

Providing Connectivity to New Build Developments
Department for Culture, Media and Sport (DCMS) Consultation
Shropshire Council response 20th December 2018

A. Context for Call for Evidence

1.0 Purpose of DCMS consultation

- 1.1 We have noted that, in summary, the preferred option is to recommend that Gigabit capable connections are made available to all new build homes, subject to a cost cap of £3,000, and that DCMS has stated intentions to use the consultation period, and subsequently the responses to the consultation, to continue to refine the proposal.

2.0 Our response

- 2.1 Shropshire Council very much welcomes the timing of this call for evidence, and the opportunity it has presented for local evidence to be collated and considered and to inform and shape national Government policy around new builds and digital connectivity.
- 2.2 It comes as we continue with our local consultation phases of the Shropshire Local Plan Partial Review, alongside implementation of our Economic Growth Strategy and development with subregional colleagues of the Local Industrial Strategy for the Marches Local Enterprise Partnership (LEP) area.
- 2.3 The Marches LEP is geographically one of the largest in the country, covering 2,300 square miles, and looks west to Wales and across to the West Midlands, as well as north and south to neighbouring areas. As such, the region has a collaborative and collegiate approach to partnership working, typified by the three local authorities of Herefordshire, Shropshire and Telford and Wrekin working together with business and academia through the LEP and with the Marches Nature Partnership, which acts as environmental sounding board for the LEP.

3.0 Our demography and our evidence base

- 3.1 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.
- 3.2 The county size is approximately ten times that of all Inner London Boroughs (31,929 hectares; source ONS Census 2011). Put another way we are the same population as Nottingham but 42 times bigger. 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.

- 3.3 In Shropshire, **digital connectivity** is a prime illustration of an infrastructure challenge or barrier to social inclusion and economic growth that cuts across all sectors from agriculture through to retail and tourism, across all sizes of business including SMEs and start-ups, and across a demography that is ageing.
- 3.4 The percentage of the population of Shropshire that are aged 65-84 is 20.3%, which is significantly higher than the England average of 15%. This is national data from the ONS Census 2011 and mid year estimates for 2016.
- 3.5 We have commented on this ageing demographic in a briefing paper that we provided to the Department of Health in October 2018, with regard to the Industrial Society Grand Challenge of an Ageing Society. In this, we also made reference to the submission that the Marches LEP has provided to the Department for Environment, Food and Rural Affairs (Defra), with regard to key recommendations from the subregion for rural research priorities. These have been put forward in order to inform development by Defra of a Statement of Rural Research Priorities.
- 3.6 We recognise how digital connectivity could be an economic leveller for our rural communities and businesses. In that sense this is about social and economic inclusion. The following research priorities have a particular focus on the dual perspectives of an ageing society and a rural geography, within which practical issues around digital and physical connectivity may usefully be not only identified but also utilised as evidence for national and local policy making purposes.

Rural economy:

- Care sector and projected growth: recruitment, training and skills challenges;
- Health care diagnostics, devices and testing, driven by data and Artificial Intelligence;
- Innovative products and services to support an ageing workforce.

Future change:

- Digital connectivity and older people, including uptake of online services; telecare and telehealth;
 - Use of One Public Estate approaches to land and asset management together with service delivery.
- 3.7 Our aim is to use technology to accelerate 'Public Sector Reform' and provide better service outcomes for our citizens. The Paul's Moss development in Whitchurch is an example of an opportunity to optimise land assets and create a new health and community hub on a single dedicated site in one of our larger market towns. The Council agreed in August 2018 to invest in the

project as part of plans to regenerate the town, and regenerate and redevelop the site into a hub of housing, healthcare and community activity that will meet the needs of the local community and reflect the future design and delivery of health and social care services. Work is expected to take around three years and be completed by 2022.

