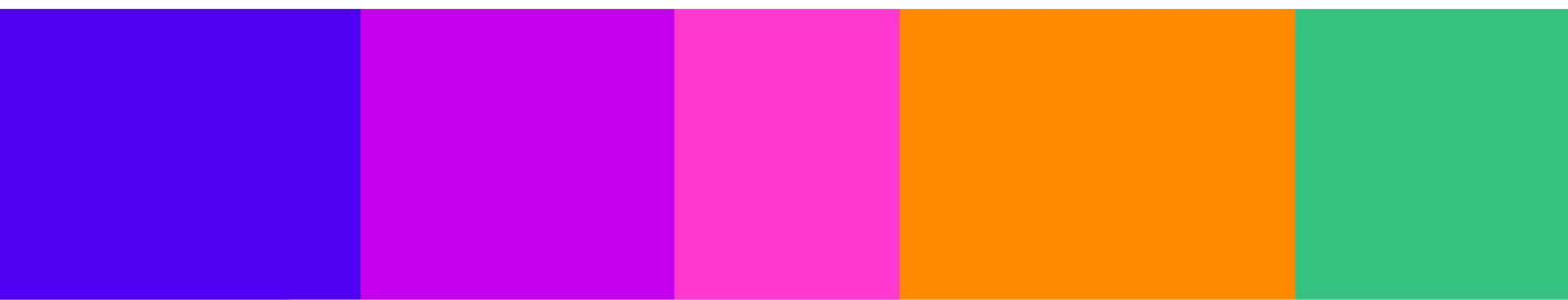


Discussion paper response form

Discussion paper title	Discussion paper: Mobile connectivity you can count on
Representing (delete as appropriate)	The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) Digital Connectivity Group About ADEPT: <i>The Association of Directors of Environment, Economy, Planning & Transport (ADEPT) is the voice of local authority place directors and their teams. Our members manage vital local services - from highways, waste, recycling and planning - while also preparing for the challenges and opportunities of the future.</i> <i>ADEPT is a membership based, voluntary organisation with members across England. We bring together directors from county, unitary, metropolitan and combined authorities, along with sub-national transport bodies and corporate partners. Collectively, our members provide services for more than 42 million people, manage 164,000 miles of road and handle around 65% of all recycled waste in England.</i> <i>ADEPT members develop long term strategies, investment and infrastructure needed to make their places resilient, sustainable, inclusive and prosperous. They drive clean, sustainable growth, delivering the programmes that are fundamental to creating more resilient communities, economies and infrastructure. These services include housing, environmental and regulatory services, planning, economic development, culture and highways and transport.</i> About the ADEPT Digital Connectivity Working Group The Digital Connectivity Working Group was established in 2018 to bring together digital infrastructure leads to help facilitate the delivery of improved broadband and mobile connectivity at the local level. The group has extensive collective delivery experience and would be happy to discuss further any aspects of the response below.
Organisation name	The Association of Directors of Environment, Economy, Planning and Transport (ADEPT)



Your response

Question	Your response
Section 2: The quality of mobile connectivity we want to see - What are your views on the use of the Map Your Mobile good performance metric and how should the measure evolve over time? What are your views on the usefulness of: - the 90% figure as a benchmark applicable across geographies and based on crowdsourced data?, and - Whether the 90% benchmark is realistic and sufficiently ambitious?	Confidential? – N ADEPT supports Ofcom’s proposed shift from a coverage-led view of mobile networks to a real-world performance metric. We agree that residents, businesses, public services and visitors are less concerned with whether a theoretical signal exists and more concerned with whether the connection reliably supports everyday tasks such as video calls, online forms, banking, maps, payments, care-related services and emergency communications. The Map Your Mobile good performance metric is a helpful and pragmatic starting point because it combines download speed, upload speed and latency. We welcome the use of crowdsourced data because it provides a stronger indication of lived experience than predicted coverage alone. However, the measure should evolve over time. Consumer expectations, digitally enabled public services, connected transport, remote and hybrid working, IoT-enabled services and business uses are all increasing the need for dependable mobile connectivity. Ofcom should therefore review the metric regularly and consider adding measures such as jitter, packet loss, time-to-first-byte, indoor/outdoor distinction, peak-time performance and consistency by operator. It should also be clear where crowdsourced data may under-represent the worst served rural locations because data is only captured where users have a signal and are able to test. We consider the 90% benchmark to be useful as a national reference point and would represent a meaningful step-change from current UK performance, where Ofcom’s analysis suggests good performance is currently achieved less than eight out of ten times. The benchmark is also helpful for local authorities because it can support prioritisation and provide a consistent basis for discussing improvement plans with mobile network operators. The 90% should not be treated as a ceiling, nor should it obscure localised problems. A county may appear to be improving overall while some rural communities, transport corridors, market towns, visitor destinations or public-sector sites remain poorly served. Ofcom should therefore report both national progress and local variation, including postcode district-level analysis and rurality breakdowns. This would enable persistent not-spots and weak-spots to be identified and addressed. We would also like further consideration to be given to the performance of 999 calls from mobile users. We have had concerning reports of mobile users failing to be able to contact emergency services in populated areas because of mobile network coverage and capacity issues.

