

Agenda Item	12
Report No	EDI/74/19

HIGHLAND COUNCIL

Committee: Environment, Development and Infrastructure

Date: 7 November 2019

Report Title: Response to BT consultation on Removal of Payphones

Report By: Acting Head of Policy

1. Purpose/Executive Summary

1.1 This report summarises the Council's response to BT's proposal to remove 110 of the 508 public payphones from across the Highland area. Under Ofcom guidelines, the Local Authority is responsible for co-ordinating a consultation and responding on behalf of the Highland community. The Council's draft response is appended to the report and is based upon representations received during the two phases of public consultation, the second phase closing on 24 October 2019. Based upon consultation feedback, the response proposes objecting to 55 payphones being removed and a further 6 being 'adopted' by the local community.

2. Recommendation

2.1 Members are asked to consider and agree the Council's response to BT's proposed removal of public payphones set out at **appendix 1**.

3. Implications

3.1 **Resource:** There are no financial implications as a result of this report.

3.2 **Legal:** It is the Council's responsibility to co-ordinate the response to BT