

Local Authorities as Connectivity Enablers

End of Study Report

July 2023



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Executive Summary

There has been significant progress in the deployment of fixed and mobile digital infrastructure across the UK with all parties working together to drive rollouts in cities, towns, and countryside. The targets for coverage keep on rising, as they should, which means the pressure to reduce barriers and improve efficiencies will continue. Therefore, it is important that the deployment of digital infrastructure is delivered as efficiently as possible in order to ensure better coverage, improved capacity and future-proofed networks that benefit local authorities' residents and businesses.

Regardless of how digital infrastructure is being rolled out, whether fixed or mobile and commercially or through government subsidised programmes, all deployment happens in local authority areas. This is why the role of local authorities as a key enabler is essential to maintain and accelerate the pace of telecoms deployment.

The Digital Connectivity Forum commissioned this research to explore the role of local authorities as enablers of advanced digital connectivity.

This report sets out to examine practical options and tools to assist local authorities as they continue to play their important role in rolling out digital infrastructure. The report explores remaining challenges facing operators and local authorities and considers non-legislative avenues for improvements.

The study gathered views from a wide range of local authorities and government bodies and industry stakeholders including telecom operators, mobile network operators, neutral host

providers, Ofcom, and others. Interviews were held with all participants over several weeks, with views captured and anonymised.

The study reports around four key themes which were identified as:

- 1. COMMUNICATION AND ENGAGEMENT**
- 2. PLANNING**
- 3. STREET AND ROADWORKS**
- 4. LOCAL AUTHORITIES AS LANDLORDS AND SITE PROVIDERS**

Whilst there are examples of good practice that have been identified throughout this study, they remain inconsistent across industry, local and national governments. Where good practice does exist, this is because of the right conditions having been put in place – a clear vision, senior buy-in, dedicated resources, clear and consistent policies and processes, and proactive engagement.

In general, greater emphasis is required on improving communications between parties and adopting a more collaborative approach to successful deployment of this critical national infrastructure.

Good communication alone will not resolve all the challenges noted in the feedback received, and focus needs to be given to ensuring that policies and guidance are up to date and aligned with the requirements of current and future technologies and are consistently applied by those responsible for their application.

Recommendations

A total of 27 recommendations have been made as a result of this research:

THEME 1: COMMUNICATION AND ENGAGEMENT	
Department for Science, Innovation and Technology	
R1.	Secretary of State for Science, Innovation and Technology should issue letters to Local Authorities providing clear guidance on the requirement and role of digital champions in local authorities. Consider options to mandate this in the same way as other roles (DPO, Caldicott Guardian, Section 151 etc).
R2.	Funding should be allocated to local authorities to support the role of digital champion with a mandated job description / skills level to ensure there is consistency across all local authorities. The digital champion role should be tied to the UK Government's wider commitments and targets for digital infrastructure to ensure local digital priorities also complement the national agenda.
R3.	Improve communication from UK Government with the devolved administrations and local authorities. Ensure roles and responsibilities are clearly defined with regards to digital infrastructure deployment including establishing MoU agreements with each local authority's digital champion (once established), like those in place between BDUK and the devolved administrations for Project Gigabit.
R4.	Greater consideration for any future digital projects or pilots should be given to the different stakeholders responsible for the planning and street works processes in the devolved administrations so that all have the ability to participate with central government initiatives.
R5.	Consider how more accurate, granular information can be shared with local authorities and the general public on planned public interventions to reduce the burden on local authorities who are often the first point of contact for enquiries.
R6.	Work with local authorities and industry to develop and implement a clear communication strategy to raise greater awareness of the benefits of fixed and mobile digital connectivity for wider distribution by digital champions internally within local authorities. This should be cascaded down to all departments within a local authority responsible for managing digital infrastructure including planning, highways, and economic development teams as well as being promoted by senior leadership to ensure there is consistent messaging with regards to the benefits.
R7.	A standard guidance document should be developed by DSIT in collaboration with the LGA which can be adopted by Councillors to help improve the overall awareness of the benefits of all digital connectivity, the impact of deploying both fixed and mobile digital infrastructure within their communities and the differences between the technologies being deployed.
R8.	Conduct research to establish how many Local Authorities have digital champions in place, capturing details of where this role sits within the organisation, job description and grade to inform how greater consistency can be achieved.

Industry	
R9.	Telecom operators should consider taking a similar digital champion approach as local authorities to aid communication and reduce barriers.
R10.	Telecom operators should work with local authorities to develop clear and consistent communication plans for engagement with all stakeholders including members of the public during the planning process. Communications should highlight the benefits of digital connectivity similar to Mobile UK's 'Live Better Connected' programme ¹ as well as why the technology is needed.
R11.	Telecom operators should provide education to planning authorities on how networks are built, the infrastructure required, and any design constraints so that planning authorities have a better understanding on why certain site locations are chosen in the network design process.
Local Authorities	
R12.	Ensure planning and highways teams are sufficiently knowledgeable regarding the latest planning legislation including the recent changes made to the ECC and permitted development rights relating to digital infrastructure deployments. These teams should also be aware of the latest guidance and best practice documentation available such as BDUK's Barrier Busting Handbook.
R13.	Develop a proactive approach across all departments towards digital infrastructure deployment and ensure all local policies and plans are aligned with national

objectives. This includes ensuring local policies regarding a drive to reduce street clutter is balanced against the need for digital infrastructure.

THEME 2: PLANNING

Department for Science, Innovation and Technology

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| R14. | As a priority, provide support to update Northern Ireland's planning regulations in relation to telecoms infrastructure including permitted development rights to avoid further misalignment with the other UK nations. |
| R15. | Review the existing planning process in relation to pre-planning guidance and analyse the current fees being applied by local authorities. Guidance documentation on the pre-planning process should be developed which gives local authorities greater guidance on what constitutes 'pre-planning application' advice as well as outlining an appropriate fee structure. |
| R16. | Work with local authorities to produce best practice guidance for planning applications including what an 'ideal planning application' should look like and the information it should contain. This will provide further clarity to telecoms operators about what they need to include in an application as well as giving planning authorities greater understanding about what good should look like and what to expect from telecoms operators regarding different technologies. |
| R17. | Work with the Department for Levelling Up, Housing and Communities to review the National Planning Policy |

¹ Live Better Connected > Introduction | Mobile UK

Framework (NPPF) for England regarding the deployment of 'high quality communications' to ensure this is up to date and aligns with recent technology changes (such as 5G deployment), and the advice reflects changes for planning applications submitted under the General Permitted Development Order (GPDO). The document should also reiterate to planning authorities the need to determine applications on planning grounds only and should be revised to include the use of local authority public assets for the deployment of digital infrastructure to ensure they are making effective use of publicly owned land and assets as much as possible

Scottish Government

R18. Review the Town and Country Planning (General Permitted Development Scotland) Act to ensure this enables digital infrastructure to be deployed at the pace needed in order to meet coverage targets for the SRN and those set out in the Wireless Infrastructure Strategy. Specifically, review the restrictions around building new or replacing / upgrading sites in designated areas. Consider removal of restrictions around access tracks to make it easier for operators to build and then service and maintain (in particular) mobile mast sites long term.

Local Authorities

R19. Undertake analysis of planning application rejections to understand the reasons for rejection and opportunities for improvements.

THEME 3: STREET AND ROADWORKS

Department for Science, Innovation and Technology

R20. Work with DfT to further promote the benefits to local authorities of flexible permits including publicising any future planned trials by DfT of these schemes as a way to increase wider adoption of flexi permit schemes.

Department for Transport

R21. Work with the devolved governments to introduce a more uniform national (UK wide) approach to managing street works. This should reflect the different types of digital technology being deployed to better manage large-scale infrastructure deployments. This should consider best practice from each nation on how they operate their notice and permitting schemes, and how this can be applied more universally across the UK.

R22. Review KPIs for street/roadworks that are being monitored by highway authorities and analyse KPIs at a national level to understand the variation in statistics being reported and to ensure these remain appropriate for large-scale deployment of new digital infrastructure. Consider if less stringent performance indicators can be introduced to improve the duration and working hours of work and traffic management permitted for telecoms operators.

Industry

- R23.** Telecom operators should include early engagement with local authorities (both highways and planning), as a standard part of their deployment planning processes to help mitigate and avoid deployment issues, such as having to redesign the network due to planning refusal as well as ensuring alignment with other street works activities.
- R24.** Telecom operators should instigate improvement programmes to enhance the quality of work by their street works subcontractors, including health and safety, planning, and communications. Operators should implement appropriate governance: monitoring, auditing, and site visits to ensure works are being performed to standard, and engagement with local authorities is consistent to ensure high quality within the wider supply chains.

Local Authorities

- R25.** Investigate the potential benefits of adopting a flexible permit scheme by learning from previous successful trials such as the Joint Authorities Group (JAG), Openreach and Sheffield City Council trial supported by DfT and DSIT. Consider running similar small-scale local trials and consider participation in any future DfT trials regarding flexible permits in order to gain valuable information on future street works policy and how flexible permits can be executed successfully.

THEME 4: LOCAL AUTHORITIES AS LANDLORDS AND SITE PROVIDERS**Local Authorities**

- R26.** Ensure accurate asset data is available for industry and internal departments and that any external agents acting on their behalf as intermediaries are focused on the wider benefits that digital connectivity enables over maximising revenue generation from assets.
- R27.** Facilitate access to public sector land, rooftops, and other assets such as street furniture, and where possible make some of these assets available as a trial to telecoms operators to test their viability. Local authorities should use the standard templates and pricing agreements previously developed by DSIT as part of the DCIA Pilot.



Introduction

Introduction

About DCF

The Digital Connectivity Forum (DCF) is an expert advisory forum for the entire digital connectivity sector and through collaboration, evidence-building and research, acts as the UK Government's primary advisory group on the provision of seamless digital connectivity.

