**Mark Kemp**

- **by email to**

Ministry of Housing, Communities & Local Government and

Department for Digital, Culture Media & Sport

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In my capacity as Chair of the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) Transport and Connectivity Board, I write in response to the consultation on the proposed reform of permitted development rights to support the deployment of 5G and extend mobile coverage.

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary, metropolitan and combined authorities, along with Local Enterprise Partnerships, sub-national transport bodies and corporate partners drawn from key service sectors. ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK. We are delivering the projects that are key to unlocking broader economic success and creating more resilient communities, economies and infrastructure.

ADEPT members are pleased that the government launched its consultation seeking views on amending permitted development rights for operators with rights under the Electronic Communications Code (Code Operators) to support the deployment of 5G and extend mobile coverage. In partnership with Local Bodies and telecommunications providers, huge progress has been made on the Building Digital UK (BDUK) superfast broadband rollout which now stands at 96% of premises with access to speeds greater than 24 megabits per second (24Mbps) across the UK. Headway is being made via the local full fibre networks approach too, currently standing at just shy of 10% full fibre coverage to the nation.

However, until now, mobile connectivity has not featured.  It needs to, especially if the UK is serious in its ambitions to be at the forefront of emerging technologies and given the growing evidence that mobile connectivity has become a necessity to local economies. Improving digital connectivity for people and businesses in non-metropolitan areas is a key strand of work ADEPT’s Transport and Connectivity Board.  We have strong alignment to the work of the Local Government Association (LGA) on this very issue. It is vital that place-based infrastructure reaches rural areas to assist the rural economy in both growing and creating jobs.

We support the government’s ambition to provide better coverage in rural areas, especially prioritising those​ areas that have no coverage at all.  Whilst we welcome the opportunities 5G and extended mobile coverage brings, we also recognise the need to strike the balance between the landscape, connectivity and how its implementation impacts the communities we serve.  We therefore offer the following nine key points on the subject:

* There is significant discrepancy between Ofcom’s mobile coverage data and the lived experience.  The areas outside dense urban locations experience consistently poor and unreliable levels of mobile signal. ​It is important that communities can realise the benefits of mobile infrastructure deployments in their areas. As a priority, we would urge you to test and challenge Ofcom to undertake further evaluation and review of current coverage claims.
* All new build homes and employment sites/businesses must be provided with full fibre broadband infrastructure to enable connectivity to fixed fibre-optic broadband. ​We would also believe that developers and mobile network operators must work together to ensure that new developments have future-proofed mobile coverage
* The introduction of permitted development rights for broadband infrastructure has led to many structures not being deployed in optimal locations (i.e. locations which minimise the visual impact on the local area, without comprising the network design, breaching technical constraints and resulting in increased costs). It is essential that lessons are learnt from this and appropriate are mitigations put in place to ensure that the visual impacts of mobile infrastructure on streetscapes and landscapes are minimised. Currently, many of these mitigations are required via planning conditions (e.g. painting masts in appropriate colours, screening base stations with hedges (in indigenous native species etc).
* The quality of design of masts is important too.  While the design of mobile handsets for the end customer has improved dramatically, the masts still look utilitarian and unsightly.  There should be more robust design guidance especially for putting masts in sensitive locations
* The view of the Planning Officers Society is that the permitted development process must be clear and transparent if people are to have faith in it, there must be adequate prior notification of what the mobile network operator wants to build, in order for the public and local planning authority to query or object
* As the agreed in principle Shared Rural Network suggests, there must be greater expectation and encouragement that mobile network operators will share existing infrastructure where possible, rather than simply building more masts
* There needs to be more effort ​promoting the benefits of enhanced mobile coverage (5G and 4G) to allay public concerns over the 5G coverage
* Increasing the delivery of mobile networks must not be at the expense of delivering full fibre networks​. Whilst we understand that the government wants universal coverage of gigabit-capable connectivity, we believe that mobile must be a complementary rather than a replacement infrastructure for full-fibre connections
* It will be important that network operators invest in skills training so that their workforce and subcontractors are able to optimise site locations etc

Thank you for the opportunity to share our views on this important issue.

Yours sincerely,



Mark Kemp,

Chair, ADEPT Transport & Connectivity Board

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