- 3.8 Alongside specific projects around new build and healthcare, such as the above, Shropshire Council's Local Plan Partial Review, which commenced in October 2017, is now into the Preferred Sites formal stage of consultation.
- 3.9 It has a focus on key areas of change, including options for the level and distribution of new housing and strategies for employment growth during the period to 2036, together with any amended policies and new site allocations which are needed to demonstrate that these requirements can be delivered. The Preferred Sites November 2018 stage takes into account feedback from consultation on the 'Preferred Scale and Distribution of Development' stage in October 2017.
- 3.10 The need has been identified to build 28,750 new homes by 2036. Whilst in 2017/18 1,876 new homes were built, private sector developers are focussed on profit maximisation in the 3-5 bed 'for sale' market. The evidence is that the market is not, and will not, build the housing needed to meet the broad future needs of communities.
- 3.11 By way of illustration, roughly one third of new household formation is due to the growth in older population. By 2030, Shropshire will comprise of almost 33% people aged over 65. There is a wealth of research that demonstrates how developing purpose designed housing promotes longer and more productive independent living which is better for residents and helps offset growing pressures in local health and care systems. Housing that incorporates E-health capabilities is therefore a key policy driver for the Council, just as much as policy imperatives around energy efficient housing, water quality and supply, physical infrastructure, etc.
- 3.12 Given that much of this stock will need to be built in rural areas, it will require fibre connectivity to enable this e-functionality. We make reference in our response to this DCMS enquiry to the need to 'top up' the higher costs of rural connectivity above the defined benchmark costs. There is thus a significant social value around connecting all new premises, alongside economic and environmental considerations.
- 3.13 One of the ways in which the Council is seeking to address demographic exigencies is through the establishment of a Council Wholly Owned Local Housing Company, the formation of which was agreed in principle at Cabinet this December 2018. A full business case, business plan, financing and governance arrangements will be brought back for final approval.

- 3.14 The Company's role will be to acquire, develop and manage homes, utilising a proactive asset and land management approach to maximise opportunities. It will help address specific local housing supply and market deficiencies and generate income to assist the Council to be more financially self-sufficient and help fund wider goals and ambitions. Our ambition is to make every new home built by our own company to be low energy, sustainable and digitally enabled.
- 3.15 In so doing, it will also seek to address and enable broader public-sector savings; encourage economic growth, employment and skills development; promote innovation and development in housing related technologies and practices; and become a leader in improving and redefining UK housing provision.
- 3.16 Finally, in this prequel section we would also like to make a headline comment that all new sites should have a fibre kite mark associated to them which will support purchasers in making appropriate choices. This would clearly include any sites that are brought forward in the future by a Council Local housing Company.
- 3.17 We look forward to results and to any recommendations arising from this call for evidence, and would be happy to provide further evidence. This should be directed in the first instance to our lead officer, as per signature and contact details provided.

4.0 Related responses

- 4.1 We are aware that an LGA response has also been produced on this matter, and shared our response with them ahead of submission to Government in order to aid identification of commonalities for local authorities on this matter. The LGA had indicated that the following areas were likely to have particular resonance, and we have taken account of these accordingly in our own response.

Areas of particular interest:

- Any local evidence on current poor new build connectivity rates, potentially strengthening thinkbroadband analysis.
 - The proposed 'connectivity plan' outlined in the consultation – e.g. any opportunity this could provide for the developer to also outline how it has also consulted mobile network providers too
 - The proposed timings – i.e. at present the developer must provide their connectivity plan 9 months prior to site build.
- 4.2 Civil servants have also asked that the LGA provides information on any potential planning authority burdens: Government is currently considering making changes to Building Regulation Part R.

- 4.3 At present Part R requires that houses are made high-speed broadband ready through the installation of the relevant ducting within the premises. The Government is considering altering Part R to require the installation of ducting from the premises to the boundary of the development.
- 4.4 Relevant questions are therefore:
- Are planning authorities inspecting Part R of the building regs as it stands?
 - Would the planning authority be in a position to inspect whether ducting from the premises to development boundary was appropriately installed?
 - Would it ask the developer to undertake the test or would it carry it out itself and charge the developer?
- 4.5 They have also asked whether planning authorities would require extra resource to collect and store connectivity plans
- 4.6 The LGA have also noted to local authorities that Openreach [has announced it is discounting its full fibre connection rates](#) to developments under 30.

5.0 Related strands of enquiry

- 5.1 We are appending pertinent extracts of evidence that we have previously submitted to DCMS, with regard to extension of full fibre networks, and to the ongoing House of Lords Rural Economy Committee inquiry. Other information of relevance includes submissions made to Government with regard to the development of the Industrial Strategy, and with regard to Rural Research Priorities, where response from Defra is awaited. These were collegiate responses with the Marches LEP, and can readily be supplied to amplify the points that we are seeking to make.

