

Scottish Government's consultation on Draft NPF4

Submission from Mobile UK

February 2022

Introduction

1. Mobile UK welcomes the opportunity to submit a response to the Scottish Government's consultation on the Draft National Planning Framework 4 (NPF4).
2. Overall, the draft NPF4 recognises the central importance that digital infrastructure now plays in our national life, a role that has been rapidly accelerated as a result of the pandemic.
3. Mobile UK strongly supports the overall approach in NPF4, but we would nonetheless like to suggest some important amendments.
4. The main change we would like to see is in relation to Policy 23 (digital infrastructure), where the text in the policy does not fully capture the essential nature of digital infrastructure, as expressed (rightly) elsewhere in the document.
5. This can have real-life practical consequences.
6. The NPF is a core document. Planning officers and committees use it in the front line to assist them in their day-to-day decision-making and aid them in weighing the many factors that feed into any planning decision. If the economic and social value of digital infrastructure is underweighted in Policy 23, this will work against the overall ambition of NPF4.
7. In terms of text, the policy could be amended along the lines that we have set out in the Annex to our response. Such amendments would really help to ensure that planning practice and policy, as executed at a local level for digital infrastructure, is well aligned with the national requirement.
8. This is particularly important for some of the most sensitive areas in Scotland, which are also the most difficult areas in which to install mobile infrastructure. Telecoms services will be vital across all parts of Scotland, including Conservation Areas, National Scenic Areas, Green Belts, National Parks etc.
9. Infrastructure of any kind is always likely to have some level of visual impact, whether that is a road, bridge, street light or mobile telecoms base station.
10. Such visual impact must always be balanced against the relevant social and economic benefits. While MNOs do all they can to minimise the visual impact of network rollout through well thought-out siting and design, especially in sensitive and designated protected areas, planning authorities must be understanding of the constraints of telecoms infrastructure and radiofrequency and be fully appreciative of the social and economic benefits it delivers.

Other policy areas

11. Mobile urges that the reform of Permitted Development Rights continues across many policy areas. There are several reforms under way, following the Scottish Government's Sustainability Appraisal in 2019¹. The implementation of the programme has been delayed by the impact of Covid-19. SG should look to get the programme back on track.
12. Mobile UK is particularly interested in the reform of PD rights for hill tracks, which will be very important for the delivery of the Shared Rural Network programme, where over 300 new 4G sites will be built in Scotland, with all of them needing some sort of access track for both building and maintenance.
13. Furthermore, beyond Policy 23 for digital infrastructure, there are other policy areas where it would be very helpful to make reference to the contribution of digital infrastructure, for added emphasis and clarity, for example:

Development to address climate change (Policy 2)

14. Mobile (& fixed) telecoms services will become a vital component of the strategy for addressing climate change, and this should be referenced in this section.
15. Mobile operators' investment in 5G, which will underpin IoT (Internet of Things) and machine to machine connectivity, will facilitate "smart" initiatives and bring about connected digital solutions that decrease energy consumption, travel and transport and reduce carbon and other greenhouse gas emissions.
16. High quality modern mobile connectivity will facilitate other sectors in reducing their carbon footprint, for example, through smart meters or other smart infrastructure (by consuming power more intelligently), smart industry (to make manufacturing more efficient with less wastage), smart sensors in bins, so there are refuse collections only when absolutely required.
17. All these applications, which will assist in reducing greenhouse gas emissions in other sectors, are underpinned by mobile connectivity both in rural and urban settings. Most UK cities already have smart city programs in place to capture the various social, economic and climate change benefits that the digital revolution will bring. Governments are putting in place programs to deliver rural connectivity for the same reason. Mobile UK has produced a report that explains this potential more fully.²

Liveable places (Policy 6)

18. Modern mobile connectivity, smart initiatives and IoT will help to evolve how we live: remote healthcare/consultations for vulnerable people, automated industry, automated transport, connected security, access to 5G connected emergency services (such as ambulances), enabling people to be safer, healthier, and more

¹ The Scottish Government's Programme for Extending Permitted Development Rights in Scotland: A Sustainability Appraisal - 2019

² <https://www.mobileuk.org/connectivity-and-climate-change>

prosperous. This carries significant social and economic benefits right across the country.

