

The National Assembly for Wales' Economy, Infrastructure and Skills Committee (EISC) inquiry into Digital Infrastructure in Wales

Memorandum for EISC hearing on 11th October 2018

October 2018

1. Mobile UK welcomes the opportunity to submit comments in advance of the oral hearing on 11th October.
2. When your inquiry was launched in 2017, Mobile UK was encouraging the Welsh Government to publish a Mobile Action Plan, along the lines that had been deployed in Scotland in 2016.
3. We were pleased that this idea was taken up and welcomed the publication of the Mobile Action Plan in October 2017, both for its scope and its ambition.
4. While there is no doubt that the Welsh Government has been progressing some of the items identified, the pace of change needs to be quicker, with some of the Action items yet to be started. At the end of this document, we have provided comments on our perspective of the progress that has been made against each Action item.
5. In the meantime, mobile operators have continued to enhance and expand their networks, and, across the UK, they are investing around £2bn per annum (c.15% of revenues). In December 2017, Ofcom published coverage data based on June 2017 and in the Spring a further update based on data up to December 2017.¹
6. In that six months, there was a 96k hectare reduction in not-spots in Wales (3G/4G), about 5% of the country. 91% of the geographic territory of Wales has 3G/4G mobile coverage from at least two operators (of which 76% is 4G).
7. In the same period, an additional 147k people in Wales gained 4G coverage. 52% of the population now has coverage from all four operators, 91% from at least two operators and 2.8% have no 4G coverage yet. Less than 1% of the population of Wales lives in premises without mobile coverage.
8. This progress has been achieved independently of the Mobile Action Plan. However, mobile operators are now reaching the hardest to reach places and putting together plans to deploy 5G.
9. On the policy front, Mobile UK has been seeking to engage Local Authorities (LAs) with a view to making it much easier for operators to deploy on land and buildings in the public domain. The Welsh Government organised a successful roundtable with LAs in Llandidnod, where the ideas presented by Mobile UK were well received.
10. We have recently published a report '*Councils and Connectivity*' in which we emphasise the importance of political leadership at LA level, the need for LAs to make their assets easily available for mobile use and the benefits of having a digital champion at a senior level to ensure that LAs are aligned to the economic and social benefits accruing from good mobile

¹ Ofcom, Connected Nations Report Spring Update 2018.

connectivity.²

11. The LAs present suggested they would welcome a clear steer from the Welsh Government that connectivity is part of deriving the best value from local assets in line with the new Electronic Communications Code. Mobile UK also presented at a seminar at the Royal Welsh Agricultural Show, organised by Ofcom Wales. It is apparent that much more needs to be done at a grass-roots level to encourage a more collaborative approach to mobile deployment. Mobile operators cannot overcome these significant challenges alone.
12. **If Wales is not to fall behind again regarding mobile deployment and coverage, mobile operators need the actions identified in the Action Plan to be put in train with much more urgency.**

Welsh Mobile Action Plan – Progress Report		
Welsh Government Action	Progress	RAG
Planning Reform		
<p>Commission research to inform changes to permitted development rights for telecommunications equipment to improve mobile connectivity.</p> <p>Deadline: Autumn 2017</p>	<ul style="list-style-type: none"> • <i>Arcadis Report published December 2017. Recommended PD reform, mostly to catch up with England</i> • <i>The Welsh Government is currently consulting on reform to Permitted Development Rights (along the lines of 'catch up with England'). Mobile UK response submitted 26th September 2018</i> 	
<p>Refresh Planning Policy Wales (PPW) to ensure that it highlights the positive relationship between telecommunications and the economy.</p> <p>Deadline: Revised PPW will be published for consultation by Spring 2018.</p>	<ul style="list-style-type: none"> • <i>Consultation conducted April-July 2018.</i> • <i>Engagement to be undertaken Oct 2018 – June 2019.</i> <p>Draft: "NDF Policies will provide a framework for the delivery of modern digital infrastructure across the whole of Wales and will require the technological capacity to be built into the design of new development, infrastructure (including transport infrastructure) and areas of 20 growth and regeneration."</p>	
<p>Mobile network operators will work with the Welsh Government to revise and, if appropriate, consolidate the code of best practice and Technical Advice Note (TAN19) on mobile network infrastructure development.</p>	<ul style="list-style-type: none"> • <i>Awaiting feedback from the Welsh Government.</i> 	

² <http://www.buildingmobilebritain.org.uk/wp-content/uploads/2018/09/68548-Mobile-UK-%E2%80%93-Councils-and-Connectivity-AW-%E2%80%93-web-ready.pdf>

Public Assets		
Facilitate relationships between mobile network operators and mobile network infrastructure providers, and estates managers and other interested parties in Welsh public sector bodies.	<ul style="list-style-type: none"> No deliverables yet although a consultative roundtable held at Llandidnod Wells with LAs. 	
Undertake an audit of the existing asset registers, including the proposed publicly available national public asset register, and assess their suitability for use by mobile infrastructure providers.	<ul style="list-style-type: none"> <i>Mobile UK understands that there has been some assessment of what might be possible within the Welsh Government but not much visible progress yet.</i> 	
Business Rates		
Assess the impact of a reduction in non-domestic rates for new mobile infrastructure (masts, small cells etc.) on investment decisions by the mobile operators.	<ul style="list-style-type: none"> <i>Mobile UK has responded to a Welsh Government consultation on business rates in April 2018.</i> 	
Where evidence suggests that a reduction in non-domestic rates would encourage investment the Welsh Government will consider providing non-domestic rates relief on appropriate mobile mast sites.	<ul style="list-style-type: none"> Under consideration by the Welsh Government 	
Regulation		
Research to understand the opportunities and challenges of geographically differentiated regulation, engaging with Ofcom as appropriate.	<ul style="list-style-type: none"> Welsh Government has been lobbying Ofcom on the terms of the 700 MHz auction 	
Emerging technologies		
Support emerging technology initiatives throughout the country including solutions to support rural businesses.	<ul style="list-style-type: none"> <i>Isolated examples (e.g. O2's Staylittle in Wales)</i> 	
Identify opportunities to develop and test innovative technologies in Wales.	<ul style="list-style-type: none"> <i>Operators are constantly testing new technologies and initiatives where relevant and will share findings where appropriate.</i> 	
Infill		
Scope the extent of any public intervention and mobile operators, through Ofcom, will share appropriate network information to inform its development.	<ul style="list-style-type: none"> <i>No comment</i> 	
Transport		
Explore opportunities for improving connectivity on transport networks.	<ul style="list-style-type: none"> <i>No comment</i> 	