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BY EMAIL: ndf@gov.wales

Ref: MW/Wales/NDF/001

12 November 2019

NDF Team,
Planning Policy Branch
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

Dear Sir

Arqiva Ltd
Representations to the National Development Framework 2020-2040
Consultation Draft August 2019

On behalf of Arqiva Ltd, we submit a response to the National Development Framework 2020-2040 (NDF) consultation 2019. Our response comprises this letter and the Consultation Response Form.

We welcome the opportunity to provide comment on the NDF which provides an ambitious 20 year vision of what development should take place in Wales and where. Modern Electronic communications should form an integral part of such discussions and it is from this perspective that we make these representations.

Before going into the detail of our representations, we consider it helpful to provide some background information on Arqiva and our important role within the mobile sector. Arqiva is an electronic communications company with its headquarters in Hampshire and other major UK offices currently in London, Buckinghamshire, Northamptonshire and Yorkshire. Amongst other things, Arqiva owns and operates the terrestrial television broadcast network across the UK and a large part of the radio broadcasting networks. Arqiva now has 6 international satellite teleports, over 70 other manned locations, and around 8000 shared radio sites throughout the UK and Ireland including masts, towers and rooftops from under 30 to over 300 metres tall.

The roots of Arqiva therefore stem from our ownership and operation of the entire terrestrial television broadcast network across the UK and 90% of the radio broadcast network. As

owners of large broadcast towers that predate the mobile networks, Arqiva became a major site share company, as the mobile sector developed. As a consequence, we became the first Wholesale Infrastructure Provider and remain the largest in the UK today, being also owners of the largest communications towers.

Our Representations

1. Within the draft NDF document there are various references to superfast broadband and digital connectivity. These include general references (pages 14, 26 & 29) as well as in relation to specific NDF Outcomes – Outcome 1 on page 20 and Outcome 8 on page 21. Superfast broadband has an important role in digital connectivity, but mobile communications have an equal role, especially in remote rural areas prevalent in Wales. For example, mobile communications can provide coverage over wide areas where it is not possible or economic to provide the more restricted superfast broadband. Even where fixed broadband is available, the public should have the competitive choice to select wireless connectivity instead. **It is therefore considered that the NDF would benefit from including reference to mobile communications provision at the points referenced above to emphasise the complementary role of fixed and mobile communications and the benefits of competition.**
2. Policy 6 - Planning in Mobile Action Zones is positive and is supported. **Within the body of Policy 6 and its accompanying text we consider that there should be reference to the important role Wholesale Infrastructure Providers (WIPs) will have in facilitating mobile telecommunications coverage within the Mobile Action Zones.**

This will support the long-standing policy objective of encouraging the deployment of modern communications networks, especially 5G, given their considerable economic, health, convenience and other societal benefits. At the same time, WIPs help minimise the associated potential impacts on features of environmental, ecological, heritage interests as well as aviation safety, with statutory and policy recognition that this is best achieved through encouraging the continued and shared use of existing sites or other suitable structures. For this reason we consider the role of Arqiva in the mobile sector to be central to these often competing objectives.

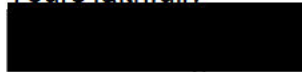
Other Matters

1. We would recommend that the Code of Best practice on Mobile Phone Network Development issued by the Welsh Assembly Government in July 2003 be withdrawn and replaced with current version produced under the banner of Mobile UK. This was published in November 2016 and better reflects the position of mobile communications in terms of operational and technical considerations, network function and a collaborative approach to network provision. The document currently relates to England and would therefore require amendments.

2. We request that Technical Advice Note 19 – Telecommunications issued by the Welsh Assembly Government in August 2002 be withdrawn or replaced as it now provides somewhat dated technical advice.

We trust everything is in order but if clarification is required, please do not hesitate to contact our Matthew Waugh on 07580 821628 or via email at matthew.waugh@arqiva.com.

Yours faithfully

A black rectangular box redacting the signature of the sender.

Arqiva Ltd
Enc:

Consultation Response Form

Your name	Matthew Waugh
Your address	Arqiva Ltd, Trafalgar House, 110 Manchester Road, Altrincham, Cheshire, WA14 1NU
Preferred contact details (email/phone/post)	Email [REDACTED]
<u>Organisation (if applicable)</u>	Arqiva Ltd

1. NDF Outcomes (chapter 3)

The NDF has proposed 11 Outcomes as an ambition of where we want to be in 20 years' time.

