Reference: 02297702

Information Requests
information.requests@ofcom.org.uk

3 November 2026

Freedom of Information request: Right to know request

Thank you for your request for information concerning telecommunications resilience, relevant to Walney Island.

We received this request on 6 October 2026, and we have considered your request under the Freedom of Information Act 2000 (the "FOI Act") and the Environmental Information Regulations 2004 (the "EIR").

Your request & our response

1. Mobile Communications Infrastructure and Dependencies

Please provide information on:

- ***available coverage information for Walney Island (e.g. 2G, 4G, 5G coverage)***

This information can be obtained using Map Your Mobile.
Specific address/postcode information may be available from our API.

- ***principal communications infrastructure serving Walney Island***
- ***mainland-to-island communications dependencies***

We do not hold this information.

- ***key assets, exchanges, fibre routes, backhaul arrangements, masts, or network infrastructure supporting communications services***

We do not hold information in relation to 'key assets' - we are unable to ascertain what you mean by it. We also do not hold information on fibre routes or backhaul arrangements.

We do hold data on mast sites and some network infrastructure (exchange and cabinet locations). However, this is provided to us for the purposes of our Connected Nations report. We have considered this in light of the relevant statutory scheme. We have also considered advice from HM Government on the potential implications of disclosure of information relating to the specific location of mobile sites (and other information relating to mobile sites) in the context of national security. HM Government has raised significant concerns with Ofcom about the release of this type of information on national security grounds and has advised that disclosure of this type of information would adversely affect national security. Taking this into account, Ofcom considers that regulation 12(5)(a) of the EIR applies to your request for the location of mobile masts as we consider that disclosure of the information would adversely affect national security.

In applying this exception, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex A sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

- ***known single points of failure affecting communications continuity to Walney Island***

We do not hold this information.

Where available, please provide:

- ***approximate locations of strategic assets serving Walney Island***

We do not hold this information as we are unable to ascertain what you mean by 'strategic assets'.

- ***infrastructure clusters or locations where disruption could affect multiple services or providers simultaneously***

We may hold information on exchange locations where multiple operators terminate services. We have considered this in light of the relevant statutory scheme. We have also considered advice from HM Government on the potential implications of disclosure of information relating to the specific location of mobile sites (and other information relating to mobile sites) in the context of national security. HM Government has raised significant concerns with Ofcom about the release of this type of information on national security grounds and has advised that disclosure of this type of information would adversely affect national security. Taking this into account, Ofcom considers that regulation 12(5)(a) of the EIR applies to your request for the location of mobile masts as we consider that disclosure of the information would adversely affect national security.

In applying this exception, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex A sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

- ***any known dependencies on mainland infrastructure that are critical to continuity of service***

We do not hold this information.

Where possible, please indicate:

- ***known resilience measures already in place***

We do not hold this information for fixed networks.

We do hold power backup data for mobile masts. We have considered this in light of the relevant statutory scheme. We have also considered advice from HM Government on the potential implications of disclosure of information relating to the specific location of mobile sites (and other information relating to mobile sites) in the context of national security. HM Government has raised significant concerns with Ofcom about the release of this type of information on national security grounds and has advised that disclosure of this type of information would adversely affect national security. Taking this into account, Ofcom considers that regulation 12(5)(a) of the EIR applies to your

request for the location of mobile masts as we consider that disclosure of the information would adversely affect national security.

In applying this exception, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex A sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

- ***any assets or locations known to be vulnerable to flooding, coastal change, groundwater flooding, or restricted access***
- ***whether particular locations present greater resilience or continuity challenges than others***
- ***locations where communications infrastructure may be exposed to flooding, coastal change, groundwater flooding, or restricted access***
- ***any known infrastructure vulnerabilities specifically relevant to Walney Island:***

We do not hold this information.

2. Backup Power and Operational Resilience

One of the key objectives of the RAPA is to understand how disruption affects communications continuity.

Please provide information on:

- ***typical backup power arrangements associated with mobile communications infrastructure***
- ***indicative backup power durations, where available***
- ***differences in resilience arrangements across operators or infrastructure types***

We do hold power backup data for mobile masts. We have considered this in light of the relevant statutory scheme. We have also considered advice from HM Government on the potential implications of disclosure of information relating to the specific location of mobile sites (and other information relating to mobile sites) in the context of national security. HM Government has raised significant concerns with Ofcom about the release of this type of information on national security grounds and has advised that disclosure of this type of information would adversely affect national security. Taking this into account, Ofcom considers that regulation 12(5)(a) of the EIR applies to your request for the location of mobile masts as we consider that disclosure of the information would adversely affect national security.

