

# Removal of BT Payphones in South Gloucestershire

## First Notification of Decision

Notification under section 49(4) of the  
Communications Act 2003

**South Gloucestershire Council**

**Author:** Corporate Research & Consultation Team  
**Date:** 03 October 2019

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## Introduction

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Draft decision by South Gloucestershire Council in response to the proposal by British Telecommunications plc for the removal of public call boxes pursuant to Part 2 of the Schedule to a Direction published by Ofcom on 14 March 2006 ('the Direction').

1. South Gloucestershire Council, in accordance with section 49(4) of the Communications Act 2003 ('the Act'), hereby make the following draft decision in response to a proposal by British Telecommunications for the removal of public call boxes pursuant to Part 2 of the Direction.
2. The draft decision is set out in the Schedule to this Notification
3. The effect of, and South Gloucestershire Council's reasons for making, the draft decision is set out in the Schedule of this Notification
4. South Gloucestershire Council confirm that the draft decision complies with the requirements of sections 45 to 50 of the Act, as appropriate and relevant to the proposal.
5. In making the draft decision, South Gloucestershire Council has considered and acted in accordance with the six community requirements in section 4 of the Act
6. Representation may be made to South Gloucestershire Council about the draft decision by 9am on 30<sup>th</sup> October 2019
7. A copy of this Notification has been sent to the Secretary of State in accordance with section 50(1)(b) of the Act
8. The Schedule to this Notification shall form part of this Notification.

Nigel Riglar  
Director of Environment and Community Services, South Gloucestershire Council

3<sup>rd</sup> October 2019

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## First Notification Purpose, Methodology and Response

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This notification provides an initial decision on BT's proposal to remove 12 payphones from South Gloucestershire. South Gloucestershire council has made this draft decision based on public consultation and research on the local population, and the decision is open to further consultation before a final decision is made.

### Consultation Methodology

The consultation process was supported by a dedicated consultation webpage which hosted all consultation documents and an online survey to complete. As part of the consultation we also welcomed comments made by letter, email, and over the telephone. These contact methods were promoted on consultation literature, and made use of by consultees to raise questions or provide their views. South Gloucestershire Council received a total of 15 emails, 0 letters and 6 survey responses.

Consultation information was sent to Town and Parish Councils, South Gloucestershire councillors and local voluntary and community organisations. All libraries and One-Stop Shops were also notified of the consultation details and asked to cascade the information to any interested parties.

The first stage of this consultation was open from 29<sup>th</sup> August to 30<sup>th</sup> September 2019.

Responses to the consultation were analysed using a thematic coding framework, which developed over the course of the analysis in order to reflect what consultees said. The principles of analysis included the frequency of occurrence as well as the variety of different comments.

All surveys were designed to be submitted anonymously, due to the data collection method, multiple survey responses could be provided by the same individual. However none of the survey responses used the same words to convey a particular viewpoint, and therefore there are no duplications to take into account. Personal information and comments that can identify individuals, have been removed from the comments analysis.

### Research Methodology

Each phone box was mapped using GIS and a 400m buffer created around each. The following was then calculated:

1. Whether a payphone site which BT proposes to keep exists within 400m of the site that is proposed for removal.

2. Number of domestic premises within 400m  
Source: South Gloucestershire Council Local Land and Property Gazetteer (LLPG)
3. Whether the 400m buffer was within or partly within one of South Gloucestershire's six designated Priority Neighbourhoods. The Priority Neighbourhoods are areas with higher concentrations of multiple deprivation as defined by the English Indices of Deprivation (see further info at: <http://www.southglos.gov.uk/council-and-democracy/census/priority-neighbourhood-profiles/> and <http://www.southglos.gov.uk/council-and-democracy/census/english-indices-deprivation-analysis/>)

The payphones were then evaluated against the information British Telecommunications provided on the number of calls made from each site.

In the instance that inability to rely on the mobile network was raised by consultees, this was confirmed utilizing Ofcom's data through the mobile coverage checker facility on their website: <http://maps.ofcom.org.uk/check-coverage/>

## Schedule

The draft decision by South Gloucestershire Council in response to a proposal by British Telecommunications plc for the removal of public call boxes pursuant to Part 2 of the Schedule to a Direction published by Ofcom on 14 March 2006 ('the Direction').

