

Written Evidence – Economy, Infrastructure and Skills Committee

The Mobile Action Plan for Wales was launched in October 2017. The plan was developed following consultation with local authorities, the mobile industry and colleagues from across the Welsh Government.

The Action Plan focuses on nine key areas where the Welsh Government can use the levers at its disposal to support creating the right environment to further improve connectivity in Wales. However, it is important to recognise both the opportunities and limitations of what the Mobile Action Plan for Wales can deliver.

Coverage in Wales

Wales has particular characteristics in terms of topography and population density which pose challenges for mobile operators when deploying mobile infrastructure. The challenges are reflected in the Ofcom Connected Nations update report 2018 which provides a snapshot of mobile coverage for Wales and the other home nations.

Coverage has improved over recent years but the report shows that coverage in Wales is not as extensive as in the other home nations. Indoor call coverage is available in 80 per cent of premises of Wales compared to 92 per cent across the UK. Across the UK, 86 per cent of the landmass is covered for data services (3G and 4G) from all four mobile operators compared to 70 per cent in Wales. Notspot areas where there is no data coverage account for 5 per cent of the Welsh landmass compared to only one per cent across the UK.

Telecommunications Policy

Telecommunications policy is not devolved to Wales, the key levers for improving mobile coverage reside with DCMS and Ofcom. Using the levers available to them in a way that can benefit Wales, particularly rural and very rural areas, will have the biggest impact on improving mobile coverage. The Welsh Government has engaged with both the UK Government and Ofcom to highlight how the powers available at a UK level could improve connectivity in Wales.

Coverage Obligations

Introducing coverage obligations attached to spectrum auctions is a key lever at Ofcom's disposal to leverage improved mobile coverage in Wales. Ofcom carried out a consultation earlier in the year on their proposals to introduce obligations for the auction of 700Mhz spectrum. The properties of this spectrum are well suited to deliver mobile coverage in rural and very rural areas. As such, it is vital in improving mobile coverage in Wales.

In response to the consultation the Welsh Government felt that the proposals reflect its view that better coverage is needed where people live, where they work, where they spend their spare time and while they are on the move. Geographic coverage obligations, as proposed in the consultation, would help meet those needs and recognise the need to prioritise premises where there is currently no coverage.

The Welsh Government welcomed the recognition that coverage in Wales still falls behind other nations. However, Ofcom proposed geographic coverage obligations that were lower in Wales (83 per cent of landmass) than in either England or Northern Ireland (92 per cent of landmass). Our response highlighted the inequity and unacceptability of this proposal and highlighted that setting a lower target for Wales will simply perpetuate the current inequality of coverage.

The Welsh Government's response to the consultation also suggested a fundamental change to the basis of the auction to precipitate greater coverage uplift across the UK and establish equity of coverage. This would require geographic coverage obligations to be provided at no cost to the Mobile Network Operators (MNOs) to allow more investment to deliver to a greater proportion of the landmass than is currently anticipated. The auction could then be undertaken not on the basis of the amount that the MNOs are prepared to pay for the spectrum but on the amount of coverage they are prepared to invest in.

Ofcom intend to publish the outcome to the consultation shortly.

Regional Roaming

It is clear that a one size fits all approach to regulation of the mobile industry, as is currently the case, does not serve the needs of rural Wales. The Welsh Government has a track record of encouraging Ofcom to take a geographically differentiated approach to regulation, which disproportionately supports harder to reach areas, where regulation is designed to meet local and regional needs. A key element of this is domestic roaming. This would allow customers to roam across operators in much the same way as foreign tourists can do using non British SIM cards. This would not have an impact on complete notspots but would improve connectivity in partial notspot areas where coverage is not available from all four operators. Indeed in their recent paper 'Further options for improving mobile coverage: Advice to Government' Ofcom advocate exactly this approach. Their assessment shows that regional roaming could improve coverage by 2-3 percentage points for the holders of the 700 MHz coverage obligations and by 5-10 percentage for the other operators.

