Sinead McEvoy

From:	Sean McHenry
Sent:	09 April 2019 11:14
To:	Sinead McEvoy
Cc:	Elaine Mullin
Subject:	RE: Local Development Plan Consultation - Telecommunications Development Stakeholders
Attachments:	Northern Ireland LPA LDP Consultation Response - Cornerstone - Vodafone and O2.pdf

Hi Sinead,

Please find attached representation that I hope may be given consideration when writing Strategic and Policy sections of the LDP.

Thank-you.

Regards,

Sean

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Classification: Unrestricted

-----Original Message-----
From: Sinead McEvoy [mailto:Sinead.McEvoy@midulstercouncil.org]
Sent: 15 March 2019 08:57
To: Sean McHenry
Cc: Elaine Mullin <Elaine.Mullin@midulstercouncil.org>
Subject: Re: Local Development Plan Consultation - Telecommunications Development Stakeholders

Dear Mr McHenry,

In follow-up to my email below I have checked the correspondence that we issued to 'consultations bodies' on 22nd February 2019 and I can confirm that Cornerstone (CTIL) were issued with a consultation letter (as required by the Local Development Plan Regulations). The consultation was issued to the Readibg, Berkshire address and included a hard copy of our Draft Plan Strategy.

Northern Ireland Council Local Development Plan Consultation
Representation on Behalf of Vodafone and Telefonica (O2)

Context

Cornerstone was founded as a joint venture between Vodafone and Telefonica (O2) to manage the network sites and infrastructure for both companies including the consolidation of sites to create a single grid. We generate efficiencies in cell site deployment and the operation of the network infrastructure on behalf of the operators.

Introduction

"Government has a clear ambition for the UK to be a global leader in the next generation of mobile technology – 5G. Good digital infrastructure is a building block of the Government's modern Industrial Strategy - it creates new opportunities for growth by allowing business to be done on the move; unleashing dynamic business models; and opening up new opportunities and markets. It also supports us in our everyday lives - connecting us with friends, family and colleagues; helping us to stay safe; and giving us access to information and services that we increasingly take for granted[1]"

Introduction to the The UK Government's 5G strategy March 2017

Modern connectivity is now not just important but economically and socially transformative with this importance is now widely recognised. The Ofcom Infrastructure Report – Connected Nations (2018)[2] states:

"People now rely on being connected through calls and online services more than ever, whether at home or on the move. So, it's important that they have access to reliable, good quality broadband and mobile connections, to help them keep in touch with friends and family, shop and pay bills online, or stream the latest must-see TV Series.

People's expectations of communications services continue to grow. In this year's Communications Market Report we found that 88% of adult internet users spend an average of 24 hours online each week, almost double the time spent in 2007. People are now able to do more online - on average people now use 240 GB a month on a fixed connection (a growth of 26% compared to last year) which is approximately the equivalent of people downloading 160 films. People now spend an average of two and a half hours a week online

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[1]

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/597421/07.03.17_5G_strategy_-_for_publication.pdf

[2] https://www.ofcom.org.uk/research-and-data/multi-sector-research/infrastructure-research/connected-nations-2018

when they are not in home or work – this has quadrupled since 2007 and can be linked to improvements in mobile data services, encouraging people to get online more often.

We expect these trends to continue as companies invest in new technologies such as 5G and full fibre. This will support innovative new services across manufacturing, logistics, agriculture and healthcare. Ofcom shares the UK Government's ambition for the UK to be a world leader in these technologies. We are working with the UK and devolved governments and companies to promote the innovation and investment needed to meet the UK's demand for coverage and capacity."

The Department of Culture Media and Sport (DCMS) who have oversight of the communications sector and have just concluded their Consultation on *'Statement of Strategic Priorities for Telecommunications, the Management of Radio Spectrum and Postal Services*[3]*'* stated recently:

"The Government acknowledges that there has been a profound shift over the last decade in the way citizens approach and access digital communications. What was once seen as a luxury is now a basic need, and people expect to have access to fast broadband at home, irrespective of where they live, and use their mobile devices anywhere they go."

