Dear Sir/Madam,

Geographical and Economic Context

Shropshire is a predominantly rural large county, with just under one person per hectare (0.98 persons; 313,400 population; source ONS mid year estimates 2016), for a terrain covering 319,736 hectares. The county size is approximately ten times that of all Inner London Boroughs (31,929 hectares; source ONS Census 2011). Around 34% of Shropshire's population lives in villages, hamlets and dwellings dispersed throughout the countryside. The remainder live in one of the 17 market towns and key centres of varying size, including Ludlow in the south and Oswestry in the north, or in Shrewsbury, the central county town.

Shropshire Council seeks timely opportunities to respond proactively to national calls for evidence from Parliamentary Select Committees, Government Departments, and national bodies such as Ofcom, the National Infrastructure Commission and the Office of National Statistics. Our aim is always to share our local perspective and to help to shape national and local policy to achieve mutual outcomes for communities. We work closely with other local authorities and through strategic partnerships in so doing, particularly with Herefordshire Council and Telford and Wrekin Council through the Marches LEP, and through organisations such as the County Council Network and the Rural Services Network, as well as collaborating with those bordering us, i.e. Cheshire West and Chester, Cheshire East, Powys, Staffordshire and Worcestershire.

This has included recent responses aimed at development of the Industrial Strategy in ways that will be of benefit to our rural communities and businesses, emphasising the need for robust evidence about need. For example, in our response to BEIS, we not only referenced previous response to DCMS about development of full fibre broadband, where we re-stated our position that "5G is only realistic in urbanised environments", but also articulated concerns that rural evidence did not appear adequately factored in to proposed policy intentions, e.g. assumptions made about broadband and mobile connectivity do not account for current realities for rural communities

For communities and businesses who live and work here, and for those who visit here, we have also commented in current Defra consultation on the Agricultural Command Paper that mobile connectivity is crucial for the land based sector in terms of their day to day farming activities; for the tourism economy, including online promotion, use of mapping tools to reach attractions and accommodation, and use of apps such as TripAdvisor; and for communities themselves in their day to day lives. This is not an issue exclusive to uplands areas, and indeed in Shropshire a recent large scale consultation by BT into proposed removal of existing callboxes indicated continued need for their retention across the county due to the patchiness of mobile phone coverage; the isolated nature of the communities in which callboxes are located; and the physical challenges of the terrain. The Council as Local Planning Authority continues to hold to a default position of retention of operational callboxes very much because of the concerns over inconsistent mobile phone coverage, and inadequate national evidence about such coverage.

The business base in Shropshire is dominated by SMEs (99%) and of these, 90% are micro businesses i.e. employing less than 10 employees. There are almost 15,400 businesses registered businesses in Shropshire across a wide variety of sectors, with many technology led, including automated industries, environmental science and technology, advanced manufacturing and health care innovators. All businesses now demand and need key digital infrastructure components which is a prerequisite to their economic growth.

Mobile Connectivity Context

- Shropshire 4g rural coverage remains in the lower quartile of English Counties;
- 7.2% of Shropshire's geography has no reliable 2g outdoor signal from any MNO;
- 13% of premises in the Shropshire geography do not get a reliable indoor 4g signal;
- The Government MIP intervention project failed to deliver any new masts in Shropshire, despite 10 sites originally being planned.

Recommendations

- Voice coverage remains more important to rural communities than data coverage. Voice needs to take a higher priority than on data services;
- MNO's should be encouraged to share infrastructure. Asking MNO's to make information available about locations of new sites in rural areas, available to the other operators at least 30 days in advance of a planning notification, is insufficient. 3 months noticing should be a minimum requirement. At best, 6 months to allow for coordination and planning;
- We would recommend that MNO's are encouraged to share existing, publicly funded mast infrastructure being deployed for Fixed Wireless broadband deployment as part of the BDUK programme;
- Congestion over the networks continues to frustrate consumers and more pressure needs to be applied on the MNO's and their Suppliers to provide sufficient headroom to meet the growing data demands; responsiveness to addressing congestion needs to be dictated to the MNO's and their backhaul suppliers;
- We would recommend that the 60% premises obligation is proportionately cascaded downwards to the counties which have the widest gaps on coverage;
- We would recommend that the 92% landmass obligation is proportionately cascaded downwards to the counties which have the widest gaps on coverage;
- The timescales for deployment commencement and completion appear challenging based upon experiences we have from the MIP programme. Constraints on land acquisition and planning consents will impact deployment timescales;
- Once deployed the MNO obligations should be rigorously tested by 'drive by' testing in each geographic county bi annually.