

# 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:** September 2020

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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 20<sup>th</sup> September 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

8th September 2020

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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 5 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. As part of the consultation we 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 2 emails in response to the consultation.

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 21<sup>st</sup> July to 31<sup>st</sup> August 2020.

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.

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	Average calls per month in 6 months until March 2020	Extrapolated calls per year	Agree/ Adopt/ Object	Comments/Reasons
01454 260205	PCO PCO1 SUNDAYSHILL LANE FALFIELD WOTTON- UNDER-EDGE	GL12 8DQ	1	12	<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: please see 'Reason for Objection' section for detail
01179 566665	COLSTON STREET PCO1 NORTH VIEW STAPLE HILL BRISTOL	BS16 5RU	7	84	Agree	Meets criteria 2: no payphone within 400m Meets criteria 3: 1047 domestic premises within 400m radius Meets criteria 4: A small part of the buffer zone is within the Staple Hill Priority Neighbourhood area
01179 692533	PCO PCO1 KINGSWAY LITTLE STOKE BRISTOL	BS34 6LL	32	384	Agree	Meets criteria 1: 384 calls in 12 months Meets criteria 3: 931 domestic premises within 400m radius
01179 312540	PCO ST. 60092 81578 RODWAY ROAD PATCHWAY BRISTOL	BS34 5PF	18	216	<b>Object</b>	Meets criteria 1: 216 calls in 12 months Meets criteria 2: no remaining payphone within 400m Meets criteria 3: 1,356 domestic premises within 400m radius Meets criteria 4: A small part of the buffer zone is within the Patchway Priority Neighbourhood area
01454 612756	O/S OFFICE OF RETAIL DEVELOP PCO1 PEAR TREE ROAD BRADLEY STOKE BRISTOL	BS32 0BQ	5	60	<b>Object</b>	Meets criteria 3: 1,273 domestic premises within 400m radius Due to consultation responses regarding the exceptional circumstances of this location and type of users, SGC is willing to object in this instance: please see 'Reason for Objection' section for detail

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

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In one instance, 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 circumstances 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 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.

However in two cases, extenuating reasons were presented by consultation respondents, leading the council to decide to object in these instances.

The payphone which meets 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. PCO ST. 60092 81578 RODWAY ROAD, PATCHWAY, BRISTOL  
(01179312540)
  - 168 calls in last 12 months (extrapolated from 6 months of data)
  - 1,356 domestic premises within 400m
  - Within 400m or in designated Priority Neighbourhood of Patchwya
  - No remaining payphone within 400m

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## Reason for Objection: Public consultation based decision

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Additionally, 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.

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

The council previously received a request from Falfield Parish Council to object to the removal of the payphone on Sundays Hill Lane in Falfield. The Parish Council particularly mentions prisoners being released from HMP Eastwood Park prison as a vulnerable group who require access to telecommunications, and are less likely to have another way of contacting people.

The payphone has been used 12 times (extrapolated from 6 months of data), but although this is low usage, 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.

2. O/S OFFICE OF RETAIL DEVELOP PCO1 PEAR TREE ROAD, BRADLEY  
STOKE, BRISTOL (01454612756)

The council received a request from Bradley Stoke Town Council to object the removal of the payphone on Pear Tree Road in Bradley Stoke, which BT have previously responded to.

The Town Council has clarified their objection: *Objection from Bradley Stoke Town Council on the basis of high retail and employment usage in area as well as domestic need. For clarification, domestic need refers to a situation where individuals need to access a telephone for social reasons (i.e. domestic violence) and need to use a phone to reach out without other people knowing. Councillors feel that the safety of the town's residents would be diminished/compromised by the loss of this phone box.*

In a previous response, South Gloucestershire Council stated that due to the potential harm to domestic violence victims if the payphone was removed, then the payphone should remain as long as usage remained above an average of 1 call a week (52 calls per year).

Call volumes are currently at 60 calls per year (extrapolated from the 6 months data), and therefore exceed the 52 per year limit previously discussed. The council is therefore objecting to removal of the phone box on that basis.

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## Estimated Effect of Draft Decision

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Of the 2 payphones for which we approve removal, 1 is used infrequently (about 84 times in the last year), and 1 is used frequently (about 384 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.

Neither these payphones are within a priority neighbourhood so the socioeconomic need to use a payphone should be minimal.

## Public Response to the Removal of BT Payphones

Two emails were received regarding the removals of these payphones; one from a local resident, and one from a Town Council. One contained a question and general comments about the consultation process, and one was related to the removal of a specific phone box.

**Table 2: email responses**

Respondent Type	Email contents
Resident	<p>Please can you ask them to prove how many calls were normal calls and how many were 999 calls since if they are 999 calls then I would say they are required irrespective of the number of calls.</p> <p>Also online consultations don't tend to capture everyone in the area concerned so think you need to change your thinking and sent letters to everyone in the areas concerned. Seems you are trying to exclude some people who probably need the phone still but don't sign up to online consultations!</p>
Bradley Stoke Town Council	<p>Bradley Stoke Town Council Planning &amp; Environment Committee wish to object to the removal of the telephone box (01454 612756) O/S Office of retail development PC01 Pear Tree Road, Bradley Stoke, South Glos, BS32 0BQ as the reason to retain the telephone box is the same as when the town council were last consulted, namely:</p> <p><i>Objection from Bradley Stoke Town Council on the basis of high retail and employment usage in area as well as domestic need. For clarification, domestic need refers to a situation where individuals need to access a telephone for social reasons (i.e. domestic violence) and need to use a phone to reach out without other people knowing. Councillors feel that the safety of the town's residents would be diminished/compromised by the loss of this phone box.</i></p> <p>Also, we seek further clarification of the statistics included in this year's consultation as the "average calls per month in last Consultation" column is actually the average calls for a whole year in last year's consultation, not per month. This calls into question the entire consultation as it is based on floored data.</p>

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## **Adoption of Kiosks**

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There were no requests to adopt any of the kiosks.

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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 20<sup>th</sup> September 2020. South Gloucestershire Council will consider all feedback and can revise the draft decision. The final decision will be published by 28<sup>th</sup> September 2020.