



Welsh Government consultation on the National Development Framework 2020-2040

Vodafone UK response - November 2019

Overview

Digital connectivity is crucial to Wales' present and future economic success. We are, therefore, pleased to see the National Development Framework recognise digital infrastructure as an important contributor to the future growth and development of Wales.

We believe the same importance should be given to digital infrastructure as more traditional infrastructure, such as roads, rail, water or energy. When looking at major projects in these areas, a great deal of focus is given to ensure the policy and regulatory environment helps to deliver them. We need the same for digital.

To achieve this, we need a regulatory and policy framework that encourages investment in digital infrastructure. This must recognise both the high costs associated with building digital infrastructure for fixed and mobile, and the competitive environment. For example, we have seen prices in mobile come down by 4% since 2014 while data usage has gone up by 214% over the same period.

As a leading provider of digital services, Vodafone welcomes this consultation. Much has been achieved in terms of building digital infrastructure, which has become crucial to individuals, communities and businesses across Wales over the last decades, including through Vodafone's multi-billion-pound investment. Today the vast majority of people are living and working in areas with 4G coverage and Vodafone has launched 5G in Cardiff and Llandudno. More broadly, the industry has a strong record of working together to overcome challenges and private sector investment has delivered significant improvements.

We have seen progress from the Welsh Government on producing its Mobile Action Plan, however if we are to build for the future and keep Wales competitive on the global stage, we need a fundamental rebalancing of the regulatory framework within which we do this. Ultimately we need a regulatory and policy environment, incorporating crucial elements such as planning policy, which incentivises investment in infrastructure. We are committed to working closely with the Welsh Government to build the framework we need through direct intervention or a removal of barriers.

Vodafone's investment and digital network in Wales

Over the last few years, Vodafone's mobile coverage across Wales has improved dramatically because of significant and sustained investment. We have invested billions in our UK network and services to improve coverage. We are committed to continuing to invest our network to meet the growing demand for mobile connectivity, especially mobile data and deliver 4G to the vast majority of the Welsh population.

5G is set to revolutionise how we live and work. It will allow people and businesses across Wales to enjoy ultra-fast connection speeds, low latency and a more reliable network performance than ever bringing extensive societal and economic benefits. We already have live 5G sites across Cardiff, one of our initial seven trial cities, along with a live site in Llandudno.

Building a partnership for investment

Wales needs a policy environment that supports further digital infrastructure rollout, especially in the



more challenging rural areas where it is more expensive to build and operate sites and the return on the investment is lower. We recognise that certain areas of reform will fall solely under the remit of the UK Government, however the Welsh Government are able to support us by exerting its powers to drive change in areas such as planning policy.

We welcome the changes the Welsh Government has made to date, especially regarding the ability to build taller masts under permitted development announced earlier this year. However, policymakers need to go further to support the rollout of the digital infrastructure that Wales needs, as well as bringing planning policy in line with other areas of the UK where additional reform has already taken place.

There are a number of changes in which the Welsh Government have the opportunity to introduce further planning reform to bring in line or go beyond reform being considered in England. This includes:

- On macro sites, the removal of the necessity for Prior Approval in relation to mobile infrastructure on all sites;
- Removing limits on the width and thickness of mast equipment, particularly pole size for the upgrade of sites, allowing for simple pole swaps to support new or swapped antennas to be undertaken through permitted development;
- Complete parity between mobile and fixed line infrastructure in terms of how the Permitted Developments Rights apply;
- Provision for future digital infrastructure is mandated into new housing, retail and industrial developments at the planning stage, and such provision is considered on the same basis as heat, light and water.

These reforms would also play an important role in the success of the recently announced Shared Rural Network (SRN)¹, which has been negotiated between the UK Government, Ofcom and the mobile network operators. SRN will offer an unprecedented opportunity to improve coverage in rural areas, and therefore we would strongly urge the Welsh Government to introduce changes to the planning system. We stand ready to work closely with the Welsh Government on their support for SRN to deliver our shared ambition to improve coverage in those harder to reach rural areas.

We support the points made in Mobile UK's response urging the Welsh Government to consult on revised Permitted Development Rights for deployment of telecommunications in Wales and updating the Code of Practice / Technical Advice Note 19. Reform of the planning system in Wales would make it much faster and more certain to deploy the key network equipment needed for the continued rollout of 4G to those areas where this is taking place as well as 5G.

About Vodafone

Vodafone UK connects people, businesses and devices to help our customers benefit from digital innovation. Our services span mobile, fixed line, broadband and the Internet of Things.

Vodafone UK is part of Vodafone Group, one of the world's largest telecommunications companies, with mobile operations in 24 countries, partnerships with mobile networks in 42 more, and fixed broadband operations in 19 markets. As of 30 September 2019, Vodafone Group had approximately

¹ DCMS, *£1 billion deal set to solve poor mobile coverage*, <https://www.gov.uk/government/news/1-billion-deal-set-to-solve-poor-mobile-coverage>, accessed 14.11.2019.



625 million mobile customer, 27 million fixed broadband customers and 22 million TV customers, including all of the customers in Vodafone's joint ventures and associates.

Vodafone is the world's largest Internet of Things (IoT) services provider having connected over 85 million devices worldwide. IoT presents an opportunity to transform the way in which businesses and public services operate from autonomous vehicles to smart bins, CCTV and buildings reducing costs and increasing productivity. In Wales, we are investing in a Narrowband-IoT network and working with customers to develop solutions to deliver improved services.

[For more information:](#)

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