The DCF has a diverse network of members that includes telecom operators, equipment manufacturers, ISPs, mobile network operators, content producers, broadcasters, business groups, central and local government, the devolved administrations, Ofcom, and others. Further details of the members and the work of the DCF can be found at connectivityuk.org.

The Study

The DCF has recognised the role that local authorities can play in enabling the rollout and adoption of advanced connectivity. Whilst national connectivity projects have been created, they need the support from local bodies to deliver, manage the local incentives and social priorities, and help to drive adoption of digital connectivity. There is also the not insignificant requirement to help overcome local deployment challenges and key touch points such as wayleaves, street/roadworks, planning, access to public assets, communications, and regulation, all of which needs management at a local level to create the right environment to deliver digital infrastructure at pace.

However, local bodies are faced with conflicting demands for their limited resources, and it would be easy to pull back from direct project and programme involvement in supporting and promoting digital connectivity. Therefore, recognising the importance of their role, this study examines any further practical steps that local bodies should undertake to support the continuing improvement of broadband and mobile coverage as well as uptake of services across this infrastructure.





Methodology & Background

Methodology

Overview

The study was conducted over a period of 4 months from April to July 2023 and gathered views from a wide range of local authorities and government bodies and industry stakeholders including telecom operators, mobile network operators, neutral host providers, Ofcom, and others. This was to capture what is working well, understand the challenges that remain, and identify changes that would help further support the deployment of digital infrastructure across the UK.

Stakeholder Engagement

In total 31 organisations were invited to participate in the study. This included Local Authorities and regional Combined Authorities across England, Scotland, Wales and Northern Ireland to ensure that views were captured from each region across a range of urban and rural geographies. For industry this covered both fixed and mobile digital infrastructure operators and other relevant stakeholders responsible for policy and regulation. A list of the participants is provided in Appendix C.

A discussion guide was issued prior to interviewing participants to provide additional context on topics such as Communications, Street/Roadworks, Public Assets, Planning and Regulation to aid discussion.

Interviews were held with all participants over several weeks, with views captured and anonymised to ensure that all participants felt

comfortable and able to give open and honest views based on their experiences.

Analysis

Views from all the participants were analysed to draw out key themes and establish lessons learned which could provide a model for other local authorities, industry, or other stakeholders to consider.

Our analysis included:

- The role of the local authority in enabling digital connectivity in their area;
- How local authorities can resource and/or up-skill internal teams;
- Current practice for supplier engagement;
- Current practice for planning and street/roadworks;
- Current practice for informing communities and engaging with landlords;
- Current practice for standardising the use of public sector assets;
- Regulatory levers available to drive digital infrastructure.

Limitations of Study

As with many studies it was not possible to engage with every industry player, local authority or other stakeholder involved in the deployment of digital infrastructure. Despite this, it is apparent that the same themes came up consistently with those who did participate. A particular challenge was that only those who are typically seen as delivering good practice were willing to engage and share their views as part of the study. As such there is a risk that areas of specific poor practice were not necessarily identified in this study.

Relevant legislation and Policy Objectives

Every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need where they live, work or travel. To help deliver this the UK Government and the government from each of the devolved nations has set out a number of strategies, objectives and programmes, details of which are provided in Appendix A.

The main legislation relating to the deployment of digital infrastructure in the UK is the Electronic Communications Code, permitted development rights, and street works legislation. While telecommunications are a reserved power, meaning that overall policies and targets are set by the UK Government, some areas of legislation relevant to the deployment of digital infrastructure such as planning, street works and building regulations are devolved

responsibilities and can vary slightly in each nation.

Details are provided in Appendix B.

Report Structure

The remainder of the report is structured by themes, capturing feedback from industry and local government and key observations within each theme.





Theme 1: Communication and Engagement

Communication and Engagement

The benefit of a local digital strategy is evident

Local authorities with a strong digital strategy have a vested interest in improving digital connectivity and as a result have more incentive for constructive engagement with industry. This can vary by geography with rural authorities typically having more to gain from improved connectivity and so being more willing to engage compared to urban local authorities where improved connectivity may not be regarded as such a priority.

SUNDERLAND CITY COUNCIL

Sunderland City Council's City Plan, built around three key themes of Dynamic Smart City, Healthy Smart City and Vibrant Smart City, clearly set out their ambition to create a connected, international city with opportunities for all by 2035.

This plan has helped attract significant investment in full fibre and 5G deployment across the city, which along with work on demonstrating the use cases to businesses and residents has led to Sunderland being internationally recognised as a leading smart city.

The role of the digital champion is essential

Having a single point of contact who can act as a 'digital champion' is seen as a significant differentiator across local authorities when compared to those where a single point of contact is more operationally focussed on planning or highways/roads.

Where good practice exists, a digital champion holds a role solely focused on digital and is typically a relatively senior 'Economic' or 'Place' based role within the local authority with a strong degree of internal influence. They not only promote digital within the wider organisation and help others understand how improved connectivity can help meet local objectives, but they can also act as a facilitator and/or convenor between parties prior to and during deployment.

It was suggested that a similar digital champion role within industry organisations could help improve communications as local authorities often find it difficult to find the right contact to engage with at the right level within industry, having to rely on sales focussed contacts, or those at the front end of deployment who are not able to discuss their plans and objectives at a strategic level.

The digital champion can also help build business cases for digital investment within the local authority and raise interest and support at all levels, particularly management who are often unaware of the importance of 'digital'.

There is a need to improve education within local authorities

There is an ongoing requirement to improve education within local authorities, including at the leadership level, to allow the full potential of digital technologies to be realised and the rollout of digital infrastructure to be prioritised by senior leadership.

Telecom operators commented that to help address this knowledge gap, best practice guidance could be improved alongside more regular communication regarding new technologies and their potential uses / benefits together with more information about the enabling infrastructure required in order to provide the end-to-end network connectivity within an area.

One of the key elements of feedback was that whilst the benefits of digital connectivity are generally understood, this is not seen as a high enough priority within the public sector overall due, in part, to scarcity of resources. As a result, communication and promotion of digital connectivity and its benefits are therefore poor and decisions often take too long (both at a central government and local authority level).

It was felt that a more holistic approach to digital connectivity is required, as resources, projects and programmes of work are typically aligned to a single infrastructure type, without enough thought given to the inter-relationship or dependencies that exist between these such as the need for fibre to support backhaul connectivity at mobile sites, and the overall desire for both fixed and mobile connectivity within communities.

It was also noted that guidance for local Councillors has become disjointed and outdated, with separate guidance now published by DSIT and the LGA leading to confusion about which should be used. Feedback was that the DSIT guidance² for Councillors was too narrow in its focus, concentrating on the gigabit programme, and the LGA guidance regarding digital connectivity³, whilst better, in that it included all aspects of digital connectivity including wireless, was now outdated and was in need of refresh given recent changes to planning policies.

Communications still have room for improvement between industry and local authorities

Feedback from local authorities is that communication with industry is generally poor, with mobile operators cited as being less easy or willing to engage outside the formal planning process, and fixed infrastructure operators more willing to share their plans. This supports the view that communication engagement remains at different levels of maturity across local authorities and telecoms operators.

Alongside this, local authorities feel there remains a tendency for industry to hold them responsible for deployment challenges or delays. This is despite a perceived unwillingness by industry to engage at the initial planning stage and throughout deployment, which leads to unnecessary tension when trying to resolve issues that arise.

² <https://www.gov.uk/guidance/a-councillors-guide-to-project-gigabit>

³ A councillor's guide to digital connectivity | Local Government Association

Communication between levels of government could be improved

There is a growing perceived disconnect between the role of local authorities and UK Government in the deployment of digital infrastructure. On the one hand, local authorities say they are encouraged to devote their limited resources to a digital champion role, whilst at the same time UK Government have taken over the central management of programmes such as Project Gigabit and the Shared Rural Network (SRN). A key part of this feedback was that local authorities felt excluded from the decision making process regarding deployment within their area and are simply being left to deal with the challenges of responding to the inevitable enquiries about where and when deployment will happen without the tools to be able to respond to such matters. They also feel they cannot proactively work with suppliers to overcome deployment challenges such as wayleaves, planning or street works without a greater level of involvement in these programmes. In some cases, it was felt that this may lead to, or had already resulted in, a breakdown in trust between local authorities and BDUK who are leading on this activity for UK Government. It was noted that currently it is hard for members of the public to find out what is going on in terms of improved connectivity in their area.

A specific frustration for local authorities is the difficulty in getting information from BDUK or the operators directly about the extent of current / planned deployment of digital infrastructure so that they can consider where focus is needed to meet local and national objectives. It was also noted that there is a perceived

misconception that urban areas are all well connected despite many pockets of poor connectivity, both fixed and mobile, remaining that still require attention to resolve.



Clear definition of stakeholder roles and responsibilities is required

Improving engagement between local authorities, UK Government and operators is seen as vitally important to ensure both commercial and publicly subsidised deployment is successful. To support this, local authorities, believe a clearer definition of stakeholder roles and responsibilities is required. Organisations on both sides (including senior roles) currently lack awareness of what they are required to do and how they should act on these responsibilities and whilst there is some best practice information available, this is not universally known about or acted upon. In addition, problems with responsibility and decision-making being made at different levels of government (for example local authorities responsible for planning decisions but UK or devolved administrations are responsible for planning guidance) and poor communication / joined up working between these organisations which causes challenges.

Local authorities in the devolved nations of Scotland, Wales and Northern Ireland typically felt less involved due to telecoms infrastructure being a reserved matter and programmes being run at a devolved nation or UK-wide level.

Interestingly, feedback suggested that a more formal engagement strategy between all parties which is enforceable may be required, and that this would help overcome national and local inconsistencies in both the level and quality of information shared. DSIT have published a 'code of practice'⁴ on how mobile operators should engage with local authorities, however this

is not universally adopted by either telecom operators or local authorities.