B. Key lines of enquiry by DCMS

1.0 Question One

Do you have any further evidence on the state of New Build Development connectivity in the UK?

1.1 Shropshire Council response

We have, over a period of several years seen clear evidence in Shropshire that Developers have not prioritised digital infrastructure on new build sites. As a result the Local Authority has been approached by new occupiers to address the issue of market failure through State Aid subsidy that we feel is wholly inappropriate under the circumstances. There is evidence, in some isolated cases, where new build estates have been brought into our state aided procurements in order to address this market failure, to then subsequently see retrospective build by Infrastructure providers through community partnership models.

The following relates to sites registered with Shropshire Council since 2016 up to 2018:

- Developers tend to register new build sites with infrastructure providers with insufficient lead times. Late registration of sites are high at 52.8%.
- 382 sites were registered between 2016 -2018 covering 4608 plots. Of these the deployed solutions show:
 - Copper (ADSL - 57% sites/20% plots). 211 sites/808 plots
 - Fibre to the cabinet (VDSL – 36% sites/32% plots) 133 sites/1297 plots
 - Fibre to the Premises (VDSL – 8% sites/48% plots) 28 sites/1917 plots
 - 10 sites were not contracted covering 586 plots
 - 21 sites (286 plots) received speeds of less than 10Mbps.

These statistics show that there has been a market failure in delivering full fibre to new sites to date. Small scale site development, of which a significant proportion is outside of urban environments, where FTTP solutions are expensive to deploy to, have been left with poor copper connectivity. To date most of these have not been captured within new state aided procurements leaving home owners stranded with poor digital connectivity.

1.2 LGA response

Earlier this year, the LGA commissioned analysis of new build connectivity across England disaggregated by urban and rural premises. It showed a continuing urban and rural digital divide across newly built homes.

Of those premises built in rural areas in the last three years, one in five is still not connected to superfast broadband; one in 10 cannot achieve the USO minimum speed of 10 Mbps; and only one in four has full fibre connectivity. If Government is to succeed in building an average of 300,000 homes a year by the mid-2020s and achieving nationwide full fibre coverage by 2033, it must introduce legislation to ensure that developers connect all new builds with future-proofed digital infrastructure.

2.0 Question Two

Do you have any information or evidence to suggest that the costs developers would incur under the proposed policy would prevent homes being built?

2.1 Shropshire Council response

We have no evidence from the development sector to indicate that providing fibre to the premises is a prohibitive development cost. The issue in rural areas will be whether fibre provision exists within the locality to connect to. Developers will ordinarily deal with the infrastructure on site as part of their normal development costs. If off-site infrastructure is required in order to facilitate FTP this may affect the overall development cost and viability.

2.2 LGA response

We do not foresee the additional costs of full fibre provision, as presented in this consultation, preventing new homes from being built. However, we do see a potential problem arising for developers if broadband providers do not connect new build properties in good time.

Previous studies have identified that the installation of broadband into new homes can cause “development drag”. Delays to a development’s build out rate can be costly for both developers and local communities. As such, it would be advisable for Government to monitor installation timescales over the first year of the proposal and, if necessary, bring broadband providers into line with the standard installation timeframes expected of utilities companies. as outlined in recent guidance.

3.0 Question Three

Do you have any comments on this proposal for a connectivity plan? We propose that developers would be obliged to provide a simple connectivity plan for their developments to LAs. This plan would demonstrate that developers had consulted with at least two network providers to provide gigabit-capable networks and inform LAs when a site is connected.

3.1 Shropshire Council response

We know that in about 20-30% of UK there is likely to be only a single full fibre provider. Allowance within the process needs to be made for these circumstances. Assuming that a single infrastructure provider is able to provide an ‘open access’ network we believe this would meet the home owners requirements.

Should connectivity plans also consider the impending growth of small cell 5G deployment? Should ducting also be considered and deployed to street furniture on new sites?

Changes to Building Regulation Part R will require additional Local Authority resources to undertake the level of inspection and testing required. Furthermore there would need to be an increase in the fees set and, as Local Authorities are in competition, the same rules would need to be applied to the Private Sector to avoid the Local Authority becoming less competitive.