In applying this exception, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex A sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

- ***dependencies on power supply and supporting infrastructure***

We do not hold this information.

Where possible, please indicate:

- ***how long communications infrastructure can continue operating during power outages***

We do hold power backup data for mobile masts. We have considered this in light of the relevant statutory scheme. We have also considered advice from HM Government on the potential implications of disclosure of information relating to the specific location of mobile sites (and other information relating to mobile sites) in the context of national security. HM Government has raised significant concerns with Ofcom about the release of this type of information on national security grounds and has advised that disclosure of this type of information would adversely affect national security. Taking this into account, Ofcom considers that regulation 12(5)(a) of the EIR applies to your request for the location of mobile masts as we consider that disclosure of the information would adversely affect national security.

In applying this exception, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex A sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

General resilience information at the National level regarding mobile networks can be found in our report: Mobile RAN power resilience: Technical report and CFI update.

- ***whether resilience varies across different asset types***
- ***conditions under which backup arrangements become insufficient***
- ***operational constraints associated with prolonged loss of power***
- ***dependencies that may affect maintenance, restoration, or recovery activities***

We do not hold this information.

3. Service Disruption, Failure Modes and Recovery

Please provide information on:

- ***principal causes of communications disruption affecting coastal or island communities***

We do not hold this information.

- ***historic disruption events, where available***

We hold no incident reports that affect only Walney Island - these would likely fall below our incident reporting thresholds.

- ***known causes of service degradation or outage***

We hold no incident reports that affect only Walney Island

- ***recovery arrangements and restoration priorities***
- ***arrangements for communicating significant outages or disruption events***

We do not hold this information.

Where possible, please indicate:

- ***whether impacts are immediate or progressive***
- ***how disruption escalates over time***
- ***expected recovery times following disruption***
- ***factors that most influence recovery duration (e.g. weather, access, contractor availability, specialist resources, power dependency)***

- ***any known impacts on communities, services, or critical functions when telecommunications continuity is disrupted***
- ***which services or functions are likely to experience the greatest impacts***

We do not hold this information.

4. Infrastructure Resilience and Continuity Arrangements

Please describe:

- ***resilience measures already implemented across the mobile communications sector***

Please refer to our Mobile RAN power resilience: Technical report and CFI update.

- ***resilience expectations, standards, guidance, or common approaches relevant to service continuity***

Please refer to our Statement: Network and Service Resilience Guidance.

- ***continuity arrangements used during disruption***
- ***operational workarounds available where infrastructure becomes unavailable***

We do not hold this information.

Where possible, please indicate:

- ***operational thresholds or trigger points relevant to communications continuity***
- ***circumstances under which continuity arrangements become constrained***
- ***lessons identified from previous disruption incidents affecting communications infrastructure***

We do not hold this information.

5. Future Resilience and Adaptation Considerations

We are interested in understanding future resilience challenges and adaptation opportunities associated with communications services supporting Walney Island.

Please provide information on:

- ***key resilience challenges expected over the next 10 to 20 years***
- ***anticipated impacts of flooding, coastal change, extreme weather, power disruption, or access Constraints***

We do not hold this information.

- ***future risks affecting continuity of communications services***

This is broadly addressed in the resilience guidance Network and Service Resilience Guidance for Communications Providers

- ***resilience improvements that could strengthen communications reliability***

We do not hold this information.

- ***adaptation measures, resilience initiatives, or policy developments currently being considered***

Adaptation measures and resilience initiatives are primarily the responsibility of Communications Providers. Relevant information may be found at the cross government/industry forum (Electronic Communications - Resilience & Response Group (EC-RRG): Electronic Communications Resilience &

Response Group (EC-RRG) - GOV.UK. Ofcom's policy options with respect to resilience remain under constant review.

In relation to policy developments, we consider that regulation 12(4)(b) of the EIR is engaged because the costs involved in answering would be disproportionate. Specifically, this would involve searching the whole of an inbox of various members of staff. We consider that undertaking this further analysis would be manifestly unreasonable in a context where:

this would unreasonably divert resources; and

the final information provided would be wholly informal discussions, thoughts and ideas not drafted for public use.

In applying the exception set out in regulation 12(4)(b) of the EIR, Ofcom has balanced the public interest in withholding the information against the public interest in disclosing it and decided that in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosure. In assessing this, under regulation 12(2), we have also applied a presumption in favour of disclosure. Annex B sets out the exception in full, as well as the factors we considered when deciding where the public interest lay.

