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By email to: glenn.preston@ofcom.org.uk

Reply address: access@mountaineering.scot

27 October 2023

Dear Mr Preston

Shared Rural Network – consequences of 91% geographical coverage target

1. We are a coalition of community, conservation and outdoor recreation groups¹ concerned that the focus of the Shared Rural Network's coverage targets – based on geography rather than population – makes little economic, social or environmental sense in Scotland's wild and sparsely populated mountain and upland landscapes, and is causing unnecessary harm and having unanticipated consequences.
2. As the representative of Ofcom in Scotland, and of Scottish matters in Ofcom, and as the Regulator of the process, we are appealing to you to examine this situation and consider how our concern may be addressed.
3. We wish to reassure you that we support the UK Government policy outcome for this digital connectivity initiative to provide better mobile cell coverage for business premises and rural households, and along the road network.
4. Our concern is the consequences of the geographical coverage target, which is resulting in planning applications for masts in areas of Scotland where there are no roads, business premises or local rural households that would benefit from such placement. These are areas that are sensitive to any form of development, with special landscape qualities of scenic beauty or wild qualities, appreciated by the people who actively seek the experience of these remote and wild regions.
5. We have already met with the SRN team and representatives of the Operators and expressed our concerns, but it was made clear that their mandate is to deliver the programme through the planning system within the given timescales. We are now approaching you as representing the interests of Scotland within Ofcom, seeking an adjustment to the SRN delivery programme.
6. We understand that a lower geographical target for Scotland than the rest of the UK has been considered and set in recognition of the character of the land, but we fear the mapping exercise may have misinterpreted the very low population density and distribution in parts of highland Scotland in order to achieve the geographical coverage objective.
7. A rollout focused on geographical spread misses the nuance of clusters of settlement and expanses of land where digital connectivity is not essential to meet the policy outcome. This will lead to under-utilised digital connection services and a waste of public finances to install and maintain them.

¹ Action to Protect Rural Scotland, Community Land Scotland, John Muir Trust, Mountaineering Scotland, North-East Mountain Trust, Ramblers Scotland, Scottish Wild Land Group, The Knoydart Foundation, The Munro Society, The National Trust for Scotland, Woodland Trust Scotland

8. This approach also imposes masts in places where local communities and landowners do not want them – meaningful community and landowner consultation is lacking, with an emphasis on driving a top-down plan through the statutory planning system in an incredibly challenging timescale. The Knoydart case study appended amply illustrates this approach and outcome.

9. We suggest that Ofcom could better protect the public purse, and the remote rural landscapes, by pausing the current scattered, unfocused planning application rollout, and instead advise the Operators to prioritise proposals where the mast signal would provide coverage and associated connectivity benefits for rural residents' homes and business premises, and gaps along the road network.

10. Secondly, once the main roads and settlements have been covered, we suggest a phased process of community consultation, similar to the S4GI initiative, on digital telecommunication mast need to guide where masts are sited and subsequent, lower priority, placement in remote locations where there are no residents, business premises or roads.

11. This consultation would likely delay the completion of the current blunt geographical percentage coverage, but would have the immeasurable benefit of actually addressing rural connectivity needs while protecting the landscapes valued by residents, landowners and visitors alike.

12. We ask Ofcom to re-evaluate the SRN target and deadline, and to delay the threat of fines for the Operators while a solution is found that satisfies the need of rural communities in Scotland, and not have an un-consulted plan enforced upon them.

13. As an example of the unintended consequences and harmful approach of the current process, and a case study of how a more focused and targeted approach may be beneficial, we append a note of the situation that has arisen in the communities and landscapes of Knoydart, where the top-down geographical approach has not solved any connectivity needs and has caused anxiety and anger in communities both of place and of interest and participation.

Yours sincerely

Mike Daniels
Director of Policy
John Muir Trust

Stuart Younie
Chief Executive Officer
Mountaineering Scotland

On behalf of:

Action to Protect Rural Scotland
Community Land Scotland
John Muir Trust
Mountaineering Scotland
North-East Mountain Trust
Ramblers Scotland
Scottish Wild Land Group
The Knoydart Foundation
The Munro Society
The National Trust for Scotland
Woodland Trust Scotland

APPENDIX

The approach of contractors and network providers on the Knoydart peninsula is indicative of the wider problems of the Shared Rural Network.

Knoydart Foundation

In January 2023 community landowner The Knoydart Foundation was approached by Gateley Hamer and informed of intentions to build new telecoms infrastructure on the Knoydart peninsula - inhabited by roughly 130 residents - as part of the Shared Rural Network Scheme.

During a site visit two months later it became apparent that contractors were targeting entirely inappropriate locations to erect telecoms infrastructure. The two sites visited would provide no additional 4G coverage to homes on the peninsula or the peninsula's less than seven miles of council maintained road. Due to the geographical land mass targets, contractors were more interested in providing coverage to swathes of uninhabited and rarely visited land, than boosting coverage of homes, businesses or workplaces.