The regulatory planning process could provide a level of scrutiny either at pre-application or determination stages but in effect would then be relying on the developer to evidence what efforts they had made to consult with fibre providers.

3.2 LGA response

We support the Government’s proposal to require developers to submit an iterative connectivity plan to the planning authority. However, more clarity and guidance is needed on the process.

We understand that there will be no enforcement or regulatory body overseeing the submission of developments' connectivity plans. Instead the plans will provide an 'audit trail' to record the actions taken to connect the site in the case of a legal challenge. Whilst we do not believe receiving and storing the connectivity plan will create new costs for planning authorities, the Government has not yet set out the role it would expect of the planning authority in the case of legal challenge being brought on the developer.

We believe there could be a role for planning authorities to play, supported by clear Government guidance, to ensure developers are adhering to due process through each of the connectivity plan's iterative stages. This might also be helped by the creation of a connectivity plan template document to ensure consistency.

4.0 Question Four

(a) Do you agree with the assumption that deploying the necessary infrastructure to deliver gigabit-capable networks is best achieved when the site is being built?

4.1 Shropshire Council response

Yes. Applying a retrospective build is both costly and disruptive (Road space and reinstatement).

4.2 LGA response

The Local Government Association is not in a position to comment directly on the best timing of infrastructure deployment on site. However, we do believe there is potential for network operators to engage with local authorities at an early state to broadly identify new developments planned over the coming decades.

4(b) What technical specifications should the physical infrastructure (ducts etc) have?

4.3 Shropshire Council response

There should be adequate duct access for competitive fibre deployment to each premises and aggregation nodes.

We will the market to provide a response on technical specifications.

4.4 LGA response

Given our role, the Local Government Association is not in a position to comment on the technical specifications required of the physical infrastructure.

4(c) Do you agree that developers should deploy, and pay for, the necessary infrastructure from the in-building connections to the boundary edge of the development?

4.5 Shropshire Council response

Yes, as it will stimulate investment by Infrastructure providers. Providing passive ducting and chambers that will provide for at least 2 providers will future proof the site for competitive networks.

4.6 LGA response

We agree that developers should deploy, and pay for, the necessary infrastructure from the in-building connections to the boundary edge of the development. This would help tackle the issue that a number of councils have experienced where a network operator has been prevented from carrying broadband installation or upgrade works within a new build site as the developer is unwilling to grant access to highways before they have been adopted by the council, a process which in extreme cases can take a number of years.

5.0 Question Five

(a) Do you agree that developers should have to engage with at least two network operators who can provide gigabit-capable connections to the development?

5.1 Shropshire Council response

Please see response to Question Three.

5.2 LGA response

We agree with the proposal that developers should engage with at least two network operators. We would ask the Government to go further and require that one of the consultees be an open access infrastructure provider. This would increase the ability of new home owners to choose from a variety of retail broadband services and achieve the best price.

We would also advise that, at this operator engagement stage, the developer establishes a conversation with the council responsible for digital infrastructure deployment in the area (often the county council in a two tiered area) to explore whether there would be potential to leverage other digital infrastructure deployment programmes locally such as the Government's Local Full Fibre Networks programme, or any areas where the Universal Service Obligation is being delivered.

Finally, in a scenario where both the operator and developer cost thresholds are breached, and therefore both parties are considering a lower standard of connectivity, we believe the relevant council should be approached to help explore whether there is an opportunity to secure funding from a third party. This could prevent public funding having to step in at a later date to expensively retrofit full fibre connectivity to the premises.

5(b) What further measures could we consider to promote the availability of networks from multiple providers at an early stage to minimise costs and disruption?

5.3 Shropshire Council response

- National stimulation of the market to demonstrate the opportunities for fibre on new build sites outside of city and large towns
- All developers need to be aware of the social and economic benefits that are added from deploying full fibre networks, not least the market added value to property sale prices.
- Developers need to understand the growth and demand for IOT and 5G devices that will become more prevalent during the 2020's
- Building to new estates will also provide Infrastructure providers with additionality potential in and around deployed areas
- Favourable tax incentive to Infrastructure providers to build new networks

5.4 LGA response

Many local authorities already provide guides for developers outlining the local availability in their area to support them to connect new build premises. To complement this, the Government should consider using its digital infrastructure portal to host a register of broadband providers interested in being contacted by developers to provide a quote for connecting a new development.