**Table 1. Draft decision on removal and reasons**

Telephone Number	Address	Post Code	Number of calls in last 12 months	Posting Completed Date	Agree/ Adopt/ Object	Comments/Reasons
01179312540	PCO ST. 60092 81578 RODWAY ROAD PATCHWAY BRISTOL	BS34 5PF	168	29/07/2019	<b>Object</b>	Meets criteria 1: number of calls exceeds 125 per annum Meets criteria 2: 1,356 domestic premises within 400m radius criteria Meets criteria 3: no payphone that will be retained within 400m Meets criteria 4: a small part of the buffer zone is within the Patchway Priority Neighbourhood area
01179566665	COLSTON STREET PCO1 NORTH VIEW STAPLE HILL BRISTOL	BS16 5RU	147	29/07/2019	<b>Object</b>	Meets criteria 1: Number of calls exceeds 125 per annum Meets criteria 2: 1047 domestic premises within 400m radius Meets criteria 3: no payphone to be retained within 400m Meets criteria 4: A small part of the buffer zone is within the Staple Hill Priority Neighbourhood area
01179608014	PCO PCO1 HEATH RISE BRISTOL	BS30 8DD	23	29/07/2019	Agree	Does not meet criteria 1. Meets criteria 2: 957 domestic premises within 400m radius. Meets criteria 3: no remaining payphone within 400m. Meets criteria 4: Part of the buffer zone is within the Cadbury Heath Priority Neighbourhood area
01179608035	PCO PCO1 VICTORIA ROAD WARMLEY BRISTOL	BS30 5LA	40	29/07/2019	Agree	

Telephone Number	Address	Post Code	Number of calls in last 12 months	Posting Completed Date	Agree/ Adopt/ Object	Comments/Reasons
011796922 57	PCO PCO1 GLOUCESTER ROAD NORTH FILTON BRISTOL	BS34 7BG	247	29/07/2019	<b>Object</b>	Meets criteria 1: number of calls exceeds 125, and in fact call numbers have risen since 2016 so there appears be an increased need Meets criteria 2: 578 domestic premises within 400m Meets criteria 3: no remaining payphone within 400m Meets criteria 4: within Priority Neighbourhood of Filton
011796978 76	PCO PCO1 CONISTON ROAD PATCHWAY BRISTOL	BS34 5JP	0	29/07/2019	Agree	Does not meet criteria 1 Meets criteria 2: 608 domestic premises within 400m radius Meets criteria 3: no remaining payphone within 400m Meets criteria 4: the majority of the buffer zone is within the Patchway Priority Neighbourhood area
014542602 05	PCO PCO1 SUNDAYSHILL LANE FALFIELD WOTTON- UNDER-EDGE	GL12 8DQ	51	29/07/2019	<b>Object</b>	Due to consultation responses regarding the exceptional circumstances of this location and type of users, SGC is willing to object in this instance – see ‘reasons for objection: consultation-based decision’ for further detail
014544118 81	PCO PCO1 GREENHILL ROAD ALVESTON BRISTOL	BS35 3LT	6	29/07/2019	<b>Adopt</b>	Request from Alveston Parish Council received 17 <sup>th</sup> September
014546124 61	PCO PCO1 FOXFIELD AVENUE BRADLEY STOKE BRISTOL	BS32 0BN	4	29/07/2019	Agree	Meets criteria 2: 1138 domestic premises within 400m radius Meets criteria 3: Another phone box due for removal within 400m leaving no remaining payphones in this radius
014546127 56	O/S OFFICE OF RETAIL DEVELOP PCO1 PEAR TREE ROAD BRADLEY STOKE BRISTOL	BS32 0BQ	56	29/07/2019	Agree	Meets criteria 2: 1273 domestic premises within 400m radius. Objection from Bradley Stoke Town Council on the basis of high retail and employment usage in area as well as domestic need.
014546322 21	PCO PCO1 STATION ROAD PILNING BRISTOL	BS35 4JT	0	29/07/2019	Agree	
014546324 73	1ST LEFT AFTER M/WAY BRIDGE PCO1 REDWICK ROAD PILNING BRISTOL	BS35 4LZ	2	29/07/2019	Agree	



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## Reason for Objection: Council Criteria for Evidence of need for Universal Service

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There are three instances in which South Gloucestershire Council has reason to believe the local area has an existing and continuing need for the payphone service on the existing site, and that the service users would be deprived of access to the Universal Service if the payphone were to be removed.

