

Partial Not-Spots Consultation
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Dear Sir/Madam,

CNPA RESPONSE TO TACKLING PARTIAL NOT-SPOTS IN MOBILE PHONE COVERAGE CONSULTATION

Thank you for the opportunity to respond to this consultation. The Cairngorms National Park suffers disproportionately from poor digital connectivity and this disadvantages businesses, communities and individuals who live in and visit the Park. This relative disadvantage has increased significantly in recent years as there is now an expectation that mobile connectivity will be widely available to everyone. Indeed, it has been recognised that connectivity is now a key factor in the destination choices of potential visitors. This letter sets out some general issues to do with digital connectivity in the Park and key issues are addressed under each of the specific consultation questions.

Background:

The Cairngorms National Park has a unique rural economy which is heavily reliant on a number of key sectors but, in particular, the tourism sector which accounts for 43% of jobs. Indeed, the National Park includes the Aviemore area which is the most tourism intensive economy in Scotland with a strong family and outdoor activity market.

The Cairngorms National Park Partnership Plan (2012-2017), the management plan for the Park, states that planning and supporting improvements to the mobile communications network which improves access to new generation technology, and minimises the need for visually intrusive infrastructure, are a priority. Key to this will be identifying and delivering mobile communications improvements to meet current and future needs of business, communities and visitors in the Park. This will help to deliver the long-term outcome of a sustainable economy supporting thriving businesses and communities.

Therefore, CNPA has been working with partners (including the UK Mobile Operators Association, Scottish Government, Highlands & Islands Enterprise, Community Broadband Scotland, Aberdeenshire Council, Scottish Land & Estates, Cairngorms Business Partnership, and the Association of Cairngorms Communities) to address the issues relating to digital connectivity.

Survey information:

In 2011 CNPA undertook a Park wide survey on mobile/broadband connectivity. There were over 600 responses, 32% from businesses, with the following issues being highlighted;

- 20% of all respondents said they have no mobile coverage at all in their home or business
- 39% of all respondents said they have a poor or intermittent signal in their premises
- More than three quarters of respondents in the survey claimed that 3G coverage is either poor or non-existent
- Less than 7% rated their service is good or very good within the Park

Although this survey was undertaken almost four years ago there has not been a marked improvement in mobile connectivity during the subsequent period. We have no specific new information about the extent of partial not-spots in the National Park but have little doubt that we will have a much higher proportion than the UK land mass as a whole. And yet the Park is home to almost 18000 people and is a destination for 1.4 M visitors per year.

General Policy:

In Scotland the General Permitted Development Rights for communications apparatus do not extend into National Parks, National Scenic Areas, etc. This approach reflects the high scenic quality of the area and the need to ensure that any new apparatus is considered carefully. In November 2014 the CNPA Planning Committee approved a new policy for the Local Development Plan (due to be adopted in Feb 2015) on the Siting and Design of Digital Communications Equipment:

Proposals for new telecommunications or other digital communications equipment will only be permitted provided that all of the following criteria are met, to the satisfaction of the Park Authority

- a) details on the siting, design and appearance of the proposed apparatus and associated structures that demonstrate that the impact on the visual amenity, character and appearance of the surrounding area is minimised;*
- b) in sensitive areas detailed evidence that the proposals would not lead to unacceptable effects on areas of particular ecological interest or landscape importance; archaeological and other cultural heritage sites; conservation areas or buildings of architectural or historic interest;*
- c) evidence that opportunities for mast and site sharing as well as installation possibilities on buildings or other existing structures have all been fully considered - and such opportunities taken, wherever appropriate and practicable;*
- d) the choice of equipment to be installed should be the smallest possible that is commensurate with the technological requirements;*
- e) every effort should be made to conceal, camouflage or otherwise disguise masts, other equipment installations and associated building structures as well as cabling;*
- f) details of any proposed landscaping and screen planting, where appropriate, and how this would effectively address the particular aims of its provision;*
- g) details demonstrating how the proposal best meets operational needs and fits into the wider network, having explored alternative options and having had regard to the local context and the cumulative impacts that would arise; and*
- h) a written declaration that the equipment and related installations are all designed to be in full compliance with the appropriate industry guidelines and regulations applicable at the time – such as the ICNIRP guidelines for public exposure to radiation frequency.*

Mobile Infrastructure Project:

