

Welsh Government's consultation on the National Development Framework 2020-2040

Response from Mobile UK

November 2019

About Mobile UK

1. Mobile UK is the trade association for the UK's Mobile Network Operators (MNO) - EE, Telefonica UK (O2), Three and Vodafone. Our goal is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK.
2. As mobile increasingly becomes the device of choice for running daily life both at home and at work, customers want improved coverage and greater capacity. Mobile UK's role is to identify the barriers to progress and work with all relevant parties to bring about change, be they Government, regulators, industry, consumers or citizens more generally.

Introduction

3. Mobile UK welcomes the opportunity to respond to the Welsh Government's (WG) consultation on the National Development Framework (NDF) 2020-2040.
4. This is a significant time in the evolution of the mobile sector.
5. The industry is currently launching 5G services across the UK, and it is also working towards the delivery of the **Shared Rural Network (SRN)** programme – a project that is designed to deliver a step-change in 4G coverage in the hardest to reach parts of the country, including Wales.
6. The operators are currently investing over £2 billion per annum extending coverage, adding capacity and introducing 5G. The National Infrastructure Commission has forecast that 5G will generate around £173 billion of incremental GDP growth in the UK between 2020 and 2030. Continuing investment in 4G will also extend coverage from the current 57% of Wales's geographic landmass served by all four operators, with a target of reaching at least 85% coverage, going beyond the obligations proposed by Ofcom.
7. This intensive level of investment is driven by the reality that mobile connectivity now permeates all aspects of our domestic and work lives, underpinning inclusion, innovation and economic growth.
8. The overriding theme in our response, therefore, is that not only will this level of mobile investment have to be supported by further reform of the planning regime in Wales but also that the National Development Framework will have to give full recognition to the importance of mobile connectivity to all forms of development, whether they be residential housing, industrial and commercial space, roads, energy generation, tourist destinations or green spaces.
9. The NDF needs to emphasise better the need for a pro-mobile stance that recognises its intrinsic economic, social and environmental value.

Mobile UK Response Overview

10. Mobile UK’s response summary:

- Mobile UK welcomes specific recognition in the NDF that ‘mobile phones are an essential tool in our everyday lives’ and that ‘good mobile communications coverage is important to economic and social wellbeing.’ We very much agree.
- That said, we would expect the importance of digital infrastructure, including mobile, to be called out much more emphatically throughout the document, ranking with equal importance to other infrastructure.
- We support the affirmative action envisaged for Mobile Action Zones, although we urge the WG not to confine such affirmative action just to these zones. We will work with the WG to dovetail the ambitions of the SRN with the Mobile Action Zones.

In the next few years, there will be intensive investment throughout the UK in 5G and in expanding the footprint of 4G into rural areas. This will need active support from the WG, including further planning reform.

Mobile UK Response

National Development Framework (NDF) Outcomes

Q: To what extent do the 11 outcomes represent a realistic vision for the NDF

11. The outcomes that have been articulated represent a realistic, compelling and even necessary vision for Wales’s NDF. Actions to combat climate change, for example, will be essential for the future prosperity of Wales.
12. It is very striking that so many of the NDF outcomes will be central to or supported by good digital connectivity, including mobile. Mobile UK thus strongly disagrees with the assessment in the table on Pages 70 and 71 that the ‘in places with world-class digital infrastructure applies only to 8 Policy area. In the table below we have briefly annotated against the outcomes where mobile will be relevant, thus underpinning the point that planning reform for the communications sector has material knock-on impacts and benefits into other sectors and types of development. For example:

	Outcomes	Comments
	A Wales where people live	
1	<ul style="list-style-type: none"> • and work in connected, inclusive and healthy places 	95% of people have a mobile device. 18% of people live in a ‘mobile-only’ household – often people in lower-income brackets. Mobile connectivity has proved to be very affordable, with tariffs to suit all.
2	<ul style="list-style-type: none"> • in vibrant rural places with access to homes, jobs and services 	Mobile connectivity in rural areas is recognised as being vital for sustaining employment and services and supporting people working flexibly, in an office, at home, or on the move.
3	<ul style="list-style-type: none"> • in distinctive regions that tackle health and socio-economic inequality through sustainable growth 	Ditto.
5	<ul style="list-style-type: none"> • and work in towns and cities which are 	Ditto.