South Gloucestershire council considers there to be a reasonable need for a payphone if all criteria of the following circumstance apply:

- The payphone is a service which is in current use, and has been used at least 120 times in the last 12 months, which would equate to at least two instances per week on average
- There is a large enough population of local residents within the payphone's catchment area of 400m who may require a payphone service; around 500 domestic premises within 400m of the payphone
- There is no other payphone within a 400m walk from the payphone under consideration
- There is a socio-economic need for a payphone; the telephone box sits within one of South Gloucestershire's 'Priority Neighbourhoods' which have been identified as having higher than average levels of social, economic and housing deprivation. These households are therefore are less likely to have a landline, mobile phone, or have the income to pay for these methods of accessing telecommunications, making them more likely to need access to a payphone.

In the instance that only some of the above criteria apply to a payphone, South Gloucestershire council does not consider there to be sufficient need to object to the removal of the payphone, since residents are more likely to be able to find another method of using telecommunications than if all the criteria had been met.

The payphones which meet all four of South Gloucestershire Council's criteria for reasonable need by the local population, and therefore the council objects to British Telecommunication's proposal for removal, are:

1. COLSTON STREET, NORTH VIEW, STAPLE HILL BRISTOL, BS16 5RU  
(01179566665)
  - 147 calls in last 12 months
  - 1047 domestic premises within 400m
  - Within 400m or in designated Priority Neighbourhood of Staple Hill and Kingswood
  - No remaining payphone within 400m
  
2. PCO ST. 60092 81578 RODWAY ROAD PATCHWAY BRISTOL BS34 5PF  
(01179312540)
  - 168 calls in last 12 months
  - 1,356 domestic premises within 400m
  - Within 400m of or in designated Priority Neighbourhood of Patchway
  - No remaining payphone within 400m
  
3. PCO GLOUCESTER ROAD, NORTH FILTON, BRISTOL, BS34 7BG  
(01179692257)
  - 247 calls in last 12 months
  - 578 domestic premises within 400m
  - Within 400m of or in Priority Neighbourhood of Filton
  - No remaining payphone within 400m

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## Reason for Objection: Public consultation based decision

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In order for South Gloucestershire Council to base its decision on consultation responses as well as research data, the volume and nature of objections needs to be taken into account.

Factors which have been taken into consideration include the type of resident who may require use of the payphone, the nature of their requirement of a payphone, and whether they would have alternatives.

The council received a request from Bradley Stoke Town Council to object the removal of the payphone on Pear Tree Road in Bradley Stoke. However in this particular case the argument that the area has a large amount of people in the vicinity for retail and employment purposes (presumably in addition to those who live in the area), and that these individuals would be impacted by the lack of a payphone is not evidenced by a high volume of calls from the payphone. It also does not seem likely that

#### 4. PCO SUNDAYS HILL LANE FALFIELD WOTTON-UNDER-EDGE, GL12 8DQ (01454260205)

- The consultation received two objections to removal of Sundays Hill payphone; 1 online survey response, and one email from Falfield Parish Council. The Parish Council specifically mentions prisoners being released from HMP Eastwood Prison as a vulnerable group who require access to telecommunications and are less likely to have another way of contacting people.
- The payphone at Sundays Hill has been used 51 times in the last 12 months, which is an increase of 8 calls per annum compared to 2016 and therefore demonstrates a continuing need. Although this number is low, the proximity of the prison is a reason to believe there will continue to be individuals who will have no other access to telecommunications in this location in the future and that there would be a significantly negative impact of them having no access to telecommunications.

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## Estimated Effect of Draft Decision

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2 of the 6 payphones we have approved removal of have not been used in the last 12 months and therefore their removal should have no quantifiable impact on the local community's usage of telecommunications.

