

Mobile connectivity you can count on

Response on behalf of MBNL

July 2026

1. Introduction

1. MBNL manages the mobile infrastructure to enable digital Britain, with an estate exceeding 25,000 sites. Established in 2007 as the industry's pioneer network-sharing joint venture, MBNL has been instrumental in consolidating and managing the UK's largest mobile network infrastructure. Over its 17-year journey, MBNL has garnered numerous awards for network performance and saved billions for its shareholders. By adeptly overseeing the nation's mobile infrastructure, MBNL ensures reliable network coverage, provides substantial cost savings, and facilitates seamless access to digital tools, and information contributing to the connected and efficient lifestyle of millions.
 2. We welcome the opportunity to respond to Ofcom's discussion paper. Our response is limited to *Section 4: Improving Mobile Performance in Town and City Centres*, which addresses an issue of critical importance to mobile network operators, infrastructure providers, members of the public and businesses.
 3. We wholeheartedly support Ofcom's recognition that future mobile policy must focus not only on coverage, but also on the quality, capacity and resilience of networks in the places where people live, work, travel and spend time. Our response focuses on the practical barriers that affect the industry's ability to maintain and improve network performance in high-demand urban areas.
 4. Drawing on MBNL's operational experience and industry evidence, we highlight the impact that planning constraints, inconsistent local authority decision-making, redevelopment-driven site loss, notices to quit (NTQs) and delays in securing replacement infrastructure have on network performance, capacity and resilience. These issues have direct and significant consequences for consumers and businesses by slowing network upgrades, degrading service and causing lost coverage.
 5. We also identify areas where Ofcom should play an important role in supporting better connectivity, including improving the evidence linking mobile performance to infrastructure constraints, supporting planning reform, highlighting the impacts of site loss and replacement delays and strengthening recognition of digital infrastructure as essential national infrastructure.
 6. In summary, improving mobile performance in busy areas will require a planning and regulatory environment that enables mobile infrastructure to be retained, replaced, upgraded and densified quickly and consistently. The issues addressed in this response are therefore fundamental to delivering the reliable, high-quality connectivity that consumers and businesses increasingly depend upon.
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2. Response to Section 4

2.1. Question 4.1: What do you think are the biggest barriers to achieving better mobile performance in town and city centres and why?

7. We strongly support Ofcom's assessment that improving mobile performance in busy areas requires a sharper focus on network quality, capacity and densification, rather than geographic coverage alone. Consumers increasingly depend on reliable mobile connectivity in the places where they live, work, travel and spend time; it is no longer a convenience, but an essential condition for economic participation, access to services and everyday life. In busy urban environments, poor customer experience can arise even where a mobile signal is technically available because the issue is often insufficient capacity or site density, not the absence of coverage.
8. We also welcome Ofcom's recognition that local authorities occupy a critical role in enabling better mobile performance. They influence the deployment environment through planning decisions, access to public assets, street furniture strategies and regeneration schemes. Meaningful improvement will therefore require coordinated action by industry, Government, local authorities, landlords, developers and infrastructure providers.
9. As an infrastructure provider, the biggest challenge we face is the ability to acquire, retain, upgrade and replace mobile infrastructure quickly enough to meet rising demand and respond to the loss of existing sites. Specific constraints include:
 - a. difficulty securing new and replacement sites, particularly in urban, constrained and high-demand locations;
 - b. loss of existing sites through NTQs and redevelopment, creating degraded coverage and reduced capacity;
 - c. the challenge of maintaining network coverage while permanent replacement sites are acquired, consented and integrated;
 - d. planning refusal risk and inconsistent local authority performance;
 - e. appeal delay, which can add months to deployment programmes even where a refusal is ultimately overturned; and
 - f. insufficient recognition of digital infrastructure as an essential utility, resulting in visual and amenity concerns being given disproportionate weight relative to connectivity, resilience and public-value benefits.
10. The evidence shows that this is not a theoretical concern. *Consultation: Reforming planning rules to accelerate deployment of digital infrastructure*¹ ("Mobile UK Submission") put beyond doubt that the current planning framework frequently inhibits timely rollout. Current projections indicate that approximately 16,000 sites, representing around 30% of the cumulative UK network, will require formal planning engagement in the short to medium term. Without reform, a majority of 56% would be expected to follow the full planning process, with 44% falling under prior approval.