6.0 Question Six

Taking £3,000 as a suggested aggregated cost cap per premise, how should costs be divided between developer and operator?

6.1 Shropshire Council response

We have noted DCMS commentary in the consultation document that: *"Cost aggregation has been suggested as a metric for identifying developments in scope. However, we understand that some stakeholders would find this difficult in administrative and logistical terms, and would prefer developments to be in scope based on number of premises (for example more than 5)."*

The operators cost threshold will need to take account of local and regional variable costs. Deploying fibre networks in rural Shropshire will be far more expensive than that in other parts of the UK. We would encourage Government to consider a central fund, or access to the Gigabit Broadband Voucher Scheme to cover any excessive costs above the threshold.

Of equal importance is consideration of the impending USO scheme which needs to dovetail into legislation that will ensure all premises have the potential to access fibre broadband.

7.0 Question Seven

What information and evidence can you provide to help refine the 'in scope sites' policy design choice - aggregated cost cap or number of premises?

7.1 Shropshire Council response

We would recommend that Government undertakes a review regionally of deployment costs for installing full fibre connectivity. Through project activity in some of our remotest areas we have found that the cost of deploying full fibre can vary significantly (£3500k - £30000k) and will far exceed the £3,000 thresholds in most cases.

A cost cap needs to be relevant to localised geography. Without regional variations rural areas could be penalised and will then be reliant upon other Government interventions (USO programme or LA led 'full fibre' (Outside/In) projects. A centralised 'top up' fund is recommended to support developments that exceed any cost cap.

7.2 LGA response

We do not have a position on how the overall cap should be split between network operator and developer, although we recognise the need to be prudent in balancing the costs faced by both parties with the right of residents to have future-proofed digital connectivity.

We note that the Government has not undertaken any modelling, as it did with the Universal Service Obligation, to understand how many developments could potentially breach the threshold of £3,000 per premises connection cost, and thus be unserved by gigabit connectivity. We advise the Government to conduct this a central modelling to fully understand the impact of this threshold.

We do not support implementing a cap based on the number of houses in a development, and would be concerned that small-scale developments in deeply rural areas could face exclusion from a gigabit connection. We strongly believe that the full economic benefits of digital connectivity can only be achieved through ubiquitous coverage.

To ensure new build rural premises are not unduly disadvantaged by the higher costs associated with installation, we believe the Government should consider new measures in the upcoming Spending Review to ensure that in cases where a small-scale development breaches the cost threshold national funding can "top up" the development to ensure gigabit provision is provided.

8.0 Question Eight

(a) Do you agree that developers should have the overall responsibility to ensure Gigabit connectivity for their developments (allowing for the fact that developers can oblige operators to connect using the 'duty to connect' provision).

8.1 Shropshire Council response

Yes. The responsibility should be on the incumbent developer who is benefitting from the added value of selling a future proofed housing stock. The argument for broadband is no different to all other service provision that is expected from the developer, such as water supply, sustainable drainage solutions, etc.

8.2 LGA Response

We believe it is right to place the overall responsibility on developers to ensure gigabit connectivity to their developments.

We believe that the duty to connect provides them with a powerful way to ensure broadband providers connect their developments. As previously mentioned, we believe the Government will need to monitor the installation infrastructure installation times to make sure that network operators' broadband deployment timescales are appropriate.

8(b) How would this policy affect small housebuilders?

8.3 Shropshire Council response

We would support a scheme that enables small developers to have access to a national 'top up' fund to support fibre installation where costs exceed the operator and developer contributions. See response to Question 6.

8.4 LGA response

Across the country, especially within deeply rural areas, there will be developments where installation costs will potentially be excessive, requiring a downgrading of connection speeds. In the case of small housebuilders, as previously mentioned, we believe the Spending Review could be an opportunity for Government to create a top up fund to support small housebuilders to cover costs that breach the developer threshold to ensure that all new builds are fully connected.

9.0 Question Nine

Do you have any comments on the proposed legislative approach? Do you have an alternative solution that would deliver gigabit-capable connections to NBDs?

