



Councillor Raymond Bremner  
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8 April 2024

Dear Raymond,

Thank you for your letter setting out your concerns about the Shared Rural Network (SRN) Programme and its potential impact on remote areas of natural beauty in Scotland and the Highlands. Please accept my apologies for the unacceptable delay in replying to your letter, which has only just been drawn to my attention.

I appreciate you raising the views of the Highlands Council with me directly as the SRN is something we want to get right and maintain community support for. The SRN programme offers a generational opportunity to drastically improve the availability of mobile network coverage across Scotland, and we are keen to make sure that your residents and businesses benefit.

Scotland has the lowest geographic 4G mobile coverage in the UK. For this reason, around 75% of all government spending on the SRN, circa £300m in the Total Not-Spots (TNS) and circa £75m in the Extended Area Service (EAS) parts of the programme, will be directed at improving coverage in Scotland.

The expected benefits of getting a combined geographic coverage footprint of 95% are extensive, especially in rural areas which have too often been left behind. They include economic and productivity growth, as well as wider social benefits that make life in the Highlands more practical for young people and families. Expected benefits arising directly from the programme include better consumer choice of network provider, a boost to the tourism industry, and greater equality between rural and urban areas.

With regards to the specific points raised in your letter, I have addressed these in turn below:

**1. *Consulting with rural communities across Highland to establish their digital connectivity needs first***

Following the Council's meeting and subsequent vote on 11 January, the SRN delivery partner Digital Mobile Spectrum Limited (DMSL) tried to arrange a meeting with Councillors to address some of the points made at the Council meeting. Bryn Jones, the DMSL SRN Programme Director, wrote to you and Mr Lobban on 16 January seeking the opportunity to engage with Councillors, and I would encourage you to take up that offer as I am sure it would be a helpful meeting and alleviate a lot of the concerns the Council have.

**2. *Avoiding construction of new access tracks unless no other method is possible***

On 13 December, officials from Building Digital UK (BDUK) joined a call with Highlands Local Planning Authority to discuss the programme. Access tracks were one of the many points raised and it is something BDUK and all four Mobile Network Operators (MNOs) are aware of.



As you will be aware there is a significant amount of work that goes into planning for each mast site, with MNOs considering all access options when assessing a site's suitability using the relevant policy and guidance to plan appropriate access. Should there be a necessity for a new access track as part of the application, it will be formally assessed through the planning process.

### **3. *Adequately resourcing Local Planning Authorities***

BDUK is willing to work with stakeholders across the Highlands to assist with delivery of the SRN and ensure Local Planning Authorities have all the tools they need to process planning applications. I am aware that DMSL has previously engaged with the Highland Council planning department to discuss how the lack of resourcing in Local Planning Authorities might be addressed, including the potential for financial support to help with resourcing of planners, although I understand this offer was subsequently not accepted.

To assist with planning further, DMSL and the MNOs are working on a list of minimum requirements they anticipate needing for an application to be submitted without the need for pre-application consultations. The proposal will be shared with Dafydd Jones of the Highland Council Planning Department, with whom a lot of engagement about the SRN has already taken place. Should the proposal be accepted, this could help speed up the validation and management of planning applications and alleviate some of the pressures faced by case officers by reducing the time needing to be spent on applications.

Mr Jones has also been offered the chance to join a monthly session hosted by DMSL with the MNOs to talk through any programme wide planning challenges. This is a standing and open invitation, and I would urge Mr Jones to attend if possible.

### **4. *Avoiding the Highland's designated and other environmentally sensitive wild areas***

The four MNOs and their suppliers are currently establishing where masts should go to deliver the best coverage by carrying out site suitability surveys. This includes engaging with landowners and agents to discuss access arrangements, and where necessary, operators will consider alternative options. Stakeholder engagement by the MNOs is ongoing across Scotland and the Highlands so community concerns are heard. At each potential location, there is an individual assessment taking account of a wide range of factors including consideration to areas of natural beauty. All new masts will, of course, then go through the proper planning process.

### **5. *Insisting that mobile operators share mast infrastructure, rather than building adjacent masts***

Initial plans developed in 2021 suggested that approximately 300 new sites would be needed to deliver coverage improvements in Scotland as part of the SRN's TNS programme. However, we now expect to need far fewer masts than originally planned. To minimise the impact on the countryside all four operators will share each masts meaning there is less need for more new infrastructure in these areas in the future.

I have asked both my officials and their colleagues at DMSL to work through each of your concerns with you and would be grateful for your support in encouraging positive engagement between our organisations to make the SRN programme a success.

Dean Creamer, BDUK's Chief Executive, is happy to meet you to discuss this issue further. His office will be in touch to find a suitable date.

With best wishes,

A handwritten signature in black ink that reads "Julia". The signature is written in a cursive style with a large initial 'J'.

Julia Lopez MP  
**Minister for Data and Digital Infrastructure**