Explaining the benefits to the public helps to mitigate concerns

Local authorities stated that a longer-term communications and engagement strategy is required and that the benefits of digital connectivity, and how this can help specific stakeholders, should be publicised to help mitigate concerns regarding short-term disruption resulting from deployment. It was also suggested that as well as the benefits being outlined, it should be more clearly explained to residents the effects of not having digital connectivity within their area.

It was suggested that more should be done by all parties with regards to public messaging to outline benefits that improved digital connectivity will offer and to help mitigate the negative impact of miscommunication and conspiracies. This was particularly related to the deployment of 5G, which can have a significant impact if unchecked. However, it was noted that nobody is keen to take on this role due to its contentious nature.

The benefits of testbeds and trials are evident

Improvements in engagement and communication between parties were noted by mobile operators where the UK Government have outlined the benefits of connectivity to local authorities via the 5G Testbeds & Trials programme⁵ and the

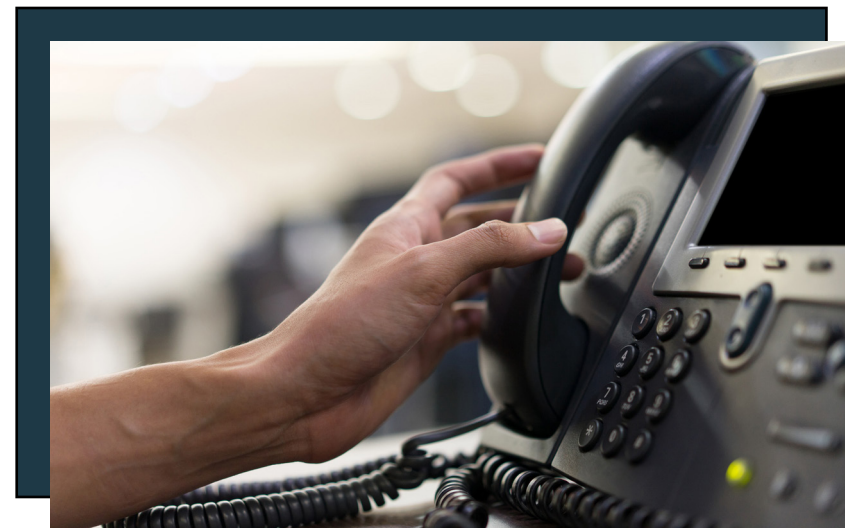
⁴ Code of practice for wireless network development in England - GOV.UK (www.gov.uk)

⁵ <https://www.gov.uk/guidance/5g-testbeds-and-trials-programme>

recently published UK Wireless Infrastructure Strategy.

There is a strong link to the Digital Phone Switchover⁶

As work accelerates towards the 2025 deadline for the legacy analogue phone network to be migrated to new IP-based services, the need for ubiquitous digital connectivity coverage will become even more important. The change will impact almost every citizen and organisation alike, and effective communication and engagement will be essential in ensuring the transition is successful.



⁶ <https://www.techuk.org/accelerating-innovation/digital-phone-switchover.html>

Conclusions

- **THE BENEFIT OF A LOCAL DIGITAL STRATEGY IS EVIDENT:** local authorities who have a published digital strategy are more proactive in reducing the barriers to fixed and mobile deployment and communicating its benefits, resulting in better coverage levels and the associated economic and social benefits being realised.
- **THE ROLE OF THE DIGITAL CHAMPION IS ESSENTIAL:** A clear message from both local authorities and industry is the need for informed and proactive local authority digital champions. Where these are in place, they are more likely to have better relationships with telecom operators and be more proactive in improving network rollout.
- **THERE IS A NEED TO IMPROVE EDUCATION WITHIN LOCAL AUTHORITIES:** an understanding of how networks are built and why sites or street works are needed will help with planning and engagement
- **COMMUNICATIONS STILL HAVE ROOM FOR IMPROVEMENT BETWEEN INDUSTRY AND LOCAL AUTHORITIES:** a lack of early engagement on telecoms operators' future deployment plans, inconsistent approaches especially from some mobile operators, all lead to local authority issues on resource and joint engagement
- **COMMUNICATION BETWEEN LEVELS OF GOVERNMENT NEEDS TO BE IMPROVED:** the benefits of digital connectivity are not being promoted sufficiently within local authorities leading to a fragmented approach to industry
- **CLEAR DEFINITION OF STAKEHOLDER ROLES AND RESPONSIBILITIES IS REQUIRED:** to improve communication and joined up working across layers of government with their different responsibilities
- **EXPLAINING THE BENEFITS TO THE PUBLIC HELPS TO MITIGATE CONCERNS:** both local authorities and industry can do more to communicate the wider benefits and help facilitate the installation of new infrastructure

Recommendations

DEPARTMENT FOR SCIENCE, INNOVATION AND TECHNOLOGY	
R1.	Secretary of State for Science, Innovation and Technology should issue letters to Local Authorities providing clear guidance on the requirement and role of digital champions in local authorities. Consider options to mandate this in the same way as other roles (DPO, Caldicott Guardian, Section 151 etc).
R2.	Funding should be allocated to local authorities to support the role of digital champion with a mandated job description / skills level to ensure there is consistency across all local authorities. The digital champion role should be tied to the UK Government's wider commitments and targets for digital infrastructure to ensure local digital priorities also complement the national agenda.
R3.	Improve communication from UK Government with the devolved administrations and local authorities. Ensure roles and responsibilities are clearly defined with regards to digital infrastructure deployment including establishing MoU agreements with each local authority's digital champion (once established), like those in place between BDUK and the devolved administrations for Project Gigabit.
R4.	Greater consideration for any future digital projects or pilots should be given to the different stakeholders responsible for the planning and street works processes in the devolved administrations so that all have the ability to participate with central government initiatives.
R5.	Consider how more accurate, granular information can be shared with local authorities and the general public on planned public interventions to reduce the burden on local authorities who are often the first point of contact for enquiries.
R6.	Work with local authorities and industry to develop and implement a clear communication strategy to raise greater awareness of the benefits of fixed and mobile digital connectivity for wider distribution by digital champions internally within local authorities. This should be cascaded down to all departments within a local authority responsible for managing digital infrastructure including planning, highways, and economic development teams as well as being promoted by senior leadership to ensure there is consistent messaging with regards to the benefits.
R7.	A standard guidance document should be developed by DSIT in collaboration with the LGA which can be adopted by Councillors to help improve the overall awareness of the benefits of all digital connectivity, the impact of deploying both fixed and mobile digital infrastructure within their communities and the differences between the technologies being deployed.
R8.	Conduct research to establish how many Local Authorities have digital champions in place, capturing details of where this role sits within the organisation, job description and grade to inform how greater consistency can be achieved.

INDUSTRY

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| R9. | Telecom operators should consider taking a similar digital champion approach as local authorities to aid communication and reduce barriers. |
| R10. | Telecom operators should work with local authorities to develop clear and consistent communication plans for engagement with all stakeholders including members of the public during the planning process. Communications should highlight the benefits of digital connectivity similar to Mobile UK's 'Live Better Connected' programme ⁷ as well as why the technology is needed. |
| R11. | Telecom operators should provide education to planning authorities on how networks are built, the infrastructure required, and any design constraints so that planning authorities have a better understanding on why certain site locations are chosen in the network design process. |

LOCAL AUTHORITIES

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| R12. | Ensure planning and highways teams are sufficiently knowledgeable regarding the latest planning legislation including the recent changes made to the ECC and permitted development rights relating to digital infrastructure deployments. These teams should also be aware of the latest guidance and best practice documentation available such as BDUK's Barrier Busting Handbook. |
| R13. | Develop a proactive approach across all departments towards digital infrastructure deployment and ensure all local policies and plans are aligned with national objectives. This includes ensuring local policies regarding a drive to reduce street clutter is balanced against the need for digital infrastructure. |

⁷ Live Better Connected > Introduction | Mobile UK



Theme 2: Planning

Planning

Consistency of planning could be improved across nations and regions

Universal feedback was that planning matters remain inconsistent across local authorities. One key issue is that planning is a devolved matter, leading to differences between the four UK nations in planning policies. This has a potential negative impact on approvals, and difficulties providing accurate guidance to both industry and their subcontractors who are typically working across different geographies and national borders.

It was noted by industry that the recent reforms made to the ECC through the PSTI Act 2022⁸, around the reuse and sharing of infrastructure, was a positive way forward. However, several specific issues were noted with regards to permitted development rights in Scotland and the need to remove the restrictions around building new sites in designated areas and regarding access tracks.

Another example noted was Northern Ireland where the permitted development rights of way planning policy was considerably out of date and misaligned when compared to the rest of the UK. In addition, Northern Ireland also does not have a prior approval process leading to long planning approval times. There was also concern that this position would be unlikely to change even once the Executive was restored as there would be a significant backlog of more urgent legislation to be addressed before issues relating to planning would be resolved. Industry also highlighted the risk this presented to such programmes as the SRN.

However, this disparity is not limited to devolved nations, and equally applies to differences in the planning approach taken by local authorities within each nation.

Planning application costs within some local authorities are often high. There are also variations between local authorities on the guidance provided to telecoms operators, how applications are processed, the associated planning fees, and more importantly, the planning application success rate. Planning is also seen as an area where a lack of subject specific knowledge regarding digital infrastructure can have a negative impact on the process, with planning officers often poorly informed.

Alongside this, advice provided to applicants by planning authorities as part of the planning, or pre-planning application process is often inconsistent and there is a perceived lack of effective feedback around why planning applications have been rejected and/or what is required for a planning application to be more likely to be approved.

Telecom operators consistently commented that there were several challenges with the current pre-application planning process. This included inconsistencies in the approach adopted by planning authorities, the fees charged, and the usefulness of the advice given. Some telecom operators stated that while they were prepared to pay for pre-planning guidance, at present, the advice provided by some planning authorities was too inconsistent and / or minimal to help them with their planning applications. Some planning authorities seemed to suggest that the pre-planning application was a 'fast track process', however feedback from

⁸ <https://www.legislation.gov.uk/ukpga/2022/46/contents/enacted>

telecom operators stated they wanted more focus on quality. Telecom operators commented that more central guidance was needed for local authorities on the fees and outputs relating to any pre-application process.