9.1 Shropshire Council response

No comment

9.2 LGA response

In its recent Future Telecoms Infrastructure Review, the Government committed to consider further how its ambitions for fibre deployment can complement existing programmes including the roll out of the broadband Universal Service Obligation (USO) from 2020 to maximise investment in full fibre. With this in mind, we believe the Government needs to make clear how the delivery of the USO will align with this new build connectivity provision.

10.0 **Miscellaneous Commentary**

10.1 Shropshire Council response

All new sites should have a fibre kite mark associated to them which will support purchasers in making appropriate choices.

C. Responses to related strands of enquiry

The following detail was provided to the ongoing House of Lords Rural Economy Committee inquiry:

3.1.4 In Shropshire, **digital connectivity** is a prime illustration of an infrastructure challenge or barrier to growth that cuts across all sectors from agriculture through to retail and tourism, across all sizes of business including SMEs and start-ups, and across a demography that is ageing.

3.1.5 We have noted that Government identified “ageing society” as one of the four “Grand Challenges”, and would absolutely concur, with local challenges of ensuring access to facilities and services including digital healthcare as well as around social isolation. The Council is keen to work with Government to rise to this grand challenge, being well placed in terms of our ageing population and our strong care sector to shape the policy debate from an informed perspective and contribute towards solutions.

3.1.6 The stated policy aim is to seek to retain our young people and encourage others to move here. This necessitates policy and action to create and nurture the conditions in which there are a mix of sectors in which to work, opportunities to start and grow businesses and families, leisure and recreation activities to follow, and a range of housing tenures in which to live, across our market towns as social, well being and business hubs as well as in more rural locations. All of this requires sustainable long term assured digital connectivity.

3.1.7 Equally, our older people retain a reliance on landlines, not least for telecare, both in rural areas and in market towns, as well as making use of broadband, whilst our visitors and businesses need to be assured of the reliability of mobile coverage wherever they may be. However, the incomplete access to superfast broadband, and the inconsistent nature of mobile phone coverage, are challenges that are seen as affecting social isolation, inhibiting local growth and deterring investment and in-migration. This has been articulated to Government and through parliamentary inquiries and responses to Ofcom calls for evidence, where for example we have needed to make the point on social inclusion grounds that healthcare needs in emergency situations continue to warrant landlines at household premises.

The following detail was provided to a DCMS Inquiry in February 2017, about extending the roll out of full fibre networks. It remains relevant context for the response that we are making to this consultation, with regard to new build homes and digital connectivity.

There are 144,660 premises in the Shropshire Council area with many in very remote rural areas. 93.7% of the land is rural with 34.6% of the population residing in this area. This is unlike many of its shire counterparts, which although equally rural, have their populations in concentrated hamlets, as opposed to the widely dispersed premises in Shropshire.



[Infographic Source: Response to DCMS Inquiry, February 2017]

Shropshire continues to suffer more than virtually all other rural counties from poor digital connectivity, both from fixed and mobile provision. This is due to a combination of factors that is not limited to the commercial appetite of current network providers to deploy solutions in these sparsely populated areas, including the physical geographical challenges of the terrain and the limited number of key arterial routes.

New builds

Shropshire Council's lessons and experience of commercial deployments to new commercial/residential areas:

- Shrewsbury was originally planning for widespread commercial FTTP deployment. The majority of structures were subsequently re-planned as FTTC for commercial reasons;
- Despite regular engagement and encouragement through local and national interventions, (NHBC agreements/Local Supplier and Developer Briefing Days) new sites/estates continue to be built without fibre broadband provision;
- Some fibre suppliers inform us of their own frustrations with Developers who are not proactive in installing fibre on new housing estates and then pass the responsibility post build to the infrastructure suppliers;
- Shropshire Council would encourage consideration of planning policy to make fibre broadband a condition of developments over a specific size or where a fibre spine is within a specific and affordable distance;
- We would encourage the Government to seek competition of new fibre suppliers to new build sites which can subsequently connect into national backhaul provision;
- All developments should legislate that a fibre connection point is installed to all new premises (Building regulations), regardless of development size, with the data retained on a national database that suppliers can access.