Question	Your response
Section 3: Market-led improvements in mobile network quality • What information do customers need about network quality to choose the best network for their needs, and where are the main gaps in current provision of that information? • How well does Map Your Mobile currently meet customer and stakeholder needs, and what specific improvements would make it more useful?	Confidential? – N Customers need clear, independent and locally meaningful information about network quality in the places that matter to them. This should include not only predicted outdoor coverage, but actual performance, reliability, indoor experience where available, peak-time performance and variation between operators. For many residents and businesses, particularly in rural areas, the relevant question is not “is there coverage somewhere nearby?” but “will my phone work reliably in my village, workplace, school route, town centre, visitor destination or train journey?” The main gaps in current provision are: limited public understanding of the difference between predicted coverage and real-world performance; insufficient local granularity; limited information about indoor and busy-period performance; and limited ability to compare operator performance across places that matter to residents, businesses and public services. Vulnerable residents, small businesses, visitors and people using digital public services also need information that is presented in plain English and in an accessible format. Map Your Mobile is a positive and important step. It provides an independent national source of evidence and, by incorporating crowdsourced performance data, moves the conversation beyond coverage maps alone and we welcome Ofcom’s intention to continue developing the tool. We are concerned, however, that there can be significant differences between the Map Your Mobile data sets and the results from Streetwave commissioned surveys – with the Map your Mobile data being considerably more optimistic about available coverage. We are also concerned that it can underplay the challenges of rural connectivity as crowd-sourced rural coverage results can fail to register if there is insufficient connectivity. To make Map Your Mobile more useful, we would welcome: a) downloadable local authority-level and postcode district-level datasets; b) clearer operator comparisons; trend data over time; c) ability to distinguish rural, urban, indoor, outdoor and transport corridor performance (a number of areas continue to highlight the importance of road coverage, especially for business users); d) clearer confidence indicators where crowdsourced sample sizes are low and further consideration to what can be done to overcome issues with crowd-sourced data in rural locations; e) accessible outputs that local authorities can use in member briefings, planning discussions and engagement with communities. Ofcom should also consider providing data exports so councils can combine Map Your Mobile data with local assets, planning constraints, deprivation, business locations, visitor economy areas, care locations and transport routes.