Overall, it was felt that a lack of joined up working at national strategy level was partly responsible for many of the issues cited with the planning process, with current UK Government rules providing mostly guidance, rather than regulation, rendering them ineffective at worst, or inconsistently applied at best.

Planning should consider wider local benefits

It was noted that most planning applications are currently processed on case-by-case basis with planning officers often not giving any consideration to the wider context of the infrastructure within a planning application and why the site is needed.

There is currently no incentive within local authorities for planning officers to ensure they maintain a good level of understanding of mobile infrastructure technologies and their deployment requirements.

Feedback was also provided suggesting planning officers within local authorities generally do not understand digital connectivity well enough and are unaware of the likely increase in demand for sites, or why the workload around this will increase, not least due to the anticipated resistance given the higher density and visual impact of infrastructure. This includes a lack of knowledge or understanding as to why different

infrastructure is required in different places (macro vs small cells) or the need to consider both coverage and capacity within mobile networks, which can drive the need for additional sites. It was noted that public concerns regarding 5G rollout can also influence some planning applications and possible rejection to avoid the negative feedback from Councillors and the communities they represent. Telecoms operators also commented that some planning authorities had difficulty understanding the current planning regulation and how this impacted digital infrastructure deployment particularly given the number of recent changes that have been made to the ECC and permitted development rights.

There were also comments from local authorities that as telecoms operators do not generally submit planning applications, but rather these are submitted by their sub-contractors, and with planning applications also working off a 'reference number,' it meant that local authorities are often unclear about who the actual planning application is from.

National planning guidance needs to keep pace with technology developments

It was noted that planning guidance such as the National Planning Policy Framework⁹ published by UK Government is now outdated and does not reflect the requirements of recent technology advances. Industry commented that guidance needed to be updated to better reflect and accommodate the requirements of all technologies (both fixed and mobile) as well as being updated

⁹ National Planning Policy Framework - GOV.UK (www.gov.uk)

to capture advancements in certain technologies. For example, 5G masts are likely to be deployed at a higher density than older technologies, with larger cabinets needed to accommodate the necessary equipment. In addition, 5G rooftop sites often require larger footprints in order to comply with ICNIRP safety requirements.

WEST MIDLANDS 5G

WM5G has led discussions to find an appropriate balance between the economic and social benefits of 5G infrastructure and its visual impact. It has advised all parties on adhering with the principles of the NPPF, moving from conflict to collaboration, through improved communication and a willingness to compromise.

WM5G has encouraged the MNOs to comply with best practice, including sharing their plans with planning departments and committees. MNOs pre-consult with planning departments on all individual planning applications and continue the dialogue to resolve any controversial applications.

This has led to a speedier roll-out and lower attrition in the processing of planning applications, bringing the benefits of 5G to the region earlier.



Planning resources are constrained

Local authorities acknowledged that the current planning process can appear too long and complicated. However, the feedback provided was that industry often do not engage with local authorities prior to submitting applications. This can also result in the best sites often not being chosen due to operators not using local knowledge available within local authorities. A consequence of this is that local authorities cannot plan workloads for when planning applications will be submitted and the required processing time.

Both local authorities and telecom operators recognised that planning authorities do not have the internal resource to deal with planning applications and highlighted concerns about the target

timescales for the approval of full planning applications being at risk. In some cases, telecom operators were already seeing these delays with planning determinations taking 5 to 7 months due to lack of resource to deal with the volume of planning applications. This was further compounded in some rural local authorities where there had been an increased volume of planning applications as a result of the SRN programme but also large planning applications being submitted by wind farm developers. There was also concern that in the future this was also likely to impact urban local authorities due to an increase in small cell deployments.

Importantly, it was noted in feedback from local authorities that there is an imperative for change due to looming connectivity targets partly being driven by Project Gigabit and the subsequent increase in planning applications being received, but no additional resources being available to deal with such requests.

Better feedback required on planning rejections

In some areas there is currently a high planning application rejection rate. Both local authorities and industry agreed that feedback on why applications are rejected needs to be improved to establish what needs to be changed. It was felt that both planning authorities and industry need to improve communication to strike balance between the local democratic process, conservation, and providing digital connectivity.

Both local authorities and telecom operators commented that they did not see as much resistance to planning applications for

digital infrastructure such as telegraph poles in rural areas where there was generally less, or no, digital connectivity. One local authority noted that the planning application issues in their area were normally in suburban communities where previous utility and telecoms infrastructure such as landlines had been placed underground and therefore had not been visible.

Communication with the public can ease the planning process

It was noted that more effective and early communications with the public can ease the planning process, with local authorities outlining the benefits of what digital connectivity and the associated infrastructure deployment can bring them. It was noted however, that in some cases infrastructure providers have bypassed the local authority and reached out directly to local communities, which whilst potentially beneficial if done appropriately, removes any opportunity for the local authority to help manage messaging around the need for the infrastructure or new site.

A consistent feedback theme was that the benefits of upgraded / improved digital connectivity should be better publicised to increase support, especially within local communities which are often wary of 5G and do not understand why the increased number of sites are required, especially in more urban and suburban areas or why specific sites have been chosen.

As expected, 5G deployments are still seen as the most controversial, and attract the greatest level of scrutiny, oversight,

and challenge which if not addressed, could impact the ability to achieve the UK Government targets for mobile coverage outlined within their recent Wireless Infrastructure Strategy. There is a need for the benefits of digital connectivity to outweigh visual or other concerns to enable the public to be more accepting of planning applications and infrastructure deployments in their area.

Updated, more aligned planning guidance would help accelerate deployment

There was a general consensus amongst local authorities that there needed to be more best practice guidance for planning applications including what an 'ideal planning application' should look like, and the information it should contain which could be consistency applied across local authorities.

Planning guidelines need to be strengthened to more clearly outline the information required for planning applications relating to all digital infrastructure, for example boundaries, site access, coverage / capacity maps etc. This should be simplified into accessible content and an outline process, for example a "dummies guide", which can then be consistently applied across local authorities and industry.

It was also noted that direct communication with telecom operators, not just with industry agents or infrastructure build partners, would be beneficial and would provide both sides with the opportunity to understand the wider context surrounding planning applications.

Of primary note was the feedback that planning guidance has not been updated to sufficiently incorporate digital infrastructure requirements, in particular 5G, and the planning process does not take into account the benefits of digital connectivity. An interesting example was provided in the comparison between the electricity network and the volume and scale of pylons located across the UK versus mobile phone masts which do not seem to carry the same consideration with planners or the general public despite, being categorised as Critical National Infrastructure.



Conclusions

- **CONSISTENCY OF PLANNING COULD BE IMPROVED ACROSS NATIONS AND REGIONS:** the most significant feedback received from both industry and local authorities suggested there was a high level of variability in planning processes and the advice given to telecoms operators regarding their planning applications from local authorities. With regards differences in planning across the nations permitted development rights in Northern Ireland were outdated compared with England, Wales and Scotland and the lack of prior approval process preventing the deployment of digital infrastructure at pace.
- **PLANNING SHOULD CONSIDER WIDER LOCAL BENEFITS:** planning officers generally lacked sufficient understanding of digital connectivity, how networks are built, and the benefits these networks provide to their local community. Several telecom operators felt local authorities approached digital infrastructure planning without alignment to national policies regarding digital connectivity.
- **PLANNING GUIDANCE NEEDS TO KEEP PACE WITH TECHNOLOGY DEVELOPMENTS:** a lack of knowledge within planning authorities about the different types of technology being deployed and their requirements and constraints was leading to planning applications being rejected.
- **PLANNING RESOURCES ARE CONSTRAINED:** Both local authorities and industry recognised that planning authorities do not have the internal resource to deal with planning applications relating to digital infrastructure leading to lengthy timelines as well as concerns that planning resources within local authorities will be an increasing issue as the pace of digital rollout increases.
- **BETTER FEEDBACK REQUIRED ON PLANNING REJECTIONS:** Both local authorities and industry agreed that feedback on why applications are rejected needs to be improved to establish what needs to be changed and improved by both planning officers and industry.
- **COMMUNICATION WITH THE PUBLIC CAN EASE THE PLANNING PROCESS:** Benefits of upgraded / improved digital connectivity should be better publicised to increase support, especially within local communities which are often wary of certain technologies such as 5G and do not understand the requirement for an increased number of sites.
- **UPDATED, MORE ALIGNED PLANNING GUIDANCE WOULD HELP ACCELERATE DEPLOYMENT:** Planning officers often have difficulty understanding the current planning regulation, particularly given the number of recent changes that have been made to the ECC. Telecom operators consistently commented that a lack of clear guidance to local authorities on the application of planning regulations relating to telecoms infrastructure was an issue and potentially threatened the 2030 mobile targets outlined in the Government's recent Wireless Infrastructure Strategy. Several local authorities commented that an updated guide to planning regulation would be helpful.