Of the 6 payphones for which we approve removal, 5 are used infrequently (between 1 – 124 times in the last year). It is expected that such payphone users would have to find other means to make telephone calls. It is not known what the purpose, nature or context of these calls are, or how many individuals have used this payphone, and therefore the impact cannot be assessed. However a request has been sent to Bradley Stoke Parish Council for more information on the predicted effect of removing the payphone from Pear Tree Road. Additionally none of these payphones are within a priority neighbourhood so the socioeconomic need to use a payphone should be minimal. The only payphone to be removed within a priority neighbourhood and with a substantial population was not used in the last year.

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## Public Response to the Removal of BT Payphones

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Six individuals completed the survey regarding the proposed removal of payphones, with five out of six respondents objecting to at least one payphone being removed.

The payphones which received the most objections (3 each) were Rodway Road in Patchway and Gloucester Road North in Filton.

Reasons for objections are listed in Table 3, with two respondents mentioning reasonable usage of the phones in Patchway, Filton and Bradley Stoke, and one respondent mentioning old age or rural locations being a factor in Falfield, Alveston and Pilning.

No respondents recorded having used any of the payphones personally in the last year.

**Table 2 Q5. "Which of the following payphones do you object to being removed?"**

<b>Payphone location</b>	<b>Number of respondents objecting to removal</b>
Rodway Road, Patchway	3
Colston Street, Staple Hill	2
Heath Rise, Bristol	0
Victoria Road, Warmley	0
Gloucester Road North, Filton	3
Coniston Road, Patchway	0
Sundayshill Lane, Falfield	1
Greenhill Road, Alveston	1
Foxfield Avenue, Bradley Stoke	0
Pear Tree Road, Bradley Stoke	2
Station Road, Pilning	2
Redwick Road, Pilning	1

Base size: 6

**Table 3 Q.6 “Please explain the nature of your objection”:**

Comment
I have no objection to remove all phone boxes in this day and age most people have a mobile phone or knows someone who does, or has a house phone
Usage of at least 147 calls in last 12 months indicates a community need for these phones. The phones I object to are in more rural areas and with older people.
These phone boxes have recorded over 100 calls in the last 12 months so should be kept
Looking statistically, those areas they're still of use to the communities so would be silly to dispose of them. I don't care about the other areas
The phones I object to are in more rural areas and with older people.
Bradley Stoke Town council objects to the removal of the phone box outside the office of retail development in Pear Tree Road, Bradley Stoke, BS32 0BQ as this is a high footfall area and busy retail and office centre and would directly impact on local residents and users of the retail/office area.

Base size: 6

15 emails were received, with a number from Parish Councils confirming that they had already adopted the telephone box in their area

**Table 4: email responses**

Respondent Type	Email contents
Tytherington Parish Council	Thank you but Tytherington Parish Council own the telephone box now and do not want it removed.
Dyrham and Hinton Parish Council	Dyrham and Hinton PC paid for and own their 2 telephone boxes so do not want them removed.
Olveston Parish Council	But the 2 telephone boxes were purchased from BT sometime ago and are owned by OPC in Olveston and Tockington. The are not in use as a payphone and not connected to BT or any provider They are used by the community for other purposes-
Doynton Parish Council	Many thanks however the ONE telephone box was purchased from BT sometime ago and it is not in use as a payphone and not connected to BT or any provider. It is used by the community for other purposes.
Ashton Parish Council	The phone box in Cold Ashton village (SN14 8JT) was adopted by the Parish Council many years ago. The residents of Cold Ashton would be extremely disappointed if this was one of the box's which South Glos' are proposing to remove.
Stoke Gifford Parish Council	Thank you for this email. Please can you confirm if any of the payphone are relocated in the Parish of Stoke Gifford? I have just read in the week, issue 592 about the plans to scrap 12 phone boxes, one of which in Heath Rise.
Local resident	I am delighted at this idea as it is rarely used for making calls, and is more a source for groups of people to hang about and vandalise it. It has previously been used for drug dealing.

Local resident

I am a resident who lives within eye line of the phone box, so this will be welcome.

Referring to the article in The Week In issue 592 I am trying to establish where the telephone box is in Victoria Road Warmley. I can only assume it is the one in Torrance Close/Valley Road which does join Victoria Road but this is in North Common. Can you please confirm the whereabouts for this particular box.

