and so this must still be given appropriate weight to balance against perceived impact to sensitive areas.

Finally, the mobile telecoms policy in 4.23 centres around the economic importance. Policy must provide comment for the social importance of mobile connectivity, especially to the rural, sensitive landscape parts of Wales – access to emergency services to remote hill walkers in National Parks,

access to emergency services for farmers in remote areas, flood relief in remote villages, contact between elderly and friends and family in remote locations and social inclusion generally.

Q24	Do you agree with the location of the transport infrastructure section in the Productive and Enterprising Places chapter? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q25	Do you agree with the new requirements for local renewable energy planning as set out in the draft PPW? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		

No comments

Q26	Do you agree with the use of the energy hierarchy for planning as contained in the draft PPW? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

No comments

Q27	Do you agree with the approach taken to coal and onshore oil and gas as contained in the draft PPW? If not, please explain why. Please consider each source separately.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

No comments

Q28	Do you agree with the approach taken to promoting the circular economy and its relationship to traditional waste and minerals planning as contained in the draft PPW? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Further comments

No comments

Q29	Do you agree with the issues and inter-linkages highlighted in the introduction to the Distinctive and Natural Places chapter? What other issues and linkages could be identified to support this theme?	X
	Agree	
	Neither Agree nor Disagree	

Disagree

Further comments

Q29 Do you agree with the issues and inter-linkages highlighted in the introduction to the Distinctive and Natural Places chapter? What other issues and linkages could be identified to support this theme?

Within the chapter on Distinctive and Natural places there is a lot of discussion around protection of heritage and other assets, which is entirely understandable. However, Conservation Areas, AONBs, National Park and areas around Listed Buildings also need to be sustainable and functional in a modern context.

Some rural communities are the communities in the hardest to reach places when it comes to mobile connectivity – and subsequently suffer the social and economic consequences. To compound the issue these areas have the greatest technical challenges in terms of topography and sparse population and are also the most likely to be covered via landscape designation. Policy needs to be pragmatic in its balance of minimising visual against the relevant technical, commercial, social and economic factors related to providing modern mobile connectivity to rural communities.

There are also varying degrees of impact when carrying out the balancing exercise between landscape designations and/or heritage assets. The policy should reflect this and provide scope to balance perceived degrees of impact against other elements – such as the significant social and economic benefits of digital connectivity.

The English NPPF, for example, approaches the subject in this way to this...

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...”

Paragraph 133 of the NPPF also provides similar comments for cases when substantial harm is identified. PPW Historic Environment policy should make similar provisions in order to ensure that appropriate telecommunications development can be achieved within, on, or adjacent to heritage assets, to ensure the asset and its surrounding area can be connected and sustainable now and in the future.

Q30	Do you agree with the approach taken to landscape, biodiversity and green infrastructure? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q31	Do you agree with the approach taken to distinctive coastal? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q32	Do you agree with the approach taken to air quality and soundscape? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q33	Do you agree with the approach taken to water services as contained in the draft PPW? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q34	Do you agree with the approach taken to addressing environmental risks and a de-risking approach? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q35	Do you agree that other than those policy statements referred to in Questions 1 to 33 above, the remainder accurately reflect the existing policy? If not, please explain why.	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	
Further comments		
No comments		

Q36	Are there any existing policy statements in PPW Edition 9 which you think have not been included in the draft of PPW Edition 10 and you consider should be retained? If so, please specify.	X
Agree		
Neither Agree nor Disagree		
Disagree		
Further comments		
<p>No comments</p>		

How to respond

Please submit your comments by 18 May 2018, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to: planconsultations-c@gov.wales</p> <p>[Please include 'Draft Planning Policy Wales: Edition 10' in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>Planning Policy Wales Consultation Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information
<p>If you have any queries about this consultation, please: Email: planconsultations-c@gov.wales</p> <p>Telephone: 0300 025 5040, 0300 025 6802 or 0300 025 1128</p>