¹ Mobile UK and the Mobile Infrastructure Forum, 2026, to which MBNL contributed

11. Those constraints are especially significant in dense urban environments. Many town and city centres contain extensive heritage designations, conservation areas, high-rise development, constrained rooftops and limited alternative siting opportunities. Restrictions on antenna numbers, rooftop support structures, mast width, mast height and replacement locations can materially affect 4G, 5G and 5G Standalone deployment. Rooftop sites face the highest level of regulatory oversight: [REDACTED]
[REDACTED]
12. A further and increasingly important barrier is the loss of existing infrastructure through redevelopment and NTQs. In busy areas, existing rooftop and building-mounted infrastructure is frequently displaced, particularly because of redevelopment and building refurbishment. Once an NTQ has been received, the operator or infrastructure provider must identify a technically viable replacement, secure landowner consent, complete design and survey work, obtain planning permission or prior approval, complete legal documentation, build the site and activate the relevant technology. Each stage is more difficult in constrained urban locations.
13. MBNL's experience illustrates the scale of this challenge. As of 20 April 2026, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
14. Delayed replacement has direct consequences for the public and businesses. Where a replacement site is needed to maintain existing coverage or capacity, delay can lead to degraded service, reduced resilience or increased congestion before replacement infrastructure is delivered.
15. This is an industry-wide issue. The *Mobile UK Submission* set out that between 2023 and 2025 the average period from the service of an NTQ to the deployment of a new site was 2,736 days across the UK and 3,551 days in London. For comparison, the average notice period is 548 days. Further, the paper demonstrated that, during the same reference period, 1,181 sites were off air across the UK, 1,112 of which were in London, due to the gap between losing a site and acquiring and deploying a replacement. None of these figures are acceptable, but the extent to which the problem is more acute in London than the UK average is particularly concerning.
16. While several factors contribute to this reality, the planning system is a material constraint on securing replacement sites before existing sites are lost.
17. MBNL's analysis of 15,000 planning application records in England from 2020 to 2025, of which 5,000 were refused, shows that refusal risk is not evenly distributed. MBNL has seen significant variation between local authorities, including refusal *rates* of 96.5% in Richmond, 90% in Greenwich, 88% in Bristol, 87% in Barnet and 84% in Bromley. In terms of refusal *volumes*, Birmingham recorded 356 refusals and a 34% refusal rate, followed by Sheffield with 159 refusals, Leeds with 126, Liverpool with 125, Barnet with 107 and Bristol with 103.
18. This evidence goes to the core of Ofcom's discussion paper. Where a replacement site is needed to prevent loss of coverage or capacity, refusal does not simply delay a future enhancement. It can prevent timely replacement of an existing operational site and expose the public and businesses to degraded coverage, reduced resilience and increased congestion.
19. Maintaining network coverage during the site replacement process is complex. Current legislation permits temporary sites as permitted development for up to 18 months. In many cases, that period is not long enough to acquire a replacement site, secure planning consent and integrate a permanent installation. Extending the

permitted period to 36 months would help preserve existing coverage while a permanent replacement is secured, rather than allowing overall connectivity to deteriorate.

20. Planning appeals compound the problem. MBNL has seen average appeal success rates of approximately 29% for written representations, 64% overall and median decision times of 20 to 27 weeks, equating to an additional five to seven months of deployment delay. Even where an appeal succeeds, that delay can be material in a live replacement or densification programme.
21. Taken together, this evidence confirms Ofcom's view that improving mobile performance in busy areas requires more than continued operator investment. It requires a planning, property and deployment environment that enables infrastructure to be retained, replaced, upgraded and densified at the pace needed to meet consumer and business demand.

