

**CONSULTATION ON STATUTORY GUIDANCE ON PLANNING AND  
SUSTAINABLE DEVELOPMENT**

**RESPONSE SUBMITTED BY NATIONAL GRID WIRELESS AND ARQIVA**

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**Background to our Representations**

1. National Grid Wireless (NGW) and Arqiva own and operate the radio and television broadcast networks that transmit across the whole of the UK. Between us we provide all terrestrial television broadcasting for the BBC, ITV, Channels 4 and 5 and Freeview, together with radio broadcasting for the BBC and all independent stations. The broadcast services we provide are for analogue and digital terrestrial television broadcasting and analogue and digital audio broadcasting.
2. We are currently implementing the Government plan to switchover all analogue television broadcasting to digital. The Digital Switchover will extend choice and

quality as well as facilitating the next generation of television services, such as view on demand and remote shopping.

3. Our activities are clearly in the public interest as they contribute directly to a number of important UK Government objectives including the encouragement of modern communications and the economic prosperity they bring. In addition, the modern communications we provide and facilitate make a direct and significant contribution to the Scottish Ministers key priorities for sustainability, initially presented in its vision: *Meeting the Needs: Priorities, Actions and Targets for Sustainable Development in Scotland (April 2002)* and now steered by SPP1, the National Planning Framework and more recently the Planning etc (Scotland) Act 2006.

#### **Connectivity and modern communications**

4. The importance of modern communications in developing sustainable economies and communities is a key policy issue. Paragraph 85 of the National Planning Framework ('NPF') 2004 states, inter alia, that:

*"The advance of information and communications technologies is certain to continue over the next 25 years. As the ability to use them becomes an increasingly central requirement in employment and connections to global networks become more important for economic success, their accessibility becomes a key issue for economic and social development."*

5. The Planning etc (Scotland) Act 2006 has placed a statutory primacy on the National Planning Framework. The current review of the NPF (leading to NPF2) places a further emphasis on promoting sustainable economic growth to create a vibrant and modern Scotland. Modern communications and their connectivity are seen as key factors in attaining long-term sustainable development and growth.

6. The importance of electronic communications and connectivity cannot be understated. Since 1992, we have been going through a communications revolution that continues. In 1992, we had:

- No internet, let alone broadband
- No electronic mail
- No digital television or radio broadcasting
- 1G mobile services for voice traffic only, that were used by a few million and were relatively unreliable and of poor quality.

7. In 2007, we have seen some key growth indicators for electronic communications:

- 45% of UK individuals with broadband internet access (up from 35% in 2005) with greater take up in urban areas (Scotland 42%)<sup>1</sup>
- 62% of small businesses with broadband internet access (67% Scotland), with a higher % for large businesses<sup>1</sup>
- 61% UK individuals with internet access and 77% take up by small businesses<sup>1</sup>
- Extensive use of e-mail communication and data delivery
- Video conferencing
- The deployment of portable wireless connections, including wi-fi hotspots
- Digital broadcasting for television and radio services

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<sup>1</sup> OFCOM Communications Market Report 2007

- 2G and 2.5G mobile services with around 65 million customers provide high quality and reliable voice, data and limited visual media
  - Almost everyone in the UK lives in a postcode with 95% or more 2G coverage (by at least one operator) in Q1 2007 <sup>1</sup>
  - New services such as satellite GPS navigation and other traffic services
8. If one projects to say 2012, one can forecast how communication and connectivity will continue to support the fundamentals of sustainable business growth, economic advantage and social justice:
- Internet access in excess of 90% for all homes and businesses
  - Even more extensive use of e-mail
  - Extensive use of video conferencing
  - Fixed and wireless broadband connections available to most homes and businesses providing main PC connections to millions
  - The deployment of digital broadcasting for television and radio services completed providing for example, home shopping advantages
  - Digital broadcast services available to 3G mobile phone users
  - Analogue television and radio broadcasting switched off and a massive amount of spectrum available for reuse for other business purposes

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<sup>1</sup> OFCOM Communications Market Report 2007

- The full deployment of 3G mobile services with large volumes of traffic for data and visual media used by millions on a daily basis
  - Satellite navigation and other traffic services fitted as standard in all new vehicles
  - A range of other new products and services based upon or reliant on modern communications such as Wi-Max.
9. Electronic connectivity will continue to be one of the most fundamental changes to take place in modern Scottish society. Modern communications will continue to present one of the best opportunities for helping Scottish Ministers meet ambitious targets on sustainability, address demographic differences and to foster sustainable community development and economic advantage.

### **Key Observations**

10. Given the above, we are concerned that the Consultation Paper makes little mention of what is currently a fundamental change taking place in UK society. This concern is further reinforced by the fact that some of the premises that underpin current policy approach to achieving sustainability still remain unsound and that is a major reason why the policies have either failed to deliver or not delivered to the anticipated extent.
11. The Consultation Paper cuts across a wide range of sustainability issues, set within policy context. We do wish to comment on all areas of the Paper although our comments may be applicable to most parts of the Paper. Instead we choose to provide two simple examples which seek to demonstrate how proposed policy considerations on achieving sustainability might not recognise the advantages or contribution to be made by modern electronic communications.