Mobile Action Plan for Wales

As highlighted above, telecommunications policy is not devolved to Wales and therefore the Mobile Action Plan focuses on nine key areas where the Welsh Government can use the levers at its disposal to create the right environment to further improve connectivity in Wales.

The plan purposely did not set out in detail the eventual solutions but instead provided a roadmap for improving mobile phone coverage in Wales. Neither was it anticipated that there would be a quick fix. The plan concentrates on tackling the barriers to good mobile connectivity particularly in rural and very rural areas by working with the mobile industry, local authorities and Ofcom.

Ongoing engagement with industry and other key stakeholders has continued. A meeting was held in June in Llandrindod Wells attended by nineteen local and

national park authorities, three of the four mobile network operators and their industry body, Mobile UK to discuss the role that local authorities could play in improving mobile connectivity. A further meeting is planned for later in the Autumn to discuss further proposals.

Planning

As set out in the action plan, research was commissioned to inform changes to permitted development rights for telecommunications equipment to improve mobile connectivity. This research was completed in December last year and published in January 2018. The research was commissioned to investigate if permitted development rights as they currently apply to mobile telecommunications infrastructure are fit for purpose and are able to help deliver the Welsh Government's aspirations for improvements to telecommunications coverage across Wales.

Following the completion of the research, proposed changes to telecommunications permitted developments rights formed part of a wider consultation on the Town and Country Planning (General Permitted Development) (Wales) Order (GPDO), and this is due to close on 28 September. The consultation includes the following telecommunications proposals :

- Changes to mast heights allowed under permitted development;
- Changes to mast widths allowed under permitted development;
- Changes to the definition of a small cell antennae and small cell systems;
- Changes to permitted development rights in relation to antennas, small antennas and small cell systems;
- Extended permitted development rights in relation to emergency use of mobile telecommunications equipment.

Once the consultation has been completed the responses will be considered and, if merited, new planning rules introduced. It is proposed that any amendments to Part 24 (Telecommunications) of the GPDO will be split in to two phases, with changes to mast height, mast width and the emergency use of mobile telecommunications forming part of an amendment order coming in to force in spring next year. Further amendments to Part 24, including changes relating to antenna, are proposed to be introduced later next year.

In addition to the consultation on permitted development rights, a consultation was conducted earlier in the year on changes to Planning Policy Wales (PPW). The consultation sought opinions on a range of changes to the document, including to the mobile telecommunications section to update it to recognise the economic benefits of having good, reliable and fast communication networks. The proposals encouraged planning authorities and network operators to work collaboratively to identify areas of limited connectivity and ways the planning system can help to address this. The consultation also sought to clarify the situation regarding mobile phone developments and health. The consultation only drew one response from the mobile industry.

The responses are currently being analysed, with a view to publishing the new version of Planning Policy Wales in December this year.

The action plan also identified a need for mobile network operators to 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. This element is dependent on the changes to both permitted development rights and Planning Policy Wales and so cannot be progressed until these have been agreed.

In addition to the above, work is also progressing on the preparation of the National Development Framework (NDF). The National Development Framework will be a 20 year national spatial plan for Wales, which will sit alongside PPW. The purpose of the NDF is to support the delivery of Prosperity for All by developing a clear long term spatial direction for Government policy, action and investment and for others who the Government works with.

The NDF will achieve this by identifying key growth areas, the type and location of infrastructure we need, by coordinating the delivery of housing, employment and connectivity infrastructure, and by directing key partners to help deliver the national spatial vision.

The NDF will recognise the importance of digital infrastructure to Wales's future prosperity and well being. It will support the delivery of digital infrastructure to help achieve the Welsh Governments objectives to improve broadband and mobile phone coverage across Wales.

A consultation on the Issues, Options and Preferred Option took place between April and July this year and the responses are currently being assessed. A draft NDF is due to be issued in 2019 and the final document published in September 2020.