Question	Your response
	As we highlight below, access to better local mobile data is absolutely critical for supporting the work that local authority infrastructure teams undertake to support the deployment of new mobile infrastructure.
Section 4: Connectivity in busy areas • What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why? • What do you think should be Ofcom's main priorities for our future work in this area? • What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom to provide further insights on and why?	<i>What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?</i> ADEPT members have extensive experience of trying to facilitate mobile connectivity improvements in both busy and rural areas. Network congestion is often worse at peak times, especially around transport hubs, visitor destinations, retail areas, events and the night-time economy. Historic streetscapes, conservation areas, listed buildings, challenges around permitted developments for small cells and competing demands on the public realm can all make deployment harder. Through our work, we are finding that the following issues can create significant barriers to improving mobile connectivity: a) The unwillingness of some MNOs to utilise or participate in neutral host small cell solutions. Neutral host infrastructure, small cells and multi-functional street assets could play a much greater role in town and city centres, but their impact is limited where there is insufficient take-up by mobile network operators. Local authorities are often approached by neutral host providers looking to deploy small cells on street lighting assets to improve connectivity in areas where there are gaps or capacity issues with the existing mobile macro network. Where these agreements have been activated, ADEPT members have frequently encountered numerous challenges in reutilising assets, including accommodating the necessary equipment on existing street lighting columns due to load bearing constraints and other existing uses (which can mean assets cannot accommodate additional telecoms equipment). The infrastructure sharing capabilities of neutral host providers can offer a way to mitigate some of these issues by reducing the number of small cells required in a specific locality – although this is dependent on the willingness of MNOs to participate and take-up these opportunities. Unfortunately, we are finding that some MNOs do not appear to be willing to utilise new small cell infrastructure which is limiting the impact of these solutions to improve local mobile connectivity coverage and capacity. A number of ADEPT members have also been working with neutral host tower providers such as Atlas and Icon Tower to help resolve longstanding coverage gaps in their local authority areas. Again the ability of these solutions to work for all mobile users depends on the willingness of each mobile network operator to take up these coverage opportunities. Unfortunately, some mobile network operators are unwilling to engage with these new neutral host opportunities, despite the obvious benefits for their customers, network coverage and performance. b) New development negatively impacting existing mobile connectivity and performance

Question	Your response
	New development is rarely planned with mobile connectivity in mind. ADEPT members have seen schemes lead to the loss of existing mobile infrastructure (e.g. through notice to quit), block or degrade existing signals, and overwhelm network capacity once occupied. Developers should therefore be required to engage with MNOs at the earliest stages so the impact on existing and future mobile networks is properly assessed and addressed. c) Continued opposition to mobile infrastructure Given that there has been significant issues with misinformation and 5G related conspiracy theories, we would ask Ofcom to continue to work with Government and the UK Health Security Agency to tackle the barriers and concerns generated by misinformation which can create significant local opposition to new mobile infrastructure proposals. There is also a need to ensure that mobile infrastructure is appropriately sited and the visual impacts mitigated wherever possible, particularly in historic and sensitive environments. d) Lack of clarity within existing permitted development rights for small cells Greater clarity is needed on how local authorities can use Part 12 GPDO powers alongside Part 16 Code Operator rights to support mobile infrastructure on public assets. This should make clear that councils can install multi-functional columns and street furniture capable of hosting telecoms equipment, and that operators can use those assets without unnecessary additional planning barriers where the assets are publicly owned and locally accountable. Please note the regulations currently give examples of permitted development as ‘horse troughs’ and ‘telephone boxes’ as ‘structures or works required in connection with the operation of any public service administered by them’ when both are now examples of obsolete infrastructure within our street scenes. e) Lack of access to more granular, location-based mobile data for local authorities It is frustrating that digital infrastructure teams in local authorities can still not get access to sufficiently granular, area based data about mobile network coverage and the quality of these networks without investing in expensive, independent data collection contracts. The lack of availability of good, area based mobile network data stymies the work of these teams, particularly in relation to their engagements with neutral host providers who have expressed an interest in investing in new infrastructure to tackle capacity and coverage not spots, where these can be evidenced/known. We would welcome Ofcom considering how a national approach to sharing consistent local-area datasets with local authorities (with appropriate safeguards) could be developed to accelerate problem-solving and support the development of targeted interventions. f) Poor visibility of MNO upgrade/investment plans.