## **Reduce the need to travel and encouraging Public Transport Provision**

12. Typically the Consultation Paper suggests that the use of public transport can help reduce reliance on the private vehicle and reduce for example, congestion and the associated benefits of such reduction. However, the facts do not support the weight attached to this policy direction. Approximately 23% of Scottish Workers are long distance commuters (defined as a single journey over 15km). Over 80% of all commuters' travel by car, 8% by bus and 7% by train.<sup>2</sup> Public transport is largely outside the control of government and so the delivery of costly investment to improve networks and services is dependent on others.
13. To reinforce this point, in 2007 Network Rail announced its first Scotland Route Utilisation Strategy (RUS), anticipating a growth in passenger numbers by 30% over the next 10 years. Even with a massive investment programme to attain this goal, this would amount to only a further 2.3% growth in train use (up to circa 9% commuter use) and would still be insignificant in the context of the bigger transport picture.
14. To contrast the near complete lack of achievement through current transport policy and our concerns that intended policy may have similar flaws, modern communications can deliver immediate and dramatic reductions in travel, by helping to change work patterns. Take for example an office worker who normally commutes to work during the peak hours and has a fifty-mile round trip, i.e. 250 miles in a normal working week. If that worker simply works at home one day a week, using modern communications to provide the necessary links, then his commute will reduce by 50 miles or 20%.<sup>3</sup> If two days then that increases to a hundred miles or 40%. Even if the same worker went in every day, but left later

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<sup>2</sup> Scottish Executive – Long Distance Commuters in Scotland – July 2006

<sup>3</sup> 12% of all UK trips over 50 miles are commuter trips – National Travel Survey 2004: Transport Statistics; 18% 50-75 miles are commuter trips

having dealt with emails in the first part of the morning, he would avoid the morning rush hour and help massage the peak in traffic usage and so help reduce congestion.

## **Climate Change**

15. Climate change is an international agenda. At the G8 Summit in Heiligendamm in Germany in June 2007, the Heads of State and Government have agreed to halve global CO2 emissions by 2050.
16. In taking this issue forward at more local level, the Scottish Executive suggests<sup>2</sup> that removing long distance car commuters from Scottish peak road networks would lead to a 34% and 21% decrease in CO and CO2 emissions from traffic respectively. However, as we have outlined above, it is far from certain that initiatives such as clean public transport provision will in itself significantly contribute to this attainment.
17. However, we reiterate that work patterns such as those identified earlier, facilitated by modern communications can make real and dramatic reductions in emissions, without extra public investment. To reinforce this point, it is office workers who are most likely to be in occupations that could in part be carried out from home and often those that utilise the car for commuting at peak times. It is that same white collared group, which is generally well paid and so prepared to commute long distances to work and opportunity to utilise alternative working practices reducing the need for travel. .
18. It is this kind of change that policy should encourage to people's lifestyles. Moreover such change and the lifestyle benefits it brings would also contribute towards other important social objectives on quality of life, such as creating flexibility in the workplace for parents and other carers, helping single parents

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2 Scottish Executive – Long Distance Commuters in Scotland – July 2006

and supporting family life generally. In essence, promoting and supporting modern communications and connectivity to foster true sustainable lifestyle and communities.

### **Recommendation**

19. In short the Scottish Executive needs to develop new policy to truly encourage sustainability. Modern communications and connectivity hold the key to unlocking many of the difficult conundrums faced by Government in this area. There is a need to promote electronic communications infrastructure and services to extend economic opportunity in a more sustainable manner. Encouragement should be given to e-business and facilitating more modern working practices that bring about great improvements in efficiency and effectiveness, whilst at the same time reducing the need to travel, so reducing CO2 emissions.
20. Our main message is that Consultation Papers such as this should not ignore the communications revolution that has and continues to take place and its very important role in contributing towards sustainable development. Past policies have failed and there is no evidence to suggest they will succeed in the future, so new initiatives and technologies should be promoted to the best advantage of addressing national and global sustainability issues.
21. We urge that the Scottish Executive fully address this in forthcoming policy guidance and review of the National Planning Framework and properly harness the benefits of the communications revolution to the attainment of sustainable objectives that have so far proved largely elusive.
22. We hope our response is a helpful contribution to your consultation and would be pleased to discuss any aspect if that would assist further.

**NATIONAL GRID WIRELESS AND ARQIVA  
JUNE 2007**

**RESPONDEE INFORMATION FORM: Draft Statutory Guidance on Planning and Sustainable Development**

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name: NATIONAL GRID WIRELESS AND ARQIVA

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1. Are you responding as: (please tick one box)
- (a) an individual  go to Q2a/b and then Q4
- (b) **on behalf of** a group or organisation  go to Q3 and then Q4

**INDIVIDUALS**

2a. Do you agree to your response being made available to the public (in the Scottish Executive library and/or on the Scottish Executive website)?

- Yes (go to 2b below)
- No, not at all  We will treat your response as confidential

2b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (please tick **one** of the following boxes)

- Yes, make my response, name and address all available
- Yes, make my response available, but not my name or address
- Yes, make my response and name available, but not my address

**ON BEHALF OF GROUPS OR ORGANISATIONS:**

3. Your name and address of your organisation **will be** made available to the public (in the Scottish Executive library and/or on Scottish Executive website). Are you content for your response to be made available?

- Yes
- No  We will treat your response as confidential

**SHARING RESPONSES/FUTURE ENGAGEMENT**

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future for consultation or research purposes?

- Yes
- No

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