Recommendations

DEPARTMENT FOR SCIENCE, INNOVATION AND TECHNOLOGY	
R14.	As a priority, provide support to update Northern Ireland's planning regulations in relation to telecoms infrastructure including permitted development rights to avoid further misalignment with the other UK nations.
R15.	Review the existing planning process in relation to pre-planning guidance and analyse the current fees being applied by local authorities. Guidance documentation on the pre-planning process should be developed which gives local authorities greater guidance on what constitutes 'pre-planning application' advice as well as outlining an appropriate fee structure.
R16.	Work with local authorities to produce best practice guidance for planning applications including what an 'ideal planning application' should look like and the information it should contain. This will provide further clarity to telecoms operators about what they need to include in an application as well as giving planning authorities greater understanding about what good should look like and what to expect from telecoms operators regarding different technologies.
R17.	Work with the Department for Levelling Up, Housing and Communities to review the National Planning Policy Framework (NPPF) for England regarding the deployment of 'high quality communications' to ensure this is up to
	date and aligns with recent technology changes (such as 5G deployment), and the advice reflects changes for planning applications submitted under the General Permitted Development Order (GPDO). The document should also reiterate to planning authorities the need to determine applications on planning grounds only and should be revised to include the use of local authority public assets for the deployment of digital infrastructure to ensure they are making effective use of publicly owned land and assets as much as possible
SCOTTISH GOVERNMENT	
R18.	Review the Town and Country Planning (General Permitted Development Scotland) Act to ensure this enables digital infrastructure to be deployed at the pace needed in order to meet coverage targets for the SRN and those set out in the Wireless Infrastructure Strategy. Specifically, review the restrictions around building new or replacing / upgrading sites in designated areas. Consider removal of restrictions around access tracks to make it easier for operators to build and then service and maintain (in particular) mobile mast sites long term.
LOCAL AUTHORITIES	
R19.	Undertake analysis of planning application rejections to understand the reasons for rejection and opportunities for improvements.



Theme 3: Street and Roadworks

Street and Roadworks

Variation in noticing and permitting schemes is the single biggest barrier

The single biggest barrier to deployment in the public highway / footpath is the different noticing and permitting schemes in operation within each local authority which causes additional burden for industry. There are concerns that the impact will become greater given the large amount of street works associated with the rollout of fixed digital infrastructure through an increase of commercial activity by industry deploying fibre as well as through programmes such as Project Gigabit.

Telecom operators expressed a desire for a more uniform national approach with regards to street works and that the current approach was 'too loose'. While schemes such as the Barrier Busting Taskforce were noted as working well, there was a strong desire for more guidance from central government on the scope, scale, and operation of permitting schemes including the fees applied, as well as better education within local authority highway teams on the rights of telecom operators as statutory undertakers.

A specific example of this is that the definitions of work can be vague and can lead to inconsistent inspection approaches being adopted by highway authorities.

In a similar way to comments regarding planning, differences in how each nation deals with street works is a source of frustration and a challenge to all stakeholders, with the need for greater alignment of policies and legislation.

Regulations could better reflect digital infrastructure requirements

There was some feedback from industry that the current monitoring and KPIs associated with notices and permit schemes may not be appropriate for infrastructure deployment which potentially makes it harder for telecom operators to deploy their networks. In England, the Statutory Guidance for Highway Authority Permit Scheme¹⁰ outlines a set of key performance indicators (KPIs) that were developed by the Highway Authorities and Utilities Committee (HAUC). These are suggested (but not mandatory) for local authorities to adopt, while in Scotland, this process is managed by the Scottish Road Works Commissioner under the NRSWA Code of Practice for Inspections¹¹. There was some feedback from industry that the metrics used to measure performance such as early starts / late starts were not suitable for telecoms infrastructure deployments and not aligned to the wider UK Government goals of providing 85% gigabit coverage by 2025.

Feedback suggests that the current regulations do not sufficiently consider the requirements of digital infrastructure deployment with the works required being seen as similar to other utilities where large-scale new deployments are less common, which can lead to issues with necessary works often running into regulation problems despite not being at fault.

¹⁰ Street works permit schemes - GOV.UK (www.gov.uk)

¹¹ New Roads and Street Works Act 1991 (roadworks.scot)

Coordination could be improved between Highways and Operators

In general, a lack of coordination and engagement between the highways authority and telecom operators regarding planned works and associated timescales causes issues with deployment in the public highway / footpath. It was noted that early engagement and sharing of plans around the street works required would allow plans to be co-developed alongside the local authority resulting in more efficient and coordinated street works.

However, industry feedback acknowledged that they are often reluctant to disclose their overall deployment plans due to commercial sensitivities or the potential for change. This leads to a lack of engagement with local authorities at a more strategic level.

The adoption of flexi-permits

While local authorities recognise telecom operators' desire for more flexible permitting, there was a general reluctance to adopt flexi permits in areas where this was not already in place. Rural areas in particular did not see the need for flexi permits, as in many cases there was reduced scope to adjust plans and the works required often were more disruptive (whole closures of single lane roads) and as such not appropriate for short notice changes. Flexi permits need to be tailored to areas rather than one size fits all as currently used, i.e., differences for urban and rural, whilst also considering permit requirement differences between other utilities.

Local authorities view flexi permits as potentially causing more work due to requests not being properly defined and leading to issues with public communications while industry saw them as a useful tool enabling them to deploy infrastructure at pace and with more flexibility especially for larger scale deployments. Feedback was that the current noticing / permitting system is generally quite restricted in England, while Scotland already operates a mostly flexi noticing system which works well. To support decision making on whether to adopt a flexi system it was felt that there needs to be better understanding of the benefits the system would deliver, and how it would operate.

Despite differing opinions on the need for more flexible permitting approaches, the feedback was that at an operational level engagement, communications, and support requirements regarding street works between local authorities and industry is generally good, albeit there is still a potential lack of understanding of each other's processes, requirements for siting of infrastructure, and resource capacity issues within highways authorities similar to planning.

Infrastructure sharing and coordination of works could be improved

There remains a view that infrastructure sharing and coordination of works with other infrastructure / utilities could be improved to reduce disruption and allow greater efficiency. For example, deployments can be disrupted due to issues with previous work which are still ongoing, or where there are outstanding concerns regarding quality or safety of subcontractors.

A lack of standards

It was also noted from feedback that there is a perceived lack of standards or detail regarding what is considered as acceptable in terms of reinstatement quality, and timeframes, which has resulted in local authorities questioning the mixed standards of work from subcontractors. This has led to different inspection processes being adopted in different regions by local authorities, and a differing understanding by industry of what will be required of them in any given area.

This has the potential to be a significant barrier to the deployment of digital infrastructure due to highways authorities cancelling permits for telecoms operators or requiring remedial works to be completed to address defective reinstatements, leading to deployment delays and additional costs

Awareness raising activities could help with this, alongside opportunities for a more collaborative approach between all parties.

A good example of where work has been successful in this area is the introduction of the Street Manager service which was created as a single source of accurate, up to date and open data on road and street works with the vision of transforming the planning, management and communication of street and road works to ultimately minimise disruption and improve journeys for the public.

ONE.NETWORK, OPENREACH & JAG UK FLEXI PERMIT TRIAL

The trial focussed on small scale civils activity involving large volumes of minor works on Type 3 and 4 streets. This is typical when deploying digital infrastructure. All passive traffic management methods were trialled successfully, up to and including footway closures and give and take.

The trial helped demonstrate that real world benefits can be achieved using flexi-permits, with improvements in processes and an overwhelmingly positive experience for Openreach, its contractors and the highway authorities involved, all without compromising the needs of travelling public and residents.

The trial was seen as a real success, winning the Project of the Year at the Street Works UK Awards 2021.

Conclusions

- **VARIATION IN NOTICING AND PERMITTING SCHEMES IS THE SINGLE BIGGEST BARRIER:** for deployment in the public highway / footpath across local authorities which causes additional burden for industry.
- **REGULATIONS COULD BETTER REFLECT DIGITAL INFRASTRUCTURE REQUIREMENTS:** the current monitoring and KPIs associated with notices and permit schemes may not be appropriate for digital infrastructure deployment.
- **COORDINATION COULD BE IMPROVED BETWEEN HIGHWAYS AND OPERATORS:** early engagement and sharing of plans around street works would allow plans to be co-developed alongside the local authority and other utilities resulting in more efficient and coordinated street works.
- **THE ADOPTION OF FLEXI-PERMITS:** there are polarised views with a reluctance from local authorities and support from industry for their adoption.
- **INFRASTRUCTURE SHARING COULD BE IMPROVED:** infrastructure sharing and coordination of works with other infrastructure / utilities could be improved to reduce disruption and allow greater efficiency.
- **A LACK OF STANDARDS:** feedback clearly suggested that there is a requirement for a National (UK wide) street/ roadworks standard. The systems within the devolved nations are similar similar but can often use different terminology and slightly differing specification, creating confusion, misinterpretation, and ultimately more work. Standard pricing should also be set ensuring industry pays an agreed fair market rate.

Recommendations

DEPARTMENT FOR SCIENCE, INNOVATION AND TECHNOLOGY

- R20.** Work with DfT to further promote the benefits to local authorities of flexible permits including publicising any future planned trials by DfT of these schemes as a way to increase wider adoption of flexi permit schemes.

DEPARTMENT FOR TRANSPORT

- R21.** Work with the devolved governments to introduce a more uniform national (UK wide) approach to managing street works. This should reflect the different types of digital technology being deployed to better manage large-scale infrastructure deployments. This should consider best practice from each nation on how they operate their notice and permitting schemes, and how this can be applied more universally across the UK.
- R22.** Review KPIs for street/roadworks that are being monitored by highway authorities and analyse KPIs at a national level to understand the variation in statistics being reported and to ensure these remain appropriate for large-scale deployment of new digital infrastructure. Consider if less stringent performance indicators can be introduced to improve the duration and working hours of work and traffic management permitted for telecoms operators.

INDUSTRY

- R23.** Telecom operators should include early engagement with local authorities (both highways and planning), as a standard part of their deployment planning processes to help mitigate and avoid deployment issues, such as having to redesign the network due to planning refusal as well as ensuring alignment with other street works activities.
- R24.** Telecom operators should instigate improvement programmes to enhance the quality of work by their street works subcontractors, including health and safety, planning, and communications. Operators should implement appropriate governance: monitoring, auditing, and site visits to ensure works are being performed to standard, and engagement with local authorities is consistent to ensure high quality within the wider supply chains.

LOCAL AUTHORITIES

- R25.** Investigate the potential benefits of adopting a flexible permit scheme by learning from previous successful trials such as the Joint Authorities Group (JAG), Openreach and Sheffield City Council trial supported by DfT and DSIT. Consider running similar small-scale local trials and consider participation in any future DfT trials regarding flexible permits in order to gain valuable information on future street works policy and how flexible permits can be executed successfully.