Question	Your response
	In comparison to fixed broadband operators, many MNOs are unwilling to share or engage with digital infrastructure teams regarding plans to deploy new infrastructure. This significantly reduces the ability of these teams to facilitate and broker support, particularly where planning or street works permits are required. Accommodating the volume of street works requests from all utility providers has been a significant challenge, as all highways teams have a legal duty to keep the road network running. Working with local authorities and giving advanced visibility of deployment plans can significantly reduce the risks of unhelpful delays because of other competing permit requests for the same road space. Sharing better information with digital infrastructure teams could significantly boost and help enable MNO deployment plans. <i>What do you think should be Ofcom's main priorities for our future work in this area?</i> Ofcom's main priorities should be to strengthen the local evidence base, improve transparency on predicted versus real-world mobile performance, and support more effective collaboration between MNOs, neutral host providers, infrastructure providers and local authorities. This should include identifying good practice in planning, highways coordination and asset access, and advising Government where targeted planning or permitted development reforms could accelerate deployment while protecting local place-making, heritage and public-realm responsibilities. ADEPT members would welcome Ofcom working with the Government on the following areas: a) Neutral host solutions: Review what more Ofcom could do to enable and encourage MNO participation, as wider take-up could substantially improve town-centre connectivity. b) New development: Press for mobile connectivity impacts to be considered and planned for at the earliest stages of new housing, regeneration and major development schemes. c) Misinformation and public confidence: Continue working with the UK Health Security Agency and Government to provide clear, trusted information that helps address misinformation and local opposition to mobile infrastructure. d) Permitted development rights: Press for greater clarity on how local authorities can use Part 12 powers to support small-cell deployment on public assets alongside Part 16 Code Operator rights. g) Granular local data: Improve local authority access to location-based mobile coverage, capacity and performance data to support investment, planning and targeted barrier-busting. e) MNO engagement: Encourage better advance engagement and data sharing by Mobile Network Operators, including where information can be shared safely under non-disclosure agreements. <i>What information would stakeholders, especially local authorities / planning authorities find useful for Ofcom to provide further insights on and why?</i>

Question	Your response
	Local authorities and planning authorities would find it most useful for Ofcom to provide practical, place-based evidence that helps them understand where mobile performance is falling short, why it matters, and what interventions are most likely to improve outcomes. This should include: • Granular local performance data: Postcode district, neighbourhood or smaller-area maps showing coverage, capacity and real-world performance, including operator-level comparisons where appropriate. This would help councils identify persistent not-spots, capacity constraints and locations where reported coverage does not match residents' and businesses' lived experience. • Predicted versus real-world performance: Clearer evidence showing the difference between modelled coverage and actual user experience, including indoor and outdoor performance, peak-time congestion, transport corridors and busy visitor or town-centre locations. This would help planning authorities understand whether an area that appears "covered" is still experiencing poor service in practice. • Evidence on network capacity and future demand: Insight into where mobile quality is likely to be affected by new housing, regeneration, transport schemes, employment growth, visitor-economy activity or major events. This would support earlier engagement between developers, MNOs, neutral host providers and local authorities so that mobile connectivity is planned alongside fixed broadband, power, transport and other essential infrastructure. • Public benefit evidence for planning decisions: Plain-English material explaining how improved mobile connectivity supports economic activity, emergency resilience, digital inclusion, education, health and care, transport, public services and access to digital payments. This would help planning authorities balance visual, heritage and public-realm considerations against the wider public benefits of improved connectivity. • Good practice and case studies: Examples of how councils have enabled small cells, neutral host deployment, public asset use, planning and highways coordination, and improved engagement with MNOs. This would help authorities move from identifying problems to delivering practical solutions. • Clearer guidance on public assets and permitted development: Further insight into how local authorities can use public assets, street furniture and Part 12 powers alongside Part 16 Code Operator rights to support small-cell deployment while protecting local place-making, heritage and amenity responsibilities. • Operator engagement and investment visibility: Better information on MNO upgrade plans, planned interventions and opportunities for safe data sharing, including through non-disclosure agreements where necessary. This would allow digital infrastructure, planning and highways teams to remove avoidable barriers, coordinate street works and support timely deployment.