19. Better connectivity will assist in eradicating regional & urban/rural divides. High-quality rural connectivity, which the Shared Rural Network³ seeks to provide, facilitates home and remote working, thus reducing the need for people to relocate away from rural communities to the main urban centres for work. Rural communities have long since suffered with their young people moving away, leaving an ageing population.
20. Similarly, businesses do not invest in areas with poor digital connectivity. For this reason, businesses are often forced to relocate and invest in urban areas where digital connectivity has traditionally been stronger. This has impacted on rural living. Modern connectivity across all parts of the country, including rural areas, assists in regenerating communities to create more resilient, vibrant, and prosperous places to live throughout Scotland.
21. Operators who deliver this kind of modern connectivity need a national planning policy that understands and adds appropriate weight to how their infrastructure facilitates and underpins these benefits.

Infrastructure first (policy 8)

22. In recent policy documents ‘Forging Our Digital Future with 5G: A Strategy for Scotland’, August 2019 and ‘Realising Scotland’s Full Potential in a Digital World: A Digital Strategy for Scotland’, March 2017, the Scottish Government set out its ambitions, writing: *“Technology transforms the way in which we live our lives. It connects us in new and different ways. It puts more power into the hands of the users of services and offers new insights and opportunities for those who provide them. It creates a platform and a momentum for innovation and has the potential to fundamentally redefine the relationship between the public sector and the people it serves.”*
23. In light of our usage of digital services throughout the Covid outbreak, we all now understand what this means.
24. Without resilient fixed and mobile broadband networks, the dent in the UK’s economy would have been considerably greater. And it will be our digital sector that provides the engine to power the economy’s revival.
25. Planning Policy must now reflect this and lean decisively toward digital infrastructure with a planning regime that recognises its critical importance.

³ <https://www.mobileuk.org/shared-rural-network>

ANNEX

Policy 23: Digital Infrastructure

We want our all of our places to be digitally connected.

Digital connectivity is now essential for ~~has a central role to play in~~ unlocking the potential of our places and the economy and in opening up more remote parts of Scotland for investment and population growth. This infrastructure will play an increasingly important role in supporting smart applications for essential services including healthcare and education. We want to ensure that no areas are left behind by closing the digital divide. The planning system should continue to support the rollout of digital infrastructure across all of Scotland, ensuring that policies recognise the importance of future-proofing infrastructure provision whilst addressing impacts on local communities and the environment.

- a) Local development plans should support the **delivery of digital infrastructure**, particularly in areas with gaps in connectivity and barriers to digital access.
- b) Development proposals should incorporate **appropriate, universal and futureproofed digital infrastructure**. This should be done in consultation with service providers.
- c) Development proposals that deliver **new digital services or provide technological improvements**, particularly in areas with no or low connectivity capacity, should be supported. Planning authorities should not question the need for the service to be provided where proposals are clearly aligned with fulfilling the delivery of local or national policy objectives which support the rollout of digital infrastructure in areas with no or low connectivity where there are benefits of this connectivity for communities and the local economy.
- d) Development **proposals for telecommunications development** should be supported where:
 - the visual and amenity impact of the proposed development has been minimised through careful siting, design and where appropriate landscaping, while giving appropriate consideration to and having an appreciation of the technical constraints that must be overcome⁴;
 - for new infrastructure (as against upgrades) it has been demonstrated that all practicable options and alternative sites have been considered, including the possibility of using existing masts, structures and buildings and/or site sharing (recognising that sharing may require stronger/taller masts)
 - ~~there is no physical obstruction to aerodrome operations, technical sites or existing transmitter/receiver facilities. (See Note)~~
- e) Development proposals that are likely to have an adverse effect on the **operation of existing digital infrastructure** or on the delivery of strategic rollout plans should not be supported unless appropriate mitigation measures can be provided.

Note: Mobile UK has suggested the removal of the third bullet above. Operators will continue to consult with aerodromes etc., as planning laws require, and this will continue to work well.

⁴ Suggested text is taken from PAN62

On the very rare occasions that an issue arises, planning authorities do not have the appropriate expertise to resolve. The responsibility lies with Ofcom who manage the airwaves. The recent press coverage of the possibility of 5G signals interfering with aircraft altimeters is a good example. If a planning objection had arisen on these grounds, an LPA would not have had the necessary competence to resolve.