We have considered whether this question could be refined to make it more manageable and, therefore, not manifestly unreasonable, for instance by focusing on a particular policy area. However, the term 'policy development currently in consideration' is too wide and so it would not make a difference to burden and resources required to complete the request - as such we consider regulation 12(4)(b) is engaged. You may wish to consider submitting a narrower request specifying a particular document which you are after.

Where possible, please indicate:

- ***barriers to resilience improvements***

Please refer to our February 2025 report for a summary of responses to our CFI on power backup: Mobile RAN power resilience: Technical report and CFI update

- ***priorities for future investment***
- ***opportunities to strengthen communications resilience for Walney Island communities***

We do not hold this information.

Yours sincerely,

Information Requests

Request an internal review
If you are unhappy with the response you have received to your request for information, or think that your request was refused without a reason valid under the law, you may ask for an internal review. If you do, it will be subject to an independent review within Ofcom. We will either uphold the original decision, or reverse or modify it.

If you would like to ask us to carry out an internal review, you should get in touch within two months of the date of this letter. There is no statutory deadline for us to complete our internal review, and the time it takes will depend on the complexity of the request. But we will try to complete the review within 20 working days (or no more than 40 working days in exceptional cases) and keep you informed of our progress. Please email the Information Requests team (information.requests@ofcom.org.uk) to request an internal review.

Taking it further
If you are unhappy with the outcome of our internal review, then you have the right to complain to the Information Commission.

Annex A

Regulation 12(5)(a) of the Environmental Information Regulations 2004

The exception

Regulation 12(5)(a) of the Environmental Information Regulations 2004 – a public authority may refuse to disclose information to the extent that its disclosure would adversely affect international relations, defence, national security or public safety.

The regulation is engaged because disclosure of this information would adversely affect national security.

The public interest test

Regulation 12(5)(a) is subject to the public interest test.

Key points:

Ofcom can refuse to disclose information under this exception only if in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosing the information. In assessing this, under regulation 12(2), Ofcom must also apply a presumption in favour of disclosure.

In carrying out the public interest test, Ofcom should consider the arguments in favour of disclosing the information and those in favour of maintaining the exception, attaching the relative weight to each argument (for and against disclosure) to decide where the balance of public interest lies.

We have set out the matters Ofcom have considered in reaching its decision with respect to the public interest below.

Factors for disclosure	Factors for withholding
• **Transparency:** There is always a general public interest in transparency. The EIR implements EU Directive 2003/4/EC on public access to environmental information. Recital 1 of the preamble to the Directive states this public interest: *"Increased public access to environmental information and the dissemination of such information contribute to a greater awareness of environmental matters, a free exchange of views, more effective participation by the public in environmental decision-making and, eventually, to a better environment."*	HM Government has advised Ofcom that: • Disclosure of this type of information raises significant concerns on national security grounds and would adversely affect national security. • Specifically, disclosure of this type of information would create an increased threat to the UK's Critical National Infrastructure (CNI). CNI is those critical elements of infrastructure (including assets, facilities, systems, networks or processes), the loss or compromise of which could result in major detrimental impact on the confidentiality, integrity, and availability of networks, or delivery of essential services (including those of the emergency services).

• **Accountability:** Mobile sites produce electromagnetic fields (EMF) or radio waves. At high enough levels, EMF can impact public health. As a result, the UK Health Security Agency (previously known as Public Health England (PHE)), an expert health body, advises that spectrum users should ensure that EMF levels comply with the internationally agreed levels in the ICNIRP Guidelines. Some individuals may have concerns about the potential health effects of EMF and want to know the location of any mobile site in their local area and whether the EMF levels from such mobile sites comply with the levels in the ICNIRP Guidelines. • **Information already in the public domain:** Some local planning authorities have published information on the location of mobile sites (including on proposed sites). Information on mobile site locations is also available on some open-source websites and mobile network operators' (MNOs) websites may indicate the general location of some masts (as well as future roll-out plans). • The location of mobile sites and other technical data is published in some other countries including in Ireland, France and Australia.[1]	• Government has strong concerns about publishing this type of information and has advised that publishing information on mobile sites constitutes a security risk (in particular, publishing aggregated information in a single dataset). • Government's concerns centre on four areas: 1. **Espionage/sabotage:** Publishing this type of information could enable an attacker to remotely survey which mobile sites would be of interest from an espionage, sabotage or disruption perspective (in particular if we were to publish information relating to a large number of mobile sites in the UK). 2. **Jamming:** Publishing this type of information could enable the jamming of radio signals. 3. **Physical security:** Information relating to hub sites (mobile sites that act as their own radio coverage site and also serve to 'daisy chain' other sites), switch sites, and data centres would be of particular concern from a national security perspective. The physical security of hub sites will become even more important as features such as Mobile Edge Computing become widely available. 4. **Developments in emergency services communications:** In the future, knowledge of commercial networks could help enable an attacker to target the UK's emergency service communications network to a degree that knowledge would not have enabled in the past. This is due to the Emergency Services Network programme switching emergency service communication from the private Airwave network to a commercial network.