Question	Your response
	Overall, Ofcom's insights would be most valuable where they support practical local action: helping authorities evidence need, prioritise intervention, engage constructively with industry, inform local plans and infrastructure delivery plans, and explain to communities why well-sited mobile infrastructure is essential to resilient, inclusive and economically productive places.
Section 5: Connectivity in indoor, shared public places • What do you think are the biggest barriers to achieving better mobile performance indoors and why? • What do you think should be Ofcom's main priorities for our future work in this area? • What information would you find useful for Ofcom to provide further insights on in relation to connectivity indoors and why?	Confidential? – N We agree that the biggest barriers to better indoor mobile performance are building materials, building design, high user density, limited commercial alignment and lack of early consideration of connectivity in building development or refurbishment. Modern buildings can block radio signals, while large venues, shopping centres, transport interchanges, hospitals, libraries, leisure facilities and civic buildings may require dedicated indoor solutions. Relying solely on outdoor macro networks is often insufficient. A further barrier is that responsibilities are fragmented. Building owners may want all visitors to have good connectivity, while individual MNOs may prioritise investment that benefits only their own customers. Neutral host solutions, distributed antenna systems and high-quality Wi-Fi can help, but they require commercial agreements, access, power, backhaul and clear ownership of ongoing costs. Ofcom's priorities should be to develop practical guidance for building owners, landlords, developers, public-sector estate managers and local authorities. Indoor connectivity should be considered early in the design and refurbishment process, particularly for high-footfall public buildings and places where connectivity supports public safety, accessibility, payments, ticketing, navigation or service delivery. We would welcome Ofcom insights on: which indoor solutions are appropriate for different building types; model procurement and neutral host approaches; examples of successful multi-operator indoor deployments; guidance for councils and other public bodies when refurbishing civic buildings; and evidence on the costs and benefits of dedicated indoor infrastructure. It would also be helpful for Ofcom to work with Government and industry to consider whether building standards, planning guidance or public-sector estate guidance should better reflect digital connectivity as core infrastructure.
Section 6: Connectivity on trains • What do you think are the biggest barriers, technical and commercial, to achieving better mobile performance	Confidential? – N We agree that train connectivity is a major issue and is one that digital infrastructure team frequently receive stakeholder complaints about. We therefore welcome Ofcom's work with Government to improve outcomes.

Question	Your response
on trains? Which are most significant and why? • Do you agree with our proposal to work with government to support improvements in train connectivity? • What information would you find useful for Ofcom to provide further insights on in relation to connectivity on trains and why?	The biggest technical barriers are signal penetration into train carriages, rural and cutting/tunnel environments, speed-related handover between cells, limited trackside infrastructure, and high passenger demand on busy and peak services. Commercial barriers are equally significant: MNOs may not see sufficient return from investing along rail corridors, TOCs face cost and monetisation challenges, and responsibilities are split across MNOs, Network Rail, TOCs, rolling-stock owners, Government and infrastructure providers. We are supportive of Ofcom’s proposal to work with Government, DfT, DSIT, NISTA, Network Rail, TOCs and industry. A coordinated approach is needed because rail connectivity is unlikely to be solved by market forces alone. The transition to future rail communications systems and investment in LEO satellite, track-to-train, neutral host and improved cellular backhaul should be considered together rather than as isolated interventions. Ofcom should provide route-level and segment-level performance data, including operator comparisons, on-board Wi-Fi performance, peak/off-peak differences, and identified causes of poor performance. For local authorities, it would be useful to understand where rail connectivity issues intersect with wider local mobile not-spots, rural corridors, growth areas, stations and visitor economy routes. Ofcom should also provide evidence on which interventions are most cost-effective for different route types, including commuter, intercity, rural and cross-country services.
Section 7: Connectivity in rural areas • What do you think are the biggest barriers to achieving better mobile performance in rural locations and why? • What do you think should be Ofcom’s main priorities for our future work in rural locations and what outcomes should we aim to achieve? • What solutions (technical, commercial, policy or delivery) could improve rural mobile performance?	Confidential? – N <i>What do you think are the biggest barriers to achieving better mobile performance in rural locations and why?</i> We have seen many mobile not-spots persist throughout the deployment of 3G, 4G and 5G infrastructure – and BDUK’s Shared Rural Network initiative. Whilst we recognise the technical and commercial challenges to improving mobile connectivity, we are also concerned that the persistent perception of rural areas as economically marginal or unpopulated can undermine the need for further investment in these areas – not recognising the technology-dependent nature of modern-rural economies (land-based and rurally-located businesses) as well as the additional demand from visitors. A further challenge is that rural problems are often highly localised and can be masked by broad coverage reporting. A parish, hamlet, road corridor, farm cluster, tourism site or public-sector facility may experience poor performance even when the wider local authority area appears adequately served. Crowdsourced data is valuable but can under-represent the worst-