	<ul style="list-style-type: none"> a focus and springboard for sustainable growth 	
6	<ul style="list-style-type: none"> in places where prosperity, innovation and culture are promoted 	Mobile connectivity supports an ecosystem of innovation: The App economy; emerging Internet of Things; applications across a broad range of sectors; connected drones; and connected vehicles, for example.
7	<ul style="list-style-type: none"> in places where travel is sustainable 	Consumers expect to be connected when travelling. Mobile connectivity also provides essential real-time information to improve opportunities for integrated travel.
8	<ul style="list-style-type: none"> in places with world-class digital infrastructure 	5G rollout and deployment of the SRN are core to improving network capacity, capability and coverage. Development of all kinds must make provision for mobile connectivity.
9	<ul style="list-style-type: none"> in places that sustainably manage their natural resources and reduce pollution 	Mobile/wireless connectivity has a very significant role to play in reducing pollution: e.g. IoT applications that will help with environmental monitoring; traffic management; and connecting 'smart cities.'
11	<ul style="list-style-type: none"> in places which are decarbonised 	Mobile/wireless connectivity has a very significant role to play in reducing our carbon consumption (e.g. reducing the need to travel, connecting smart meters, connecting wind turbines to improve yield, providing availability of EV charging points, optimising traffic behaviour.)

13. Within each relevant policy area, therefore, we would expect to see digital infrastructure emphatically called out, alongside other infrastructure. By way of example, [The Planner](#) magazine has recently stated how vital digital connectivity is to sustainable urban growth. In further specific examples (Mobile UK text marked in **bold**):
14. **Policy 3** – “Public Investment, Public Buildings and Publicly Owned Land Welsh Government investments and land holdings will support the delivery of sustainable places. We will work with all public landowners and investors to ensure that new development of a significant scale is located in town and city centres which are accessible by walking, cycling and public transport **and well served with digital infrastructure.**”
15. OR: “**Policy 4** – Supporting Rural Communities the Welsh Government supports sustainable rural communities and appropriate proportionate growth in rural towns and villages. The future for rural areas is best planned at the regional and local level. Strategic and Local Development Plans should plan positively to meet the needs of rural communities concerning housing, transport, **fibre and mobile infrastructure**, businesses, services and diversification in the agricultural sector.”
16. Mobile UK believes strongly that there is insufficient active engagement and support at a local level (e.g. willingness to make public assets available to host mobile sites), and insufficient forethought given to making provision for mobile coverage on, for example, new housing developments, office blocks, shopping centres and roads. Local planning authorities should be

forcing developers to ensure that digital connectivity, including mobile, has been fully considered in all significant development plans.

Q: To what extent will the identification of mobile action zones be effective in encouraging better mobile coverage?

17. Mobile UK understands that the WG has identified several ‘5km hexagons’ which currently have no 4G coverage but contain within them roads, railways, houses, businesses, tourist spots and enterprise zones. Furthermore, for a zone to qualify for WG support, a Local Authority would have to commit to support planning and to provide access to sites owned by the public sector (where they are in the right place).
18. Mobile UK certainly agrees with the affirmative action that local authorities should be taking to encourage and enable coverage being deployed in their areas. If we have a concern, it is that such action should not be confined to Mobile Action Zones but be pervasive across the country. Operators must deliver service and deploy infrastructure across the country, not just in the Mobile Action Zones.
19. The principles being used to define and prioritise where ‘total not-spot’ coverage should be installed are sound. The mobile operators will want to work closely with the WG to ensure that the ambitions for, respectively, the SRN and the Mobile Action Zones deliver the desired outcome – greatly improved 4G coverage in remoter rural areas.
20. It has to be recognised that some of this coverage will be very difficult to deliver, for a multitude of practical reasons and will need to be working within a supportive planning environment. As such, we support the text within Policy 6 that ‘*there is a presumption in favour of new mobile telecommunications infrastructure*’ but would strongly suggest that the second half of the sentence is replaced with something along the lines of ‘and that applications must take a balanced view of all social, environmental and economic considerations’.
21. Furthermore, to support the deployment of 5G and the deployment of the SRN, Mobile UK urges the WG to consult early in 2020 on revised Permitted Development Rights for telecommunications deployment in Wales.
22. To give an outline of measures that will have a very positive impact on the speed and efficiency with which networks can be deployed:
 - Alignment with the fixed telecom operators as to what is permitted under PD (concerning street cabinets and vertical structures; and
 - Requiring that prior approval is required only for ground-based masts, not building/rooftop based apparatus.
23. Also, Mobile UK believes that being able to build some higher masts under PD (with prior approval) would be beneficial, particularly to the programme proposed for the Total Not Spots element of the SRN, allowing mobile connectivity in the remote areas to at last catch up with those already receiving a mobile signal.
24. PD for small cell deployment should also be reviewed, but our working assumption is this will be done on a pan-UK basis as part of the transposition of the EU Electronic Communications Code.
25. As a further support to network deployment, it is also timely to update the Code of Practice/Technical Advice Note 19. Mobile UK understands that this work is underway on this activity, and we stand ready to assist in any way we can.