Within the 'Digital Connectivity Portal'[4] the UK Govt states...

"The government wants to see nationwide full fibre coverage by 2033. **We also want the UK to be a world leader in 5G, with the majority of the population covered by a 5G signal by 2025.** *The Future Telecoms Infrastructure Review*[5]*, outlined a package of measures to create the right market and policy conditions to deliver world-class connectivity for citizens and businesses.*

These measures include removing barriers[6] *to deployment of fibre and mobile networks, making it easier for network providers to access government buildings and public investment in fibre for rural areas.*

Local authorities and property developers also have a vital role to play in ensuring that all parts of the UK can enjoy the many social and economic benefits of the next generation of digital connectivity. *Network providers, in turn, must work collaboratively with local authorities and property developers."*

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779226/SSP_Consultation_-_Publication_Version__2_.pdf
4 https://www.gov.uk/guidance/digital-connectivity-portal
5

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732496/Future_Telecoms_Infrastructure_Review.pdf
6 http://www.broadbanduk.org/wp-content/uploads/2018/07/BSG-Report-Lowering-barriers-to-5G-deployment.pdf

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1. In the last 10 years or so mobile communication has become as least as important to peoples' lives as other essential services such as power and water. 95% of adults own a mobile device and around 40% of us own more than one.

2. As a key indicator of the mobile's evolving place in our lives, advertising spend on mobile has risen from near zero in 10 years to £5.7 bn[7], more than the total annual spend on TV advertising, and about 50% of all digital advertising.

3. Even though the market reached maturity in terms of subscriber numbers some time ago, the introduction of smartphones in 2007 and the deployment of 4G from 2012 has led to a very rapid rise in total network traffic – a rise that is set to continue for the foreseeable future. **The recent 7 times rise has arisen almost exclusively from the greater use of mobile data.**

4. In the next few years, mobile operators will be rolling out the next generation of technology (5G) to further enhance the capabilities and capacity of mobile broadband networks.

5. It is very important to recognise that mobile infrastructure is a **national** network delivered at the **local** level and is dependent on the planning system to deliver at the local level and so it is imperative that Local Plan and Framework policies are up to date, relevant and aligned to National policy and guidance and ultimately supportive of the Government's aspiration to be a world leading digital economy

6. Excellent mobile connectivity is vital to local communities and economies:

Social inclusion

- 95% of people own a mobile device. Entry cost is very low (£15 for a basic phone)

- Those looking for houses and jobs can be alerted by text message of new opportunities. Research shows that good mobile connectivity increases participation in the labour market.

- Local Authorities increasingly use mobile enabled applications to deliver public services more efficiently and effectively (such as for adult and social care)

- Mobile connectivity supports flexible/home working. 22% of people in rural areas are home workers and 13% in the urban areas[8]

Safety

- From April 2018, all new cars sold in the UK are fitted with E-Call (whereby an automatic call is made to 999, with location, in the event that an airbag is triggered)

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[7] https://www.statista.com/statistics/281750/mobile-advertising-spending-in-the-united-kingdom-uk/
[8] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676594/Statistical_Digest_of_Rural_England_2018_January_edition_v2.pdf

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- Tourists and visitors can use navigational tools and call for assistance, if required

- Lone workers in remote places can be better safeguarded

Economic activity

- Applications connected through mobile enable greater efficiencies in industrial and agricultural processes

- Providing access to services such as banking and retailing, where the physical footrpint of such facilities is reducing

- Supporting other large parts of local economies, such as healthcare and other public services

- Providing mobile connectivity to the UK's 39 million incoming tourists (many of whom go to rural areas) and the 70 million visitors to National Parks (almost all of which are in rural areas)

