

Russell George AM
Chair of the Economy, Infrastructure and Skills Committee
National Assembly for Wales
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14 November 2018

Dear Mr George,

Mast Heights

I would like to thank you for writing to me following evidence that was given to your Committee by the Leader of the House, Julie James AM, and your request for additional information regarding the height of masts and any potential impact on an increase within permitted development rights on coverage in Wales.

We are disappointed with the response provided by the Leader of the House who stated that she is unconvinced a change in the permitted development rights regime could have any impact on coverage in areas of Wales that currently experience poor or no coverage. It is important to point out that the vast majority of mast applications are made through permitted development, and as such, it is wrong to suggest that a lack of planning applications is evidence to limit reform. Under permitted development a planning application is not necessary. Also, the point was made during the Committee hearing by the industry that it is important to build in reforms that not only enable network rollout today but ready Wales for the roll-out of 5G.

I would also like to reiterate that the current position in Wales is at stark odds with other areas of the UK where changes to the permitted development rights regime have already been made, and further attempts are being considered to reform it further. As the industry looks forward to the implementation of 5G, there is a real possibility that Wales could find itself even further behind and with a planning and regulatory regime not fit for the future.

Mast Heights

When considering the effect of mast height, I can only provide a theoretical response as actual real-world application relies on several site-specific variables which ultimately determine coverage. However, in a typical representative example (in a semi-rural area, in this case on the M4) the coverage delivered by masts of varying heights was:

- 15m delivers 57.76 sq. km
- 20m delivers 63.77 sq. km
- 25m delivers: 76 sq. km
- 50m delivers 116 sq. km

Additionally, in evidence Mobile UK provided to the Department for Communities and Local Government in 2015 we explained that in an open 'green field' area with antennas at 25 - 30 metres

in height, the area covered could be as much as 5 – 10 km; whereas in contrast, in an urban area, with antennas at 12 metres above ground, the coverage might be only 300 – 500 metres. Again, we are only able to give ranges, because each site is unique, and the coverage depends on a variety of local factors.

However, and perhaps of more interest to the Committee, height is often required for link provision rather than simply to extend coverage. In rural areas, particularly in hilly terrain as found in Wales, it is important that masts are tall enough to have a direct line of sight to the next mast in the chain in order to deliver backhaul via a microwave link where no fibre cable backhaul is available.

I and my industry representatives very much welcome the opportunity you have provided us to provide this additional evidence. As an industry we continue to invest £2bn per annum in our networks to enhance and improve coverage. It is important that going forward positive partnerships are built and that the Mobile Acton Plan is delivered in a timely manner to ensure Wales can play its part in the next generation of mobile telephony.

Yours sincerely

A handwritten signature in black ink, appearing to read "Gareth Elliott".

Gareth Elliott
Mobile UK