An aerial photograph of a cityscape under a clear blue sky. A prominent, tall brick tower with a lattice structure on top stands in the center. To its right is a modern building with a blue facade. In the foreground, there are several large, curved, white-roofed structures, possibly greenhouses or covered walkways, situated on a rooftop or industrial site. The city extends to the horizon with various residential and commercial buildings. A yellow semi-transparent banner is overlaid on the bottom half of the image, containing the title text.

Theme 4: Local Authorities as Landlords and Site Providers

Local Authorities as Landlords and Site Providers

The use of public assets is varied

Regarding the use of public assets for deployment of digital infrastructure, industry noted that getting in contact with the right person within local authorities to discuss assets remains challenging. They also commented that even once a site agreement has been agreed, the ultimate asset owners within local authorities often do not know about, or take an active interest in, agreements to use their assets and the process required for telecoms operators to carry out works and install their equipment.

It was also noted that local authorities often do not have access to all street assets such as lighting columns for deploying equipment due to PFI contracts or in the case of Northern Ireland where these are managed at a devolved government level (Department of Infrastructure). Equally, local authorities often do not have the power to restrict infrastructure deployments due to permitted development rights, however, do have to deal with any local issues this causes.

It was noted that the increased use of standard site agreements for access to public assets is generally good. However, these templates have been modified by some local authorities which means what whilst they are mostly similar, there are slight differences which causes increased workload as it involves further legal checks by telecoms operators. This effectively negates all the work to speed up the process by using standard template agreements. Overall, it was felt that site agreements are still too complicated, restrictive, and expensive to make this an attractive offer to industry for large-scale infrastructure deployment. Some

telecom operators believe public sector assets are still seen by the local authorities as a revenue generator rather than a facilitator to improving digital connectivity and local authorities are less interested in non-financial benefits.

The role of agents as intermediaries

We received comments from telecom operators that market intermediaries such as agents can increase the time and cost involved with site agreements. While some recognised the value of certain agents, and their understanding of the planning process, others questioned the value of uncooperative agents providing advice to local authorities and whether this advice was always in the local authorities' best interest. It was also noted that some agents have success fees based upon the scale of the contracts they negotiate which is not driving the best behaviours and outcomes for the deployment of digital infrastructure. One telecoms operator stated they have previously abandoned work rather than deal with certain agents.

There is a willingness to allow public assets to be used for deployment

There was consensus that increased use of public assets for deployment of digital infrastructure is a good idea, however practicalities need to be better considered. For example, the use of PFI assets can be restrictive and despite efforts by local authorities and UK Government to overcome this, there is still little sign of change from the PFI providers. Key issues identified

were whether the local authority is liable for damage to telecoms equipment it does not own but hosts.

Feedback from local authorities suggested that PFI providers are often not interested in installing digital infrastructure or making changes to their contracts and whilst there is a legal route to remove assets from PFI contracts to allow them to be utilised, the process to do this can often be lengthy and expensive, and leaves the local authority with responsibility to manage and maintain the asset.

Some local authorities have made progress on creating registers that list the type of public assets available for use and details such as power availability. However, many still lack an up-to-date register. Up to date information needs to be available to industry to allow them to consider the assets in their deployment plans.

Local authorities can be reluctant to devote resource to gathering and updating this information as there is a perception that sufficient demand for public assets does not yet exist.


Feedback was also provided that in many cases, senior leaders within local authorities can be unaware of the assets they have and the benefits of using these to host infrastructure to improve digital connectivity, or the potential revenue hosting digital infrastructure can generate, which can then offset initial setup and ongoing operational costs.



PERTH AND KINROSS COUNCIL

As part of the Scottish Futures Trust Infralink Exchange Digital Connectivity Infrastructure Accelerator (DCIA) pilot, Perth & Kinross Council together with the other Tay Cities regional councils (Fife, Dundee City and Angus Councils), is now offering telecom providers access to council assets such as land, buildings, streetlights and CCTV via an online asset management platform. This maps the location of council-owned assets suitable for mobile network equipment and provides a direct route to a contact within the council to negotiate an agreement for use.

A new Telecommunications Policy Statement was developed as the previous policy restricted installation of telecommunications masts on council properties. These actions provide a clear indication of commitment to support deployment of telecommunications equipment to enhance digital connectivity. The Council has also taken steps to streamline internal processes to ensure that deployment requests for mobile infrastructure can be dealt with quickly and efficiently.



Misalignment between local priorities regarding connectivity vs street clutter

There is a drive by some local authorities to reduce street clutter and minimise the number of lighting columns. It was noted that this policy will likely cause significant issues when 5G densification starts to be deployed more widely across areas of the UK and will reduce the ability of mobile operators to plan optimal 5G deployments.

Industry feedback suggested that some local authorities had refused additional feeder pillars and cabinets being installed to support small cells deployments due to a drive locally to reduce street clutter and the visual impact of additional poles. Another example was provided where one local authority had suggested that entire streets including any public assets were unavailable for digital infrastructure deployment due to electric vehicle charging being installed.

Some local authorities stated that there is an requirement to improve awareness of how assets can be used to host infrastructure and to provide best practice on how to do this with more efficient use of space. It was accepted that in some cases engagement between local authorities and industry on use of public assets is improving but it still needed more work to ensure it happens consistently.



Conclusions

- **THE USE OF PUBLIC ASSETS IS VARIED:** poor asset data and complicated, restrictive, and expensive site agreements can often make this an unattractive offer to industry for large-scale infrastructure deployment.
- **THE ROLE OF AGENTS AS INTERMEDIARIES:** Telecom operators questioned the role of market intermediaries such as agents, their cost effectiveness, their fee structure and if the advice they provide to local authorities is always helpful in reaching the best outcome in terms of the successful deployment of infrastructure.
- **THERE IS A WILLINGNESS TO ALLOW PUBLIC ASSETS TO BE USED FOR DEPLOYMENT:** There was consensus that increased use of public assets for deployment of digital infrastructure is a good idea, however practicalities need to be better considered, including the role of PFI contracts and conflicting policies such as the drive to reduce street clutter.

Recommendations

LOCAL AUTHORITIES	
R26.	Ensure accurate asset data is available for industry and internal departments and that any external agents acting on their behalf as intermediaries are focused on the wider benefits that digital connectivity enables over maximising revenue generation from assets.
R27.	Facilitate access to public sector land, rooftops, and other assets such as street furniture, and where possible make some of these assets available as a trial to telecoms operators to test their viability. Local authorities should use the standard templates and pricing agreements previously developed by DSIT as part of the DCIA Pilot.



Appendices

Appendix A

Digital Connectivity Objectives

UK Government

A key element of the **UK Digital Strategy**¹² is the requirement for world-class and secure digital infrastructure which plays a vital role in our daily lives and is the foundation of a thriving digital economy. Every part of the UK needs world-class, secure digital infrastructure that enables people to access the connectivity and services they need - where they live, work or travel. That is why enhancing digital connectivity is Mission Four of the government's **Levelling Up White Paper**¹³. The goal is to ensure that everyone, wherever they live or work in the UK, can access the connectivity and services they need for the ever-digitising world.

These strategies were developed in response to the Future Telecoms Infrastructure Review (FTIR)¹⁴ which was announced in the Government's 2017 Industrial Strategy, with the aim of examining the market and policy conditions that will enable greater investment in future telecoms infrastructure at pace. The Review also addressed key questions that could affect the evolution of the UK's digital infrastructure such as the convergence between fixed and mobile technologies, and the transition from copper to full fibre networks.

UK Government has set an ambition to deliver gigabit broadband to at least 85% of premises by 2025 and to reach at least 99% by 2030 and to support rural communities by ensuring that 95% of the UK landmass has 4G coverage by 2025. Alongside this, the UK Government has now set a stretching new ambition of nationwide coverage of standalone 5G to all populated areas of the UK by 2030.

To help achieve this, a £5 billion **Project Gigabit programme**¹⁵ is being delivered by Building Digital UK (BDUK). To date this has now made over £1 billion of public money available to extend gigabit-capable broadband to some of the hardest to reach parts of the country, and BDUK continues to award a steady stream of multi-million-pound Project Gigabit contracts to broadband suppliers.

The UK Government has also made a commitment that every school across the country will be able to access high speed internet by 2025 and provides the **Gigabit Broadband Voucher Scheme**¹⁶ which offers a subsidy to help people in hard-to-reach communities upgrade their broadband connections.

To support the mobile coverage ambitions, 4G geographic mobile coverage will extend to 95% of the UK's landmass through the **Shared Rural Network (SRN) programme**¹⁷, the £1 billion deal with the mobile network operators announced in March 2020. The programme is on target to deliver by the end of 2025, and further improvements in the more hard-to-reach areas will continue until the start of 2027. Ensuring good mobile connectivity will support the delivery of the Emergency Services Network that will replace the current Airwave service used by the emergency services in Great Britain and transform the way they operate.

The recently published **UK Wireless Infrastructure Strategy**¹⁸ sets out a policy framework to help deliver the UK Government's priority of growing the economy and to ensure the UK benefits from advances in wireless connectivity for the next decade including delivery of 5G and plans for 6G.

¹² <https://www.gov.uk/government/publications/uks-digital-strategy/uk-digital-strategy>

¹³ New Roads and Street Works Act 1991 (roadworks.scot)

¹⁴ <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review>

¹⁵ <https://www.gov.uk/guidance/project-gigabit-uk-gigabit-programme>

¹⁶ <https://gigabitvoucher.culture.gov.uk/>

¹⁷ <https://srn.org.uk/>

¹⁸ <https://www.gov.uk/government/publications/uk-wireless-infrastructure-strategy/uk-wireless-infrastructure-strategy>

This sets out how the UK's strengths in telecoms can be harnessed and developed to ensure that the UK can influence and benefit from the development of 6G in a way that meets the future connectivity needs of people, businesses and public services.