Good Afternoon

Bradley Stoke Town Council

Further to the consultation detailed above, Bradley Stoke Town council **objects** to the removal of the phone box outside the office of retail development in Pear Tree Road, Bradley Stoke, BS32 0BQ as this is a high footfall area and busy retail and office centre and would directly impact on local residents and users of the retail/office area.

However, the Town Council does not object to the removal of the phone box in Foxfield Avenue, Bradley Stoke, BS32 3LT

Email 1:

Further to a Parish Council meeting (16<sup>th</sup> September) I am writing to confirm that the Parish Council resolved to adopt the following box for benefit to the community.

01454 411881  
PCO PCO1 GREENHILL ROAD  
ALVESTON BRISTOL  
BS35 3LT

Alveston Parish Council

I have contacted BT with this same request and await instruction. Thank you.

Email 2:

I contacted South Gloucestershire Council on the 17th Sept to let them know of our Parish Councils decision to adopt a kiosk. I am still waiting to hear back from them.

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## Adoption of Kiosks

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One parish council expressed an interest in adopting a kiosk, and this will be sent to British Telecommunications by email in order to confirm acceptance of their request.

**Table 5: Respondents who expressed an interest in adoption of kiosks**

Payphone number	Payphone Address	Respondent expressing intention to adopt kiosk
01454 411881	PCO PCO1 GREENHILL ROAD ALVESTON BRISTOL BS35 3LT	Bradley Stoke Town Council

Two survey respondents said they would be either very or quite likely to adopt their local kiosk. These respondents had objected to the removal of payphones at Falfield, Alveston, Pilning, Bradley Stoke and Gloucester Road North.

**Table 6 Q.7 How likely is it that you will adopt the phone box you are answering this survey about?**

	Number of Responses
Very likely	1
Quite likely	1
Unlikely	2
Not at all likely	1
Not Applicable	1

Base size: 23



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## **Second Stage of Consultation: Responses to First Notification of Draft Decision**

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We welcome comments in response to our initial decision, and are open to consultation until midnight 27<sup>th</sup> October 2019. South Gloucestershire Council will consider all feedback and can revise the draft decision. The final decision will be published by 30<sup>th</sup> October 2019.

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## Survey Respondent Demographics

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**Table 7 Q.9 Are you responding as?**

	Number of Respondents
A local resident	4
A local employee	0
A local business/ business owner	0
A South Gloucestershire Council employee	0
A parish or town council	1
A voluntary, community sector organisation	0
Easter Compton Village Hall Committee	1

Base size: 6

**Table 8 Q.13 Your Age:**

	Number of Respondents
18 or under	0
19 - 24	1
25 - 44	0
45 - 64	0
65 - 74	1
Over 75	0
Prefer not to say	2
No answer	2

Base size: 6

**Table 9 Q14. Your gender:**

	Number of Respondents
Female	1
Male	2
Prefer not to say	1
No answer	6

Base size: 6

**Table 10 Q19. Do you consider yourself to be disabled?**

	Number of Respondents
Yes	0
No	3
Prefer not to say	1
No answer	2

Base size: 6

**Table 11 Q13.Your ethnicity:**

	<b>Number of Respondents</b>
Arab	-
Asian/Asian British – Bangladeshi	-
Asian/Asian British – Indian	-
Asian/Asian British – Pakistani	-
Asian/Asian British – Chinese	-
Asian/Asian British – Other (please state)	-
Black/African/Caribbean/Black British – African	-
Black/African/Caribbean/Black British – Caribbean	-
Black/African/Caribbean/Black British – Other (please state)	-
Gypsy or Traveller of Irish Heritage	-
Mixed/Multiple Ethnic Groups – White & Asian	-
Mixed/Multiple Ethnic Groups – White & Black African	-
Mixed/Multiple Ethnic Groups – White & Black Caribbean	<b>1</b>
Mixed/Multiple Ethnic Groups – Other (please state)	-
White – English/Welsh/Scottish/Northern Irish/British	<b>2</b>
White – Irish	-
White – Other (please state)	-
Other ethnic group (please state)	-
Prefer not to say	<b>1</b>

*Base size: 4*