[1] http://siteviewer.comreg.ie/#explore (Ireland); https://www.cartoradio.fr/index.html#/cartographie/stations (France); https://web.acma.gov.au/pls/radcom/site_proximity.main_page/ (Australia).

	• Government has acknowledged that where detailed technical information is not requested, an attack is more difficult. However, site location provides the starting point for an attack to gain and build additional and more detailed information that may then make any subsequent attack more likely to succeed. Taking into account the factors in favour of disclosure, and Government's advice, we have also taken into account the following: • We consider the national security risks associated with disclosing the location of mobile sites in a single, aggregated and user-friendly data set to raise a different and higher national security risk than the ad hoc disclosure of some mobile site locations as part of a planning process. We also consider that relying on information published by planning authorities is, for example, likely to make it much harder for a bad actor to coordinate an attack. This is because there may be incomplete information held by planning authorities, information may be difficult to obtain from the planning authorities and it is likely to take a significant amount of time to build up any meaningful dataset. For example, some local planning data has not been updated for several years. Further, MNOs' websites only provide general location information and do not disclose specific site locations. • Current open-source options are of much more limited use to a potential attacker than the data being requested - the data set being requested has the potential to be more damaging due to both its granularity and authoritative status.

	• On accountability, we do not set EMF safety levels, but we do carry out proactive testing of EMF levels near to mobile sites to check they comply with the internationally agreed levels in the ICNIRP Guidelines. Our website provides information on recent testing and measurements of EMF levels that we have taken near mobile sites. Our published measurements have consistently shown that EMF levels are well within the internationally agreed levels in the ICNIRP Guidelines. We also provide a service where individuals can request Ofcom to carry out EMF measurements near mobile sites. • There have been a significant number of attacks on mobile sites in recent years and publishing information on the location of sites risks further sites being attacked. Such attacks always have an adverse impact such as customers losing mobile signal and mobile operators incurring additional costs but they can have severe consequences, for example, where a mobile site that supports critical communications for the emergency services is attacked; the impact can be particularly serious in the current climate if there is disruption to a hospital's communications systems. Such attacks can also cause physical harm to employees of mobile operators, emergency services personnel and the general public.

Reasons why public interest favours withholding information:

- The greater likelihood of the adverse effect, the greater the public interest in maintaining the exception. This is affected by how extensive the adverse effect is – in this case the adverse effect on national security has the potential to affect the security of the United Kingdom and its people, and the opportunity for the adverse effect to arise is ongoing.
- The impact of the adverse effect on national security also has the potential to harm the United Kingdom and its people and is therefore severe.
- The open-source information that provides similar data may present inaccurate, partial or out-of-date data, which makes them of much more limited use to a potential attacker. Using these open-source information websites would not yield the same level of accuracy as would be contained in the information requested.
- Much of the other publicly available data does not disclose specific site locations or has not been updated for several years and is similarly likely to be inaccurate and incomplete.
- The security risk is also materially higher when all of the requested information is aggregated into a single user-friendly dataset, and published.

- We have carefully considered whether the arguments around transparency and accountability may outweigh the arguments in favour of withholding the information. In doing so, we have taken into account the national security risks identified above as well as (i) the fact all of our EMF measurements to date have shown that EMF levels are well within the internationally agreed levels in the ICNIRP Guidelines; and (ii) the high risk of attacks on mobile sites which can have significant adverse consequences.
- On balance, the arguments against disclosure – including the likelihood and severity of the adverse effect on national security, and the increased threat to national security in respect of the requested information when compared to the information already in the public domain - carry greater weight than the arguments in favour of disclosure. Therefore, the public interest in maintaining the exception outweighs the public interest in disclosure.
- We also note that on 24 September 2024 the Information Commissioner's Office upheld Ofcom's decision to withhold the disclosure of mast locations on the grounds of national security in the context of an appeal of Ofcom's application of the national security exception.

Regulation 12(5)(a) exception

I have delegated authority from the Ofcom Board to make decisions in relation to Ofcom's obligations under the Environmental Information Regulations 2004 (EIR).