Community schemes

Aspirations do exist within rural communities to support 'co funded' projects to enable local full fibre networks. Our local engagement with key stakeholder groups (Broadband Partnership Group) has identified a willingness for communities to part fund solutions using 'private top up'/'self-build' as match towards a public contribution.

Whilst the current model is limited to certain providers' community models, additional funding streams could unlock opportunities using Community Infrastructure Levy (CIL) and potentially local Parish precepts. State Aid, however, remains a real constraint to this potential opportunity.

Shropshire Council encourages Government to work with local bodies on developing scalable co funded schemes that could combine vouchers from local and central sources with additional match top ups from private, CIL or Parish funds.

Consideration of different approaches

Public demand side aggregation

Opportunities do exist to scope collaborative opportunities across wider stakeholder groups, including the 'one public estate' agenda, LEP partners, and cross border authorities.

Shropshire Council already works with neighbouring authorities to enable mutual benefit. This includes our active participation as a non-constituent member with partners in the West Midlands Combined Authority, our role as one of three unitary Councils in the Marches LEP and increasing cross border collaboration with partners in Mid Wales and Northern Gateway Partnership. We will look to optimise all opportunities that can improve digital infrastructure in our county. This could include working within the structures of the Local Enterprise Partnership, West Midlands Combined Authority, and Midlands Engine in making best use of property, land and network assets.

Government will need to factor in how extension of fibre broadband networks can operate across devolved national administrations as well as across existing and developing locally devolved bodies' boundaries, including how this plays across the varying status of local planning policy arrangements that may differ.

Practicalities of coordinating a public intervention project approach that meets with the State Aid conditions may add significant timescales to any opportunity as well as raising potential issues at border cross over points. Post Brexit free trade agreements will be key to defining this risk.

A commercially driven solution, without state aid subsidy could offer a favourable opportunity, but will be dependent on the market's appetite to serve premises in rural areas.

Government also needs to develop a more detailed outline model of its vision for an 'anchor' model to benefit rural communities. To date it is unclear how the Government sees the model working in practice, and at scale, without procurement complexities.

Making public sector assets available

Shropshire Council does not own any fibre, apart from some very limited CCTV legacy networks in some of our market towns. In all these areas, commercial fibre broadband is already available. The authority leases backhaul and Wide Area Network links between sites.

Physical sites and land assets are available for negotiation with any potential fixed/wireless or mobile broadband provider.

The authority would consider offering a concession to the market to use their street furniture for improved connectivity. However, it is important to note that in most cases, the areas that commercial providers are most interested in will be urbanised environments that remain well served by digital infrastructure.

The Government's review of national fibre assets as part of the 'Telecommunications and Digital Infrastructure Maps' review (Second Publication) highlighted very little opportunity in Shropshire.

Access to location data on infrastructure assets

We would encourage a GIS repository of infrastructure assets (Fibre/masts/ducts) post commissioned deployment. A database would assist the Physical Infrastructure Access (PIA) process and enable local authorities, the market and key stakeholders to review competitive opportunities. The records would need to be managed by an independent third party with responsibility for data integrity and access.

We would recommend Government look towards a number of activities to stimulate further deployment of fibre networks:

- Introduce a community fibre grant scheme for those communities who demonstrate demand and have aspirations for localised fibre deployments.
- Look at opportunities with LEPs and local bodies to bring publically funded backhaul into key unserved mobile/broadband areas that would provide key hub locations for suppliers to connect communities.
- Encourage Independent Network operators to build new networks from current dark fibre end-points in very rural areas using National Productivity Investment Funding (NPIF). Funding structures should incentivise those providers who take the most long term risk in addressing the most rural areas
- Create a Fibre on Demand (FOD) model that embraces new providers.
- Encourage the development of a competitive wholesale FTTP/FOD market nationally.

Recommendations for other changes to reduce the cost of full fibre rollout

- Introduce an obligation on all utilities to share major upgrade road space – water/fibre trenching where shared opportunities for reduced civils costs can be realised.
- Introduce planning obligations to install fibre to premises where 5+ premises exist and fibre network is within 500 metres.
- Where fibre is beyond reasonable economic distance for developer or provider introduce a new build fibre government grant.
- Wayleave obligations. Place a compulsive obligation on landowners to allow access for fibre network deployment (underground).

[Shropshire Council response ends]

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