Question	Your response
What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?	served places because tests are less likely to be generated where people have no usable signal. This makes granular evidence essential. <i>What do you think should be Ofcom's main priorities for our future work in rural locations and what outcomes should we aim to achieve?</i> Ofcom's main priorities should be to provide clearer local evidence on rural performance, strengthen transparency around where coverage obligations are and are not delivering real-world outcomes, and support coordinated action between Government, Ofcom, MNOs, infrastructure providers and local authorities. Ofcom should also help ensure that rural connectivity is treated as essential infrastructure supporting economic growth, public service transformation, visitor economy, health and care, transport, farming, emergency response and digital inclusion. There is also a particular need, post PSTN migration, to ensure that communities have resilient and reliable telecommunications – with many ADEPT members reporting increased concerns from areas with poor mobile coverage about how they can contact blue light services in the event of power and fixed broadband outages. The outcomes Ofcom should aim to achieve are: fewer total and partial not-spots; improved reliability across rural settlements and road corridors; better indoor and outdoor experience in villages and community facilities; greater operator choice; better resilience for emergency and public-service use; and a clearer route for local authorities to use data when engaging with MNOs, landowners, planning teams and communities. <i>What solutions (technical, commercial, policy or delivery) could improve rural mobile performance?</i> A mix of technical, commercial, policy and delivery solutions will be needed. These include continued infrastructure sharing; neutral host models; use of public-sector assets where appropriate; better engagement with landowners and estate owners, targeted interventions for known not-spots; and earlier engagement between operators and local planning authorities. Local authorities can play a constructive role by convening partners, sharing local evidence, supporting access to suitable public assets, aligning connectivity with local growth and inclusion priorities, and helping communities understand proposed infrastructure. However, councils need better evidence, earlier engagement from industry, and better local data to support planning and stakeholder conversations. There has been widespread disappointment that there has been little step-change in mobile connectivity across England as a result of the recent Shared Rural Network initiative, despite many localities having persistent rural connectivity issues. We would welcome further consideration to how a successor initiative could deliver the required connectivity uplifts across England's rural communities – and work more collaboratively with local digital infrastructure teams to deliver the required infrastructure.

Question	Your response
	We also share Ofcom’s concerns around satellite direct-to-device services. Whilst the integration of satellite and other non-terrestrial technologies could help address some of the most difficult coverage and resilience challenges, it will be important that there is not an over-reliance on non-terrestrial technologies that could diminish the perceived need for investment in rural terrestrial networks – as the continued investment in the latter needs to remain a strategic priority. Many rural communities and businesses continue to flag issues around higher costs of living so it will be important that access to mobile connectivity remains affordable and accessible to all consumers. We believe that satellite networks are unlikely to be able to match the capacity and latency performance to compete with terrestrial services so it is vital that this complementary rather than replacement principle is reflected in the UK’s mobile infrastructure policies, moving forward. <i>What information would you find useful for Ofcom to provide further insights on in relation to rural connectivity and why?</i> We would find it useful for Ofcom to provide rural performance data at a much more granular level, including parish, postcode district, road corridor and operator-level views where possible. Data should distinguish between predicted coverage and real-world performance, indoor and outdoor experience, 4G and 5G availability, peak-time performance, confidence levels in crowdsourced samples, and whether a location is served by one, some or all operators. Trend data over time would also help councils understand whether interventions are making a measurable difference. Ofcom should also provide practical rural case studies showing what has worked in different contexts, including shared rural sites, public asset use, planning good practice, neutral host deployment, rural transport corridors, visitor economy locations and hard-to-reach communities. This would help local authorities and operators move from identifying problems to delivering solutions. For ADEPT members, the most useful evidence will be data that supports practical place-based action, not just national reporting. Finally, we would encourage Ofcom to undertake capacity assessments for satellite direct-to-device services and satellite-based broadband services to provide a robust evidence base to support hard-to-reach digital infrastructure policy and future programme development.

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Submission Deadline: 29th July 2026, 5pm.