Priorities for planning in Scotland –NPF4 Position Statement

Comments from Mobile UK

Introduction

1. Mobile UK welcomes the opportunity to provide comments on the Scottish Government's Fourth National Planning Framework (NPF4) Position Statement.

2. For reference Mobile UK submitted [a response](#) to the Scottish Government's early engagement on its priorities for planning in Scotland.

3. We very much welcome that the Position Statement captures succinctly the main thrust of our (and no doubt many others') input in that *"Improving digital connectivity continues to be essential. This is of critical importance to our rural areas, given its role in sustaining existing and future businesses and employment and supporting the wider objectives of rural repopulation and climate change mitigation. The latter stages of the early engagement were also an opportunity to reflect on the lessons learned from COVID-19, including home working, online learning, telehealth and online retail and leisure activities."*

4. At the time of writing, the UK is still dealing with the Covid-19 outbreak; the research that the Mobile UK and others have carried out during this period strongly suggests that the changes of behaviour (more home working, remote healthcare etc.) brought about by the pandemic will never be fully reversed after the threat recedes.

5. To the extent it is possible to take positives from the crisis, opportunities are being presented that will accelerate many of the nation's long term goals, such as reducing carbon emissions and building more sustainable rural communities.

6. As the Position Statement rightly recognises, digital (both mobile and fixed) will provide the essential underpinning infrastructure.

7. Mobile UK's further comments are placed against question 3, where the policies relating to digital connectivity are specifically raised, but they are equally relevant to the other questions (as the Position Statement recognises).

8. For example mobile networks will underpin carbon reduction targets in at least the following ways:

- **Decarbonising the grid**: indirectly enabling lower levels of national carbon emissions from electricity generation through 4G or 5G supported "smart-grid" applications, increasing the proportion contributed by renewables and improving wider efficiencies in distribution and non-renewables generation.

- **Indirectly improving energy efficiency across all sectors** through reducing waste and improving operations. Reduced emissions are largely a by-product of improved productivity and process efficiencies.

- **Reducing carbon emissions from travel** through reducing the number of journeys (e.g. remote monitoring and management, virtual meetings) and reducing the emissions per journey of connected vehicles.

9. As a further example, mobile connectivity will spur economic activity, not just in remote rural areas but across the economy and so, while we recognise the benefits of redeveloping existing infrastructure, it is also very important that the policy must be suitably flexible to support proposals for new infrastructure, such as 5G, where technical constraints often dictate siting and design that cannot be placed in existing locations. The NPF must reflect the great weight placed on socio-economic benefits associated with mobile connectivity.

10. As a final example, mobile networks are a core component of emergency response (as shown by recent examples of travellers being rescued from snow-bound roads in the highlands). We make 20m 999 calls a year from our mobiles and new vehicles are now sold with 'e-call[1]' which relies on mobile coverage being present.

Do you agree with our current thinking on planning for a wellbeing economy?

11. The Position Statement states that one of the policy changes under consideration is "*Supporting the roll-out of digital infrastructure across Scotland in a way which allows planning authorities to manage its impact. We will encourage the redevelopment of existing infrastructure, including retrofitting and shared use of facilities."*

12. It is hard to infer from this statement what policy changes are actually being considered,

13. One of the issues that is of considerable importance to mobile operators is the development of new masts in protected areas, as the Shared Rural Network

---

[1] eCall is a system used in vehicles across the Europe which automatically makes a free emergency call if your vehicle is involved in a serious road accident. You can also activate eCall manually by pushing a button.

Programme is set to provide badly needed mobile connectivity over much of this territory.

14. We fully agree that stakeholder engagement is central to achieving successful planning outcomes and local planning authorities must be in a position to manage the impact of development.

15. With this in mind, Mobile UK will continue to make the case for some new permitted development rights (with prior approval) for new masts and tracks in designated areas, principally because:

- The greater certainty over permission timelines will considerably increase the chance of getting all the c.150 'total not spot' masts in designated areas through planning during the period of the SRN programme. This is a once in a generation chance.

- Masts are only erected when are are needed to add capacity or coverage; they are too expensive to do otherwise. PDRs (with prior approval) can therefore strengthen the hand of local authorities, giving them control over siting and design without forcing them to defend the principle of development.

- PDRs (with PA) empower local authorities while reflecting that each mast is an integral part of an essential national asset; this national asset is interlinked with and underpins so many of the other goals set out in NPF4, such a the path to zero-carbon, the well-being community and sustainable rural economies.

16. As such we propose the Position Statement is slightly amended as follows: "*Supporting the roll-out of digital infrastructure across Scotland in a way which both reflects its national significance to our social and economic wellbeing, and also allows planning authorities to manage its impact. We will encourage the redevelopment of existing infrastructure, including retrofitting and shared use of facilities.*"

Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

No further comments

19th February 2021