2.2. Question 4.2: What do you think should be Ofcom's main priorities for our future work in this area?

22. MBNL supports Ofcom's proposed focus on better reporting, stakeholder engagement and the role of local authorities in improving connectivity in busy areas. Ofcom's future work should make explicit the relationship between planning performance, infrastructure replacement and real-world mobile network performance.
23. Ofcom should provide clear, granular evidence showing where mobile performance falls short of the level consumers and businesses need. That evidence should also identify, where possible, the underlying infrastructure constraints. Where poor performance in a busy area is caused by insufficient site density, loss of an existing site, inability to replace a rooftop site or a challenge caused by the planning process, that relationship should be visible to policymakers and local authorities.
24. A first priority should be to support planning reform and more consistent local authority practice. The planning refusal analysis demonstrates the significant variation between LPAs, with some authorities refusing telecoms applications at rates far above the national average. Ofcom can assist by providing guidance, evidence packs and local connectivity data that help local authorities better understand the consequences of refusal or delay.
25. Second, Ofcom should work with Government and industry to improve the policy treatment of replacement infrastructure. Existing infrastructure should be recognised as a public asset. Where an existing site is displaced by redevelopment or other landlord action, planning policy should give substantial weight to timely replacement, particularly where the site supports a network-significant location. The *Mobile UK Submission* proposes stronger protection for existing infrastructure and a reverse sensitivity principle requiring developers and local planning authorities to consider whether new developments might interfere with or displace existing digital infrastructure. Ofcom should work with Government to support that objective.
26. Third, Ofcom should prioritise evidence on NTQ and site-loss impacts. As noted above, [REDACTED]
[REDACTED]
[REDACTED] These figures demonstrate that infrastructure loss is not simply a property issue; it is a consumer connectivity issue; it affects business; it is directly relevant to the operation of emergency services networks. It goes to the core of the UK's socio-economic prosperity.

27. Fourth, Ofcom should support better digital-ready development. Major urban development should consider mobile connectivity from the outset. Developers should be expected to consult mobile operators and infrastructure providers early, protect existing infrastructure where possible, provide suitable rooftop space or street-level deployment opportunities and avoid creating preventable coverage or capacity gaps through redevelopment.

2.3.Question 4.3: What information would stakeholders, especially local authorities/ planning authorities, find useful for Ofcom to provide further insights on and why?

28. MBNL strongly supports Ofcom's proposal to provide further information and insights for local planning authorities. As above, the most useful information would be evidence that connects mobile performance, infrastructure need and planning outcomes.
29. First, Ofcom should provide infrastructure-risk data, including information about sites lost or at risk of loss through redevelopment, NTQs and lease expiry. This would help local authorities understand when a planning decision concerns not only a future network enhancement, but the maintenance of an existing service relied upon by the public and businesses.
30. Second, Ofcom can support planning reform by evidencing the impact that reform could deliver. Refusal rates vary significantly by site type, geography and local authority. For full planning applications in the dataset, refusal rates were 28% for Greenfield New, 26% for Rooftop New, 25% for Streetworks New and 9% for Upgrade applications. That type of evidence could help identify where reform, guidance or targeted engagement would have the greatest effect.
31. Third, Ofcom should provide evidence on appeals and the impact of delay. Where a refusal leads to an appeal, the planning analysis records median decision times of 20 to 27 weeks for written representations and a 29% appeal success rate. That evidence would help local authorities understand that refusal is not cost-free. It can add many months to deployment even where permission is ultimately allowed.
32. Fourth, Ofcom should provide economic and public-value evidence that local authorities can use in the planning balance. Connectivity supports town-centre vitality, digital payments, public safety, visitor economies, hybrid working, logistics, smart transport, emergency response and business productivity. The *Mobile UK Submission* records the broader economic and social case for recognising digital infrastructure as an essential utility and notes that 5G adoption across key sectors could unlock between £9 billion and £37 billion annually by 2035.

3. Conclusion

33. The ability to maintain and improve mobile performance depends on the industry's ability to retain existing infrastructure, replace sites lost through NTQ by securing planning permission or prior approval for replacement and densification sites in a timely and consistent manner.
34. Replacement programmes can take years. Refusal rates for new telecoms infrastructure are material and refusals or appeals routinely add many months to delivery timelines. These factors cause reduced resilience, degraded customer experience and lost coverage for the public and businesses. Ofcom can play an important role by continuing to shine a light on these issues, improving the evidence available to local authorities and supporting a more enabling framework for the infrastructure needed to deliver reliable mobile connectivity in the places where people need it most.
35. Because of its considerable experience and unparalleled wealth of expertise, MBNL is uniquely placed to engage and support the ongoing discussion raised in this paper and will remain committed to doing so.