Alongside these strategies and targeted interventions, in August 2020 the UK Government asked Which? (the UK's consumer champion), the Confederation of British Industry (CBI) and the Federation of Small Businesses (FSB) to convene the **Gigabit Take-up Advisory Group (GigaTAG)**¹⁹. The GigaTAG set out to develop a set of recommendations to help support consumer and business migration to gigabit-capable networks and the services they deliver, including those which are gigabit-capable, as soon as possible with the aim to help ensure that the wide-ranging benefits of these networks are realised.

Scottish Government

Despite telecoms being a reserved matter to UK Parliament, **Scotland's Digital Strategy**²⁰ sets out plans for ensuring that digital is at the heart of inclusive sustainable economic growth, public services reform, and creating the future workforce. It also recognises the profound challenges that digital poses for the nature of work, for society, and the myriad of local economies within Scotland.

Ensuring Scotland is a fully digitally inclusive nation in which the benefits of technology are available to all, formed a key part of the Digital Strategy and several initiatives were established to ensure that no one is left behind.

First of these is to deliver broadband coverage for all and maximise gigabit investment in Scotland through the £600 million investment in the **Reaching 100% (R100) programme**²¹ and

through collaboration with commercial providers and the UK Government.

Alongside this, and recognising the importance of good mobile coverage, work is also ongoing to improve rural 4G mobile coverage and set the right conditions to encourage investment through continued investment in infrastructure and collaborative working with the UK Government. As part of this, the **4G Infill Programme (S4GI)**²² is a £28.75 million initiative delivering 4G infrastructure and services in up to 55 mobile "notspots" in rural and remote parts of Scotland.

Welsh Government

Digital connectivity and telecommunications are still reserved matters for which the Welsh Government is not responsible and receives no devolved funding. However, Welsh Government has committed to use the levers at their disposal to support the public sector, businesses and homes in Wales to receive the connectivity they need to engage in digital activities in support of their wider **Digital Strategy for Wales**²³.

The Welsh Government has also developed **Future Wales: The National Plan 2040**²⁴ which seeks to address the key national priorities through the planning system, and which sets out 36 policies including regional connectivity, supporting digital communication and the creation of 8 Mobile Action Zones across Wales. The Welsh Government has also established their own barrier busting taskforce focused on making Wales a more attractive place to invest in all forms of digital infrastructure and are working on addressing a number of barriers through this taskforce²⁵.

¹⁹ <https://www.which.co.uk/policy-and-insight/article/about-the-gigabit-take-up-advisory-group-adZXL5S9najj>

²⁰ <https://www.gov.scot/publications/a-changing-nation-how-scotland-will-thrive-in-a-digital-world/>

²¹ <https://www.scotlandsuperfast.com/>

²² <https://www.gov.scot/publications/scottish-4g-infill-programme-progress-update/>

²³ <https://www.gov.wales/digital-strategy-wales.html>

²⁴ Future Wales: The National Plan 2040 – Planning Aid Wales

²⁵ Barrier Busting Taskforce: report [HTML] | GOV.WALES

Northern Ireland Executive

As with the other devolved governments, telecommunications are a reserved matter for which the Northern Ireland Executive is not responsible and therefore receives no direct devolved funding. The **Industrial Strategy for Northern Ireland**²⁶ (currently out for consultation) does, however, highlight the need for continued investment in digital connectivity as a key enabler of economic and social development. The strategy includes the objective of becoming Europe's best-connected region for broadband by 2030. This will include extending broadband coverage via interventions such as **Project Stratum**²⁷, the £197 million programme to deliver improved broadband access to 85,000 premises.

In addition to direct investment in projects, the **Mobile Action Plan for Northern Ireland**²⁸ was published in 2022, recognising the growing importance of mobile technologies and the need to create the right environment to encourage further investment in the rollout of mobile infrastructure. This action plan establishes the steps needed to overcome several key barriers around: the perception of mobile technology; planning; cost; public asset availability and keeping pace with technological developments.

Appendix B

Relevant Telecoms Legislation

The main legislation relating to the deployment of digital infrastructure in the UK is the Electronic Communications Code, permitted development rights, and street works legislation. While telecommunications are a reserved power, meaning that overall policies and targets are set by the UK Government, some areas of legislation relevant to the deployment of digital infrastructure such as planning, street works and building regulations are devolved responsibilities and can vary slightly in each nation.

The Electronic Communications Code

The Electronic Communications Code²⁹ (ECC or 'the Code') is set out in Schedule 3A of the Communications Act 2003³⁰ and is the main law governing the rights of telecom operators to construct and install communications networks on both private and public land (streets) across the UK. It also conveys certain immunities from the Town and Country Planning and New Roads and Street Works Act.

The Code was first introduced across the UK in 1984 and was amended in 2017 through the Digital Economy Act 2017³¹ with the aim to make it easier for telecoms operators to deploy infrastructure. Further reforms have since been made to the Code through the Product Security and Telecommunications Infrastructure Bill (PSTI) Act 2022³² which includes a number of measures to reduce barriers to deployment.

Not all digital infrastructure requires planning permission. The type of planning permissions required is defined by the type of

²⁶ <https://www.economy-ni.gov.uk/sites/default/files/consultations/economy/industrial-strategy-ni-consultation-document.pdf>

²⁷ <https://www.economy-ni.gov.uk/articles/project-stratum-introduction#toc-1>

²⁸ <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Mobile-Action-Plan-for-NI.pdf>

²⁹ The Electronic Communications Code (Conditions and Restrictions) Regulations 2003 (legislation.gov.uk)

³⁰ Communications Act 2003 (legislation.gov.uk)

³¹ Digital Economy Act 2017 (legislation.gov.uk)

³² Product Security and Telecommunications Infrastructure Act 2022 (legislation.gov.uk)

equipment being deployed, its size, and location. In addition, the exact rules regarding permitted development rights vary across the devolved nations as outlined below.

Permitted Development Rights

The Town and Country Planning (General Permitted Development) Order 2015 (the "GPDO 2015")³³ is a Statutory Instrument that grants planning permission to telecom operators for certain types of development. Such development is then referred to as permitted development. Part 16 of Schedule 2 of the GPDO 2015 applies to England only and allows the installation, alteration, upgrade, or replacement of any electronic communications apparatus (such as masts, antenna, cabinets) by or on behalf of an electronic communications code operator without planning permission. However, there are exceptions, such as conservation areas where planning permission is still required.

Telecom operators deploying infrastructure under permitted development rules are required to submit a 28-day notice period to the local planning authority, known as a Regulation 5 notice (under the Electronic Communications Code).

Although the basic structures of the four planning systems used across the UK are similar, there are differences in the detail on what constitutes permitted development as well as some key definitions.

Prior Approval

Some telecom infrastructure may be considered permitted development but is subject to 'prior approval' and requires the local planning authority to assess whether the proposed infrastructure meets the conditions outlined under the permitted development

rules without having to undergo full planning permission. Local planning authorities have 56 days to respond to prior approval applications and can only object to the infrastructure on the grounds of siting or appearance, including whether the visual impacts have been minimised as much as practically possible. Local Authorities within Northern Ireland do not operate a prior approval process.

Full Planning

If the telecoms infrastructure deployment is not covered by permitted development or prior approval, then a full planning application must be submitted. Local planning authorities in England, Wales and Scotland are expected to make a determination on planning applications within a statutory period of either 8 weeks for straightforward planning applications, 13 weeks for large or complex applications and 16 weeks for applications subject to an Environmental Impact Assessment (EIA).

Planning authorities will determine if each planning application is in line with their local plans and the Government's National Planning Policy Framework (NPPF)³⁴.

Local authorities are required to publicise full planning and prior approval applications. The Government's Code of Practice for Wireless Network development in England³⁵ emphasises the importance of consultation and engagement, to ensure the deployment of digital infrastructure is carried out in 'a transparent and appropriate way'.

For telecoms infrastructure requiring full planning, Local Authorities are required to issue a site notice or neighbourhood notification letters as well as include information on their website

³³ The Town and Country Planning (General Permitted Development) (England) Order 2015 (legislation.gov.uk)

³⁴ National Planning Policy Framework - GOV.UK (www.gov.uk)

³⁵ Code of practice for wireless network development in England - GOV.UK (www.gov.uk)

as a minimum with the consultation period to remain open for at least 21 days.

Some local authorities offer pre-planning guidance where a full planning application is required. This offers telecom operators an early view and guidance from a planning authority on information needed to support a planning application and identifying those stakeholders who are likely to be involved in the application process. Most local authorities encourage pre-application discussions and see these as an important part of the planning process to improve the quality of applications and help to reduce the time taken to deal with formal applications. Within Northern Ireland this is called the pre-application discussion (PAD).

Building Regulations

Building work in England is governed by building regulations under the Building Act 1984³⁶ and the Building Regulations 2010³⁷. In December 2022, various amendments were made to the Building Regulations 2010 to ensure delivery of gigabit-capable connections to all new build houses.

As building regulations are a devolved matter, the amendments to the Building Regulations 2010 only apply to England. Wales, Scotland, and Northern Ireland are separately being encouraged by UK Government to follow suit to ensure a consistent policy across the UK.

In addition to the Building Regulations 2010, amendments have also been made recently to the Telecommunications Infrastructure (Leasehold Property) Act (TILPA)³⁸ to make it quicker and more cost effective to provide gigabit connections to multi-dwelling units (MDUs) when landlords do not respond to telecoms

operators requesting access. This includes introducing a faster route for dispute resolution and a revised court process. These amendments to the TILPA Act have already been enacted in England and Wales and are due to come into effect in Scotland later in 2023.