Taking into account the advice from Government on the potential implications of disclosure, in my reasonable opinion, disclosure of the information requested would adversely affect national security. Regulation 12(5)(a) of the EIR therefore applies.

In applying this exception, I have balanced the public interest in withholding the information against the public interest in disclosing the information. I have set out above the factors I considered when deciding where the public interest lies.

I have decided that in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information. In assessing this, I have applied a presumption in favour of disclosure.

Disclosure of the information requested is therefore refused under regulation 12(5)(a) of the EIR.

Signed:

David Willis

Group Director, Spectrum

Date: 3 November 2026

Annex B

Regulation 12(4)(b) of the Environmental Information Regulations 2004

The exception

Regulation 12(4)(b) of the Environmental Information Regulations 2004 – a public authority may refuse to disclose information to the extent that– (b) the request for information is manifestly unreasonable.

The regulation is engaged because disclosure of this information is likely to cause a disproportionate cost or burden.

The public interest test

Regulation 12(4)(b) is subject to the public interest test.

Key points:

Ofcom can refuse to disclose information under this exception only if in all the circumstances of the case the public interest in maintaining the exception outweighs the public interest in disclosing the information. In assessing this, under regulation 12(2), Ofcom must also apply a presumption in favour of disclosure.

In carrying out the public interest test, Ofcom should consider the arguments in favour of disclosing the information and those in favour of maintaining the exception, attaching the relative weight to each argument (for and against disclosure) to decide where the balance of public interest lies.

We have set out the matters Ofcom have considered in reaching its decision with respect to the public interest below.

Factors for disclosure	Factors for withholding
• **Transparency:** There is always a general public interest in transparency. The EIR implements EU Directive 2003/4/EC on public access to environmental information. Recital 1 of the preamble to the Directive states this public interest: "Increased public access to environmental information and the dissemination of such information contribute to a greater awareness of environmental matters, a free exchange of views, more effective participation by the public in environmental decision-making and, eventually, to a better environment."	• **Manifestly unreasonable request**: Ofcom does not hold the requested data as an existing file, and would need to undertake significant manual data **s**earches and processing to identify the requested information. Due to the broad nature of the request asking for 'policy developments currently being considered' with no further context of what documents are of particular interest this creates an insurmountable obstacle for Ofcom as it will require every single Ofcom staff member working within the telecommunications sector to search for documents which they think are in scope - this will divert our valuable resources for a significant number of days to complete this request.

• Accountability: As part of the Shared Rural Network programme, the MNOs have given certain coverage commitments which have been written into their spectrum licences in the form of coverage obligations (the "2020 Coverage Obligations"). Some individuals may want to know what locations might remain without coverage after the MNOs have delivered their plans, and by inference what other locations the MNOs are likely to bring into their coverage footprint as a result of extending their mobile coverage to comply with the 2020 coverage obligations.	• **Potentially misleading information:** The data requested would mainly capture casual ideas and thoughts of Ofcom staff, and a lot of those would be in the form of emails and messages which are not drafted for public use and have not undergone scrutiny and senior sign off. Consequently, releasing the data may create the (false) impression that everything contained in those documents are areas of which Ofcom's outlook on work would be in the future, creating confusion and can be interpreted wrongly due to the way the conversations are drafted.

Reasons why public interest favours withholding information:

- We consider that the public interest in withholding disclosure of this information outweighs the public interest in disclosing it. As a request for policy developments currently in consideration is too broad in nature and would create an excessive burden on Ofcom. In addition, a lot of those documents are not public facing and have not undergone senior review and could potentially be misleading if disclosed.

- We have considered whether the request could be reframed in a more manageable way, for instance by focussing only on a particular policy area. However, the term policy development currently in consideration is too wide and so it would not make a difference to burden and resources required to complete the request.

Regulation 12(4)(b) exception

I have delegated authority from the Ofcom Board to make decisions in relation to Ofcom's obligations under the Environmental Information Regulations 2004 (EIR).

For the reasons set out above, in my opinion, the request is manifestly unreasonable because the disclosure of the information requested is likely to cause a disproportionate cost or burden. Regulation 12(4)(b) of the EIR therefore applies.

In applying this exception, I have balanced the public interest in withholding the information against the public interest in disclosing the information. I have set out above the factors I considered when deciding where the public interest lies.

I have decided that in all the circumstances of the case, the public interest in maintaining the exception outweighs the public interest in disclosing the information. In assessing this, I have applied a presumption in favour of disclosure.

Disclosure of the information requested is therefore refused under regulation 12(4)(b) of the EIR.

Signed:

David Willis

Group Director, Spectrum

Date: 3 November 2026