Public Assets

In support of open data and transparent government, work is ongoing across departments within Welsh Government to develop a Digital National Asset Register (DNAR), which could be used to provide information to mobile operators. The current intention is that the register will be hosted on the existing Space Cymru Portal.

The longer term aspiration remains to include all public sector land and building assets in Wales on a DNAR as we continue to encourage public sector partners to fully utilise the e-PIMS (electronic property information mapping system). Via the work of the National Assets Working Group the Welsh Government continues to champion best practice collaborative asset management and to maximise the value from our own land and buildings resources.

Thinking creatively about the question of assets, their location, and who else could use them, offers the best opportunity to maintain and improve service delivery with reduced resources.

In order to drive forward initiatives and good practice collaborative asset management activity across the Welsh public sector, the government funded the Welsh Public Sector Collaborative Estate pilot in the Cwm Taf area.

A report was published in September 2017 confirming that there are significant opportunities if public services work together and take a strategic approach to property and property management across geographical and organisational boundaries. It highlighted opportunities to integrate services; improve customer experience; create wider efficiencies; rationalise the estate and improve the quality of public service assets by investing more in fewer, shared physical assets.

To add impetus to the work of NAWG the Welsh Government has made funding available to support the property collaboration agenda, with an initial emphasis on improved asset mapping. This forms part of the new 'Asset Collaboration Programme in Wales (ACPW)' and the NAWG needs to ensure that this new programme will prioritise initiatives that support asset collaboration across Wales. It is hoped that this funding programme will help to accelerate the progress in establishing a publicly accessible Digital National Assets Register in Wales.

Having a clear picture of all public sector assets in Wales provides an important dimension to maximising positive outcomes for people and communities whilst also delivering value for money.

As part of engagement with local authorities, the use of their assets has been discussed and could form part of activity to tackle specific notspots. For example, officials have held discussions with representatives from Newport Council regarding their efforts to map their public assets in support of their ongoing LoRaWAN project across the region.

Non- Domestic Rates

Welsh Government undertook a call for evidence exercise earlier in 2018 into non-domestic rates. It sought from the mobile industry clear evidence on the measurable improvements in mobile coverage of introducing a reduction on non-domestic rates for new mobile masts. Officials have now assessed the evidence received. Although the mobile industry made coherent arguments for the introduction of non-domestic rates relief on new masts, they did not provide detailed evidence to underpin a compelling case for the introduction of a rates relief scheme. Similarly they did not provide information on the business case mechanics, thresholds or measures that they use to determine whether to deploy a site, nor the precise way in which rates relief could therefore trigger an investment decision. Without this information, introducing a scheme for rates relief on new mobile masts in Wales could not be supported.

The respondents to the call for evidence did, however, provide a number of valuable insights and useful ideas. These are currently being assessed by officials as to whether they could form the basis of a more focused rates relief scheme. In particular, whether a relief scheme could be combined with other interventions in order to tackle specific notspots. Work to develop a proposal is underway and more information will be available later in the Autumn.

Regulation

As highlighted above, officials continue to have discussions with colleagues in Ofcom regarding the regulatory approach in Wales. Welsh Government has been pressing for a geographically differentiated approach to regulation in Wales. These discussions have focused on geographic coverage obligations for upcoming auction of 700Mhz spectrum and regional roaming.

Innovation and emerging technologies

The topography and population density in Wales throws up specific challenges for mobile coverage. Extending coverage as far as possible is likely to require innovative solutions particularly in rural areas. Mobile connectivity and new 5G technology also have the potential to underpin innovative technical solutions for both businesses and the public sector in Wales.

The Mobile Action Plan highlighted the importance of developing and testing new technologies in Wales. The plan highlighted work already underway in Teifi Valley and on Llanbedr airfield. Since the action plan was published work has continued the support the development of new technologies.

Officials continue to have discussions with officials at Newport Council regarding the ongoing rollout of their LoRaWAN project to social housing within the county. Officials are working to establish contact with local manufacturers of small cell technology to support technology already in use by contracted partners via colleagues in Welsh Government Innovation Team.