CNPA staff have worked positively with the contractors responsible for the delivery of DCMS's Mobile Infrastructure Project (MIP) in the hope that this may provide increased service to the very rural areas of the National Park. The project originally identified only three potential mast sites which were disappointing given that the Cairngorms National Park is the UK's biggest with a land area of over 4,500 km². However, following a re-examination of the project criteria and other factors, this was reduced to two sites. To date there is no evidence that any improvement will be delivered at these sites. Further discussions with Arqiva have highlighted several issues which may mean that MIP has no impact in the Cairngorms National Park. These issues are;

- Transmission – line of site is particularly difficult in the Cairngorms national Park. Project policy means that a maximum of 2 'hops' will be considered
- Power – cost of providing electricity can be prohibitive and make sites unviable
- Backhaul – securing access to a broadband network is very difficult given the rural nature of the sites identified. As with transmission there is only provision for 2 'hops'
- Infrastructure requirements – Arqiva have requirements of a fenced compound, a 20-30m lattice radio mast (6 sectorised with 2 dishes), cabinets and power supply. Also, due to cost implications helicopter access is not an option so vehicular access tracks are specified. Disguising/lessening the visual impact of infrastructure is also restricted by cost (although colour is optional).

Cost issues will impact severely on the viability of MIP sites being delivered in the Cairngorms National Park. This is compounded by the infrastructure requirements which will undoubtedly prove to be too visually intrusive to allow planning approval given CNPA policy.

It is important therefore that any new policies are financially, socially and environmentally sustainable and do not have any unintended consequences, such as negating investment in improving connectivity in hard to reach or sparsely populated areas.

We have restricted our responses to those matters on which we feel competent to comment and look forward to learning of progress on this most important matter for rural areas of Britain.

Yours faithfully

Murray Ferguson

Murray Ferguson
Director Planning and Rural Development

CNPA RESPONSES

Q.1: Do you agree that there is a need to improve the coverage of voice and text services in partial not-spots and that Government should seek to extend such coverage?

A.1. Yes. This should be a priority. However, it should not be restricted to voice and text services as access to mobile broadband has vast implications for rural economies and public services. There is also a safety element, particularly given the mountainous geography of the National Park and the outdoor activities undertaken in this unique landscape.

Q.2: To what extent are sharing arrangements scalable beyond the simplest sites that could be shared?

A.2. CNPA is not in a position to comment on the economics of shared mast sites but we consider that mast sharing should be strongly incentivised, especially in areas like National Parks where proliferation of masts can be problematic. Our recently adopted planning policy states that *evidence that opportunities for mast and site sharing as well as installation possibilities on buildings or other existing structures have all been fully considered - and such opportunities taken, wherever appropriate and practicable*. This has implications on visual impact as well as coverage.

Q5: To what extent do you consider that mast sharing will achieve sufficient improvements in tackling partial not-spots?

A.5: Mast sharing, when combined with additional incentives to invest in additional infrastructure, will be a welcome first step. Further investment in additional infrastructure will also be required.

Q9: Do you consider that national roaming should be implemented in the UK?

A9: Although superficially attractive, such an approach would require to be combined with requirements to invest in remote and rural areas so that they do not lose out over time through lack of incentive.

Q.14: To what extent are agreements between landlords or wireless infrastructure providers and MNOs a limiting factor in pursuing passive infrastructure sharing, multi-operator MVNOs, or national roaming?

A.14. It is understood that rent and rates can account for half the operating costs of a mast making the infrastructure unviable. In rural areas, there is potential for community organisations to help address their own service problems through providing common user sites and infrastructure at a cost which would make it attractive for the MNOs to provide and maintain services there. Given the national and public good considerations, DCMS and Government should seek ways of making investment and the maintenance of operating infrastructure more attractive in such locations.

Q.25: Please let us know if you have any additional comments on this consultation.

A.25. Although economics will have a significant impact on the wider roll-out of Mobile infrastructure in rural areas CNPA is also interested in finding solutions to the visual & social impacts of increased infrastructure. CNPA would be willing to work with partners such as DCMS

to try and find sustainable solutions to the cumulative impact of mobile phone infrastructure within sensitive environments. This could include planning and landscape advice or even acting as a test area for new designs of disguised, concealed or visually acceptable infrastructure.

CNPA
Nov 2014