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Suggested text for the Local Development Plan Strategy and Policy in relation to telecommunications infrastructure and promotion of better mobile connectivity:-

- *"**Mobile and telecommunication networks are a now crucial part of our national infrastructure.** Communities rely on good quality mobile connectivity for their professional and personal lives and to access essential services. Mobile connectivity is also essential to realising a number of objectives, including prosperous communities, social inclusion, an effective transport network, and improved employment, and other economic outcomes.*

- *Consequently, the social and economic and economic benefits of modern mobile connectivity will be treated as a material consideration in weighing up the merits of a planning application. This should be given significant weight in determinations and the balancing exercise against other material considerations.*

- ***The local authority will proactively seek to promote mobile and digital connectivity by allowing the development of infrastructure such as masts and base stations, where these are needed to meet growing demand for connections and capacity.*** *The local authority will also ensure that proper consideration is given to how improvements in connectivity and increased demand will be met within any new proposals for residential, commercial and other development. Moreover, the impact on existing mobile coverage of new developments will be considered, so as to ensure adequate steps are being taken to maintain coverage.*

- *The planning dept will give consideration to the site specific and technical constraints associated with telecommunications infrastructure development at a particular location. Mast siting, height and design are largely dictated by external factors such as topography, tree/building 'clutter', distance from transmission backhaul or power. This is particularly relevant in rural locations, where the benefits of mobile connectivity are often felt most greatly but where AONB and landscape designations add additional sensitivity.*

- *The LPA will consult MNOs when they receive applications for large scale developments that bring significant population influx to an area or that include large physical structures. Large scale developments can cause capacity issues that need to be addressed and large structures may cause physical obstruction to coverage footprints or transmission backhaul links (which could see numerous sites go dead, impacting a large scale coverage area).*

- *In Strategic planning allocations and designations the Local Authority will consider the necessity for mobile telecommunications like any other utility. Any new development allocation will require modern mobile connectivity for its current and future sustainability. The LA will consider allocating a small area within strategic landuse allocations and masterplans for mobile communications base stations and infrastructure.*

- *The planning authority must determine applications on planning grounds only. The planning dept will not seek to prevent competition between different operators,*

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question the need for an electronic communications system, impose a ban on new electronic communications development in certain areas, impose blanket Article 4 directions insist on minimum distances between new electronic communications development and existing development, insist on maximum height requirements relative to surrounding landuse, or set health safeguards different from the International Commission guidelines for public exposure.

- Telecommunications service is required everywhere, including Green Belt locations where people still live, work and travel. Mobile telecommunications infrastructure does not harm the openness of a green belt nor does it constitute a spread of built form. It is therefore considered as development that is not inappropriate in the green belt.

- For proposals that may have an impact upon a heritage asset the planning dept will identify and assess the particular significance of any heritage asset and the degree of impact upon it from the proposal. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including the material social and economic benefits of modern connectivity.

- Applications for mobile telecommunications infrastructure that services transport networks and hubs (for road, rail and air) should be supported. Modern connectivity on transport infrastructure is vital for emergency services, assists the economy by facilitating productivity while in transit and will be vital for future 'Internet of Things' applications – driverless cars, smart signage or street lighting etc

  Quality mobile communications also assists transport infrastructure by reducing the need to travel – minimising congestion.

- **There shall be a presumption in favour of development which supports the expansion of mobile and digital connection networks.** Applications for phone masts, base stations and other mobile infrastructure will be approved provided that:

  a) the siting of the proposal and any other additional equipment involved with the development does not unduly detract from the appearance of the surrounding area. However, balance is needed and local authorities must be pragmatic and appreciative that sensitive areas like Conservation Areas also depend upon modern and fit for purpose mobile connectivity for their overall sustainability

  b) realistic alternative sites and potential mast sharing opportunities have been assessed and rejected.

  c) the proposal conforms to the International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account of, where appropriate, the cumulative impact of all operators equipment located on the mast/site."