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### **Three UK's response to the Welsh Government's Draft National Development Framework**

1. This is Three's (Hutchison 3G UK Ltd) response to the Welsh Government's consultation on the National Development Framework 2020-2040.
2. Three is the UK's challenger mobile network. Since our launch in 2003, our focus has been on enabling our customers to make the most of their mobile service through the development of innovative propositions, such as Unlimited data packages and 4G – now 5G - at no extra cost. As a result, Three carries nearly a third of the UK's mobile data traffic, with our customers using more than 9.1GB of mobile data per month – roughly 3 times the industry average.
3. As the only UK mobile network operator (MNO) with 100 MHz contiguous 5G spectrum, we will be the market leader in 5G. We are investing £2.3bn in building the UK's fastest 5G network, which will allow many individuals and businesses in Wales to work and play faster than ever before.
4. We are also committed to improving mobile coverage throughout Wales – the Shared Rural Network (SRN) announced by the Government on October 25<sup>1</sup> will see the four mobile network operators (Three, EE, O2 and Vodafone) working with the Government to not only close a large majority of existing so-called partial not-spots (PNS)<sup>2</sup> but to also provide 4G coverage to areas that are not currently served by any MNO (so-called total not-spots (TNS).
5. Three fully endorses Mobile UK's response to this consultation.
6. The upgrade and rollout of mobile networks in rural areas is particularly expensive and challenging. This is a case of both economics and geography. The typography of Wales

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<sup>1</sup> <https://www.gov.uk/government/news/1-billion-deal-set-to-solve-poor-mobile-coverage>

<sup>2</sup> Where one, two or three of the four MNOs are present (but not all four).

presents particular challenges, compounded by the demographic spread of population, with a significant number of small but disparate communities. For these reasons, it is vital that Wales reforms its planning systems to keep pace with change in other UK jurisdictions with the ambition of making it more efficient to build appropriate network infrastructure. This should be with the dual ambitions of enabling both larger towers to allow for the upgrade of technology and improvements to coverage but also to reduce the costs and time taken to progress rural applications through the planning system.

7. Three and the other mobile network operators are already in the process of rolling out upgrades to their networks across the UK to make them 5G ready. In addition, all four mobile network operators will be accepting obligations in their licences that commit them to deliver on the SRN targets. This means consumers and businesses in Wales will be beneficiaries. **But in order for these benefits to be realised, planning laws need to be fit for purpose to accommodate these upgrades. Currently that is not the case.** England and Scotland have commenced their respective processes for reforming their planning systems and Wales must also take the opportunity to do so.
8. In order therefore for Policy 6 of the NDF, entitled 'Planning in Mobile Action Zones', to be achieved there needs to be urgent reform of the planning regime in Wales. Three urges the Welsh Government to consult early in 2020 on revised Permitted Development Rights for telecommunications deployment in Wales. If introduced, the following measures would have a very positive impact on the speed and efficiency with which networks can be deployed in Wales:
  - Permitting mobile operators to build some higher masts under PD (with prior approval). This would particularly benefit the Total Not Spots element of the Shared Rural Network and enable operators to a greater area, with fewer masts.
  - Requiring that prior approval is required only for ground-based masts, not building/rooftop based apparatus.
  - Alignment with the fixed telecom operators as to what is permitted under PD (concerning street cabinets and vertical structures)
9. We welcome the recognition in the NDF that 'mobile phones are an essential tool in our everyday lives' and that 'good mobile communications coverage is important to economic and social wellbeing.' However, we agree with Mobile UK that the importance of digital infrastructure, including mobile, should be more deeply embedded throughout the framework. The NDF needs to emphasise the need for a pro-mobile stance that recognises its intrinsic economic, social and environmental value.
10. Three also support the affirmative action envisaged for Mobile Action Zones and urges the Welsh Government to work with Mobile UK to ensure this activity dovetails with the ambitions of the Shared Rural Network.
11. As a further support to network deployment, it is also timely to update the Code of Practice/Technical Advice Note 19. Three understands that this work is underway on this activity and we would be happy to assist.

If you have any questions regarding this submission, please do not hesitate to contact me on [Jennifer.amphlett@three.co.uk](mailto:Jennifer.amphlett@three.co.uk)

Yours sincerely,

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