- Overall, to what extent do you agree or disagree the 11 Outcomes are a realistic vision for the NDF?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- To what extent do you agree with the 11 Outcomes as ambitions for the NDF?

Agree with all of them	Agree with most of them	Agree with some of them	Agree with none of them	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree with any of the 11 Outcomes, please tell us why:

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2. Spatial Strategy (policies 1 - 4)

The NDF **spatial strategy** is a guiding framework for where large-scale change and nationally important developments will be focused over the next 20 years.

- To what extent do you agree or disagree with the spatial strategy and key principles for development in...

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
Urban areas (Policies 1, 2 & 3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Rural areas (Policy 4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you have any comments on the spatial strategy or key principles for development in urban and rural areas, please tell us:

3. Affordable Housing (policy 5)

The NDF sets out the approach for providing affordable housing, encouraging local authorities, social landlords, and small and medium-sized construction and building enterprises to build more homes.

- To what extent do you agree or disagree with the approach to increasing affordable housing?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF approach the delivery of affordable housing?

4. Mobile Action Zones (policy 6)

- To what extent do you agree or disagree the identification of mobile action zones will be effective in encouraging better mobile coverage?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	<i>Don't know</i>	<i>No opinion</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- If you disagree, in what other ways can the NDF improve mobile phone coverage in the areas which currently have limited access?

Please see our accompanying letter.

5. Low Emission Vehicles (policy 7)

- To what extent do you agree or disagree that policy 7 will enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

[illegible]

- If you disagree, in what other ways can the NDF enable and encourage the roll-out of charging infrastructure for ultra-low emission vehicles?

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6. Green Infrastructure (policies 8 & 9)

- To what extent do you agree or disagree with the approach to maintaining and enhancing biodiversity and ecological networks?

[illegible]

7. Renewable Energy and District Heat Networks (policies 10-15)

- To what extent do you agree or disagree with the NDF's policies to lower carbon emissions in Wales using...

[illegible]

- If you disagree with the NDF's approaches to green infrastructure, renewable energy or district heat networks, what alternative approaches should we consider to help Wales to enhance its biodiversity and transition to a low carbon economy?

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8. The Regions (policy 16)

- To what extent do you agree or disagree with the principle of developing Strategic Development Plans prepared at a regional scale?

[illegible]

11. South East Wales (policies 27-33)

In South East Wales we are proposing to enhance Cardiff's role as the capital and secure more sustainable growth in Newport and the Valleys. A green belt around Newport and eastern parts of the region will support the spatial strategy and focus development on existing cities and towns. Transport Orientated Development, using locations benefitting from mainline railway and Metro stations, will shape the approach to development across the region. There is support for the growth and development of Cardiff Airport.

- To what extent do you agree or disagree with the proposed policies and approach for the South East Region?

[illegible]

If you have any comments about the NDF's approach or policies to the three regions, please tell us. If you have any alternatives, please explain them and tell us why you think they would be better.

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12. Integrated Sustainability Appraisal

As part of the consultation process, an Integrated Sustainability Appraisal (ISA) was conducted to assess the social, economic and environmental impacts of a plan. The report identified a number of monitoring indicators, including health, equalities, Welsh language, the impact on rural communities, children's rights, climate change and economic development.

- Do you have any comments on the findings of the Integrated Sustainability Appraisal Report? Please outline any further alternative monitoring indicators you consider would strengthen the ISA.

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13. Habitats Regulations Assessment

As part of the development of the NDF, a Habitats Regulations Assessment (HRA) was undertaken. The purpose of the HRA process is to identify, assess and address any 'significant effects' of the plan on sites such as Special Areas of Conservation and Special Protection Areas for birds.

- Do you have any comments on the Habitats Regulations Assessment report?

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14. Welsh Language

We would like to know your views on the effects that the NDF would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.

- What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Please also explain how you believe the proposed NDF could be formulated or changed so as to have:

- I. positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and
- II. no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

15. Further comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Please see our accompanying letter.

16. Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here	<input type="checkbox"/>
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