Street Works

Part 8 of the ECC provides designated telecom operators with rights to install their infrastructure on or under public roads and to carry out the necessary street works to do this. Telecom operators (along with other utility companies) are considered 'statutory undertakers' under Parts III and IV of the New Roads and Street Works Act 1991 in England, Wales and Scotland (the NRSWA)³⁹, and under the Street Works (Northern Ireland) Order 1995 (SI 1995/3210) in Northern Ireland⁴⁰.

The NRSWA and associated regulations allow statutory undertakers to carry out street works on public roads without the prior consent of the local highway authority. However, telecom operators are required to give notice to Local Authorities before starting any work.

Most Local Authorities have now introduced permit schemes for street works. These were introduced for England and Wales by the Traffic Management Act (2004)⁴¹ and the Traffic Management Permit Scheme (England) Regulations 2007⁴² which replaced the NRSWA's notification requirements in Local Authority areas operating a permit scheme. In Scotland, the permit scheme for street works is governed under the Transport Scotland Act (2019)⁴³ and is managed by the Scottish Road Works Commissioner who is an independent official who oversees the planning, co-ordination, and quality of works on roads across Scotland.

³⁶ Building Act 1984 (legislation.gov.uk)

³⁷ The Building Regulations 2010 (legislation.gov.uk)

³⁸ Telecommunications Infrastructure (Leasehold Property) Act 2021 (legislation.gov.uk)

³⁹ New Roads and Street Works Act 1991 (legislation.gov.uk)

⁴⁰ The Street Works (Northern Ireland) Order 1995 (legislation.gov.uk)

⁴¹ Traffic Management Act 2004 (legislation.gov.uk)

⁴² The Traffic Management Permit Scheme (England) Regulations 2007 (legislation.gov.uk)

⁴³ Transport (Scotland) Act 2019 (legislation.gov.uk)

Permit schemes require statutory undertakers to book time on the street and apply to the local highways authority to obtain permission via a permit before any work is started. It is down to each Local Authority to decide which roads fall within a permit scheme; those roads not covered by a permit scheme will still require telecom operators to submit a notice to the Local Authority before commencing work.

When undertaking any street work, statutory undertakers have a responsibility under Section 70 and 71 of the NRSWA to reinstate any roads or streets back to their original condition as soon after the completion of the work as reasonably practicable. Local highway authorities are responsible for inspecting street works once completed and also have the power to take action against non-compliance if the reinstated work has not been completed to an acceptable level. This may require telecom operators to carry out remedial work.

The permitting schemes in operation by Local Authorities throughout the UK can vary. While all permit schemes are based on the legislation above, they are designed to suit the needs of each Local Authority in managing their road networks as opposed to the needs of statutory undertakers to maintain, upgrade, and expand their networks. Permit schemes are also supported by guidance from the Department for Transport (DfT) including 'Specification for the Reinstatement of Openings in Highways⁴⁴' and the 'Street Works Toolkit⁴⁵'.

Before granting permits to telecom operators, local highway authorities can apply conditions to the permit and charge fees for permit applications to recover their costs for running their permitting scheme. Where Local Authorities do charge fees, guidance from DfT encourages them to look at ways to incentivise

the process such as introducing a fee discounts mechanism.

Road Traffic Management

In some cases, street works activity may need telecom operators to liaise with the Local Authorities to obtain formal permission for traffic management such as obtaining a Temporary Traffic Regulation Order (TTRO) for a road closure. The process for temporary traffic restriction in England, Wales and Scotland is set out in the Road Traffic (Temporary Restrictions) Procedure Regulations, 1992⁴⁶ and for Northern Ireland in the Road Traffic Regulation (Northern Ireland) Order, 1997⁴⁷. In addition, the Safety at Street Works code of practice of 2013⁴⁸ also sets out the legal and safety requirements for a statutory undertaker performing street works.

Details of the traffic management scheme are required to be submitted with an application for the street works permit by telecom operators. However, if TTROs are also required, then these must be applied for separately to the street works permit.

When granting a TTRO, at least seven days before making the order, a local authority is required to publish notice of their intention to make the order in one or more local newspapers and inform the police, and again within 14 days after making the order. Fees associated with TTROs are normally passed onto operators and consist of an application fee as well as additional costs based on the number of roads closures needed in an area, the type of restriction required, and the duration of any temporary restrictions.

⁴⁴ Specification for the Reinstatement of Openings in Highways - Fourth edition (publishing.service.gov.uk)

⁴⁵ Street Works Toolkit - GOV.UK (www.gov.uk)

⁴⁶ The Road Traffic (Temporary Restrictions) Procedure Regulations 1992 (legislation.gov.uk)

⁴⁷ The Road Traffic Regulation (Northern Ireland) Order 1997 (legislation.gov.uk)

⁴⁸ Safety at street works and road works - GOV.UK (www.gov.uk)

Planning Rules in Devolved Administrations

Although the basic structures of the four planning systems used across the UK are similar, there are differences in the detail on what constitutes permitted development as well as some key definitions.

In Wales, permitted development rights were reformed in 2019⁴⁹ to allow the installation of new ground-based masts up to 25 metres in unprotected areas and up to 20 metres in protected areas. Further changes were also made in 2020⁵⁰ aimed at reducing planning restrictions associated with small cell antenna and to enable more effective deployment of 4G and 5G technology on buildings and street furniture.

The Welsh Government has also produced guidance on the planning procedures to follow when assessing telecommunications proposals. The Technical Advice Note 19 (TAN 19): Telecommunications⁵¹ is one of a series of TANs which supplement Planning Policy Wales (PPW)⁵². The document is aimed at local planning authorities in Wales when assessing telecoms operators' development plans. The TAN 19 contains guidance on permitted development rights, prior approval and developments requiring an application for full planning permission as well as guidance on the consultation process regarding planning applications.

A code of best practice on mobile phone network development in Wales⁵³ also provides guidance on the siting and design of masts and consultation requirements.

In Scotland, permitted development rights were reformed in 2020⁵⁴ to allow ground-based mobile masts up to 30 metres outside designated areas (such as conservation areas and national parks) as permitted development, subject to prior approval as well as

increasing the size limits for antennas and other equipment on buildings, equipment cabinets and on buildings.

The Scottish Government has also produced a guidance document for local planning authorities, and telecoms operators. The Planning Advice Note: PAN 62 Radio Telecommunications⁵⁵ complements the National Planning Policy Guideline on Radio Telecommunications (NPPG19) and provides advice on the process of site selection, network design, and reducing visual impact as far as practicably possible.

In Northern Ireland, permitted development rights were updated in December 2020⁵⁶. New ground-based mobile masts are not classed as permitted development unless they replace an existing mast. Replacement or alternations to existing masts is permitted as long as the installation, or replacement does not exceed 25m of the existing mast permitted height.

The Northern Ireland Government has recognised that the availability and access to digital infrastructure is essential for the economy and that various barriers need to be addressed in order to facilitate the deployment of networks. Based on this, they have developed a Mobile Action Plan for Northern Ireland⁵⁷ which identified 8 key areas (including planning) that needed to be addressed in order to facilitate better conditions for the deployment of digital infrastructure.

⁴⁹ The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2019 (legislation.gov.uk)

⁵⁰ The Town and Country Planning (General Permitted Development) (Amendment) (No. 3) (Wales) Order 2020 (legislation.gov.uk)

⁵¹ Technical advice note (TAN) 19: telecommunications | GOV.WALES

⁵² Planning policy Wales | GOV.WALES

⁵³ Code of Best Practice on Mobile Phone Network Development for Wales (gov.wales)

⁵⁴ The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Amendment Order 2020 (legislation.gov.uk)

⁵⁵ Planning+Advice+Note+62+Radio+Telecommunications.pdf (www.gov.scot)

⁵⁶ The Planning (General Permitted Development) (Amendment) Order (Northern Ireland) 2020 (legislation.gov.uk)

⁵⁷ Mobile Action Plan for Northern Ireland (economy-nigov.uk)

Appendix C

Study Participants

We would like to extend our thanks to the following organisations who participated in this study:

LOCAL AUTHORITIES

Belfast City Council

Cambridgeshire County Council

Cardiff Council

Cheshire West and Chester Council

Connecting Devon and Somerset

Glasgow City Council

Highland Council (Highlands & Islands Enterprise)

Liverpool City Region Combined Authority

Monmouthshire County Council

North Ayrshire Council

Perth & Kinross Council

West Midlands Combined Authority

TELECOMS INDUSTRY

Cellnex

Cityfibre

CTIL

Lothian Broadband

Mobile UK

Ogi

GOVERNMENT & REGULATORY

Department for Science, Innovation and Technology (DSIT)

Welsh Government

Scottish Government

Northern Ireland Executive

Ofcom

ADVISORY BODIES

Local Government Association

ADEPT Digital Connectivity Working Group

Appendix D

Local Government Structure

- County councils cover the whole of the county and provide the majority of public services in their particular area.
- District councils, which may also be called borough councils or city councils if the district has borough or city status, cover a much smaller area and provide more local services.
- Metropolitan districts are unitary authorities; they can be called metropolitan district councils, metropolitan borough councils or metropolitan city councils.
- Unitary authorities can be city councils, borough councils, county councils, or district councils.
- Each London borough is a unitary authority. However, the Greater London Authority (GLA) provides London-wide government and shares responsibility for certain services.
- In both Wales and Scotland there is a single tier system of local government providing all local government services.
- In Northern Ireland there are elected local borough, city and district councils which provide services such as waste disposal, street cleaning and recreation; however the majority of services are the responsibility of other organisations.

	TWO TIER AREAS		SINGLE TIER AREAS			DEVOLVED NATIONS		
Responsibility	County Council	District Council	Metropolitan District	Unitary Authority	London Borough	Scotland (Unitary Authority)	Wales (Unitary Authority)	Northern Ireland (Borough, City and District councils)
Planning	✓ (Strategic)	✓ (Local)	✓	✓	✓ (shared with GLA)	✓	✓	✓
Highways and/or Roads	✓		✓	✓	✓ (shared with GLA)	✓	✓	

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