Mobile UK comments

Mobile UK welcomes the Mayor's recognition of the importance of mobile connectivity and the need to ensure mitigation measures are taken to avoid reducing mobile connectivity in surrounding areas where development takes place. This is particularly important in the light of recent requests from developers to build up and not out which could, if not managed sympathetically to mobile broadcasting equipment, impact upon existing mobile networks.

Mobile UK also supports the London Plan's proactive policy to support the effective use of the public realm to accommodate well-designed and located mobile digital infrastructure. Street furniture, such as lampposts can be used to host mobile antennae and could become an essential element in the effective roll-out of 5G in the capital. However, the provision of street furniture must be at a rate that ensures the assessment of development proposals for mobile digital connectivity infrastructure considers the wider public benefit resulting from the proposal and balances that with the environmental impact of the proposal. It cannot simply become a revenue raiser for local authorities that would make it uneconomic for mobile operators.

It is also important that Local Authorities ensure their local development plans include policies specifically relating to mobile digital infrastructure connectivity and recognising the wider benefits it brings. It is hoped that the London Plan will be the primary tool for ensuring that digital policies are consistent across Greater London.

Mobile UK also believes that the London Plan should ensure that the phrase 'public realm' does not only refer to street furniture but is also expanded to rooftop sites and the use of existing structures including masts to accommodate well designed and located mobile digital infrastructure.

Mobile communication is part of the UK's critical infrastructure and is integral to people's lives. At the end of December 2016, there were 92 million mobile connections (including 52.4 million 4G mobile subscriptions).1 94% of the adult population has a mobile phone.

Drawing on Ofcom's 2017 Connected Nations report, 99% of premises across Greater London have indoor call & data coverage from all four mobile networks.

The increase in coverage, capability and capacity of mobile networks has led to an explosion in demand for mobile data. 4G is driving greater volumes of data usage. A total of 156 petabytes was sent over all mobile networks in June 2017, a 47% increase over the previous year. The average volume of data consumed per subscriber now stands at 1.9 gigabytes per month up from 1.3 gigabytes in 2016

Improved 4G services and the rollout of 5G has the potential to increase this demand further. It is expected that 5G will form the critical backbone of many of the UK's key services such as e-health, the internet of things and connected vehicles. Mobile networks are the modern-day highways and are critical to the nation's economic well-being. 11. Mobile data use has tripled in the last three years and is expected to increase by a further 700% by 2021. Average mobile subscriber use is predicted to grow to 18 gigabytes per month by 2021 (up from 2.5 gigabytes now).

Mobile operators have played a central role in driving this progress by continually investing in their networks, value-added services, and subscriber acquisition. In the current cycle, mobile operators are investing around £2 billion per annum in new coverage, capacity and capability. In turn, business and consumer customers have shown extraordinary ingenuity in harnessing the power of mobile, to be more creative and productive, to offer new services, and to improve lives.

Page:	Policy SI6 Digital connectivity infrastructure
Section:	9.6.4

The deployment of fibre is critical to the continuing extension and enhancement of the mobile network. Mobile networks today require far more bandwidth and the current infrastructure is rapidly reaching capacity. Fibre forms the backhaul of mobile networks, rapidly moving data between mobile and fixed networks. Fibre rollout is therefore complementary to mobile deployment. Using fibre for mobile backhaul is becoming standard practice in advanced mobile networks.

Fibre will be crucial in the delivery of 5G so it is important to ensure we have a fibre strategy that takes the needs of mobile operators into consideration alongside any broader strategy for the delivery of fibre to homes and businesses.

It is important that decision makers are aware of the importance of fibre for mobile traffic offload and prioritise fibre roll-out to be complementary to mobile infrastructure deployment.

Page:	Policy SI6 Digital connectivity infrastructure
Section:	9.6.6

Mobile UK welcomes the London Plan's view that pan-London guidance and best practice should be developed to increase awareness and capability amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. Mobile coverage needs to be at the forefront of strategy and planning both at a national and local level. Pro-connectivity policies should be woven into Local Plans and growth strategies and linked across local authorities and plan London through the GLA.

To achieve this there must be strong commitment at the local level as well as the London level to work with mobile network operators. Local authorities must also show leadership and include pro-connectivity policies as part of their Local Plans and take a 'joined-up' approach to telecoms provision and planning applications, especially considering local economic development, sustainability, and social inclusion considerations.

A fully integrated approach to housing development where mobile and digital infrastructure is considered is required urgently. Planning and Building Regulations must promote digital infrastructure in developments which would enable more efficient deployment of mobile infrastructure. Mobile UK also believes that the GLA should consider a 'Connectivity Consideration' for all Large Scale Major Developments or redevelopments. Such a requirement would create a new requirement on developers at the outset of a project to consider mobile infrastructure. It would encourage developers to have early engagement with mobile operators as to how best to provide mobile coverage to new developments, particularly in the light of the way the two industries are evolving. The building sector are, quite understandably, using materials that insulate housing better. The mobile sector are using radio waves at ever higher frequencies, in search of more bandwidth to meet increasing demand. Both these factors will make it much harder for a mobile signal to penetrate indoors, and so careful consideration must be given as to how it will be achieved.

Further consideration is required around 'emergency works' or the need for temporary sites. Often mobile network operators are served a Notice to Quit (NTQ) which call on mobile network operators to remove existing infrastructure on new developments with minimal prior notice. Alternative sites are often difficult to find or fail to provide coverage to the original footprint. Even if a suitable site is found it will often result in a break in service as necessary planning permission is sought. In addition, the knock-on effect to other nearby sites can result in cuts to capacity due to the removal of essential network infrastructure or increased traffic to cover the lost equipment.