The South Knoydart Community Council informed community members of the proposals and asked whether they would or would not be in favour of the construction of new telecoms infrastructure. 100% of the 103 respondees said they were NOT in favour of progressing with the scheme for a multitude of reasons, including the following:

- Environmental impact: due to the remote nature of locations and the, these masts will be built and maintained by helicopter. This offsets the effort being made to increase carbon sequestration through the planting of native woodland and the regeneration of peatland.
- No community benefit: homes and road network would not be provided additional 4G coverage. Forestry, deer management and agricultural employees have their own means of communication and anticipate no benefit.
- Waste of public funds: infrastructure and labour is costly and unnecessary with so few if any people set to benefit.
- Negative impact on tourism: the mountainsides are iconic and largely unspoilt, even with the utmost care in the pre-build stage views will be negatively impacted, detracting from the visitor's experience of a National Scenic Area and Wild Land Area.
- Heavy handed: the approach of the Shared Rural Network is disproportionate in terms of population and landscape.

As community landowner, the Knoydart Foundation released the following statement:

“The Knoydart Foundation, as a representative of the community on Knoydart, respects the outcome of a recent community consultation on proposals to erect further telecoms masts across the Knoydart Peninsula. The Knoydart Foundation will not support or facilitate in any way future development of these proposals. On community owned land we are actively opposing such works as have been proposed.”

South Knoydart Community Council released the following position statement:

“The South Knoydart Community Council (SKCC), the most local tier of statutory representation on Knoydart, has carried out a community consultation on the Knoydart peninsula, to gauge community opinions on the proposed roll-out of mobile communications masts in remote parts of the peninsula, as part of the UK Government's Shared Rural Network Programme.

“The results of this consultation, which received the largest ever response to a community consultation on Knoydart, showed unanimous opposition from the community. On the basis of information on the programme received and in the absence of any engagement, dialogue or evidence-based arguments from the prospective installers, our initial position is to oppose this widespread installation of new masts.

“SKCC would require convincing that the benefits of these masts meet an actual, rather than an externally perceived community need, to balance against the clearly and strongly based community opposition. That said, this initial opposition would not preclude us considering any actual planning proposals fairly and objectively, taking the arguments of the prospective installers and the community into account on a case- by- case basis before deciding to support, remain neutral or oppose any specific planning proposal(s).

“We would expect evidence that the prospective installers are adhering to the Department for Digital, Culture, Media and Sport (DCMS) code of practice to ensure best practice in protected areas such as Knoydart and ensure stakeholders are properly and fully consulted. The lack of dialogue to date suggests that adherence to the DCMS code of practice is not currently being made.”

Neighbouring landowners on the Knoydart Peninsula have also voiced their frustration at the approach of the Shared Rural Network. These landowners are listed below.

Camusrory Estate

The Camusrory Estate situated above the banks of upper Loch Nevis were first approached by Gateley Hamer in December 2022.

Contractors and mobile network providers have again decided on a site which presents a litany of problems while delivering little, if any, benefit.

The proposed site (TNS0016) is situated on the River Carnach, to the west of the remote peak of Sgurr na Ciche. A representative for the Camusrory Estate has highlighted the following issues:

- Lack of connectivity
- Questionable coverage due to the location at the base of various hills
- Lack of people to benefit from coverage (there is already mobile coverage at Camusrory)
- Low number of people passing this location
- Disturbance of golden eagles
- Difficulty of construction
- Difficulty of powering
- Access challenges to Camusrory in general (let alone the actual site)
- Environmental damage and visual damage to an unspoilt wild place

Kilchoan Estate

The Kilchoan Estate, to the east of the Knoydart Foundation Estate, has been in communication with Gateley Hamer since January 2023.

The Kilchoan Estate currently hosts the S4GI emergency services which was erected by WHP Telecoms in 2022, and provides coverage of 152 Km².

Despite the presence of the S4GI mast, Kilchoan were approached by contractors to explore three new locations on their land.

Barrisdale Estate

A survey led by Mitie was first conducted on the Barrisdale Estate in April, with requests issued for an MSV since August.

The landowner raised several concerns about the selection of the site (TNS0009) by Mitie and Three:

- The site is in front of the one of the last remaining Caledonian Pine forests and at the foot of the glen.
- The resident community have not been consulted and have received no information on the scale of this mast, nor a visual impact assessment.
- No information on the environmental impact of this mast: how much carbon dioxide will be needed to run it, and the resulting noise pollution.
- Enormous investments have been made in maintaining Barrisdale in an environmentally positive manner. This includes the hydro scheme that underwent extensive surveying (with Nature Scot, and SEPA) and allows Barrisdale to run on green energy. A fuel reliant machine would undermine this.
- The operator wants to use a track that has been built for the hydro scheme. This track is unstable and not suitable for traffic. They would like to slowly return this track to nature rather than re-instate it for a 'handful of visits each year' by the telecommunications personnel.
- There are 1 to 2 full time residents at Barrisdale, they are not interested in a phone mast. The WKDMG (West Knoydart Deer management group) of which we are part, has also voted unanimously against this. We understand the need for emergency services for walkers, and have no issues with the ESN program and are at the walkers' service if there are any emergency needs while they are visiting Barrisdale, however, this mast is not intended to cater to that. They stand behind Mountaineering's Scotland's statement of preparing people for the mountains, rather than the mountains for people. Walkers trek to Barrisdale for days to be welcomed by wilderness, not by a phone mast looking over the valley.

Nevis Estate

The Nevis Estate has been approached to build three masts on their land. They are "vehemently" against one site at Kylesmorar.