Officials have engaged with the 5G Innovation Centre (5GIC) at the University of Surrey which brings together leading academic expertise and key industry partners in a shared vision. The 5GIC helps to define and develop the 5G infrastructure that will underpin communication infrastructure of the future. The Welsh Government has also commissioned Innovation Point to identify and develop up to three strategic 5G projects capable of delivery.

Officials are also engaging with Ofcom to encourage closer collaboration, along with other countries to further understand the potential applications of 5G and how they could work here in the UK.

There are numerous examples across Wales where the Welsh Government is supporting the development, introduction and testing of new mobile technologies, as follows:

- Officials Worked with Menter Mon and Gwynedd Council teams to develop and deliver an Internet of Things playground in Glynllifon Country Park to be launched on 12 October.
- Arranging workshops and a business breakfast on internet of things in the Haven Enterprise Zone in early October, in collaboration with Valero, RWENPower, & Pembrokeshire college.

- Engaged with tourism stakeholders along the “Wales way” in order to identify any mobile notspots and mobile capacity issues

Infill solutions

A business case is being developed for publicly funded mobile infrastructure in areas that have no mobile connectivity. It is envisaged that this will be combined with other interventions in defined areas of Wales to improve mobile connectivity. The viability of this type of intervention, the costs, ownership and funding models will be assessed in the business case. Work to identify potential candidate sites is underway. Officials have met with their counterparts in the Scottish Government to discuss the public sector infill project in Scotland and to learn the lessons from their roll-out. In their paper ‘Further options for improving mobile coverage: Advice to Government’ Ofcom advocate a public infill approach as likely to be an effective tool for covering total not spots.

Transport

An option to improve mobile connectivity was included as a future contract addition as part of the procurement of the Wales and Borders rail services contract. This was designed to be in line with the Mobile Action Plan ambitions to improve 4G mobile connectivity across Wales. Work is currently underway to explore how this facility can be used to enhance mobile connectivity across the whole Wales railway network.

Officials are also following the project on the trans Pennine route in England where a trial is taking place to put high bandwidth broadband on trains using 5G type technology. If successful, the findings of that project could be used to improve mobile connectivity on routes in Wales and exploit the opportunities that 5G has to offer.

Emergency Services Mobile Communications Project

The emergency services mobile communications programme (ESMCP) will provide the next generation communication system for the three emergency services (police, fire and rescue, and ambulance) and other identified public safety users. The contract to deliver the infrastructure supporting the Emergency Services Network was awarded to EE. However, in some areas, including some very rural areas in Wales, the UK Government will fund the construction of additional masts in order to infill coverage along some routes.

Public funded mobile masts will be future proofed by deploying larger mast bases and robust towers capable of supporting multiple operators. This will allow multiple mobile operators to install their transmission equipment to provide coverage in remote areas where building a mast is not commercially viable. There are 63 such masts planned for Wales. Officials continue to engage with the programme to understand the likely impact on mobile services across Wales.

A recent UK Government review into the Emergency Services Mobile Communications Programme (ESMCP) is complete and the programme will now be proceeding on the basis of incremental adoption.

Major events and special projects

Officials are working closely with colleagues within the Major Events team to facilitate discussions with organisations and individuals with responsibility for events and special projects across Wales. As outlined in the action plan officials have compiled a list of key events in Wales. Discussions with event organisers are focussing on determining the requirements of mobile coverage within the immediate events area and surrounding communities, that see spikes in population and high footfall during event dates. Discussions have focussed on the mobile coverage barriers faced by event organisers and the steps needed to rectify poor connectivity for attendees.

Discussions are ongoing with organisers of the Hay Festival, Festival #6, the National Eisteddfod, "Sweetspot" (organisers of the Tour of Britain and the new Wales 360 mountain bike event), Velethon Wales, The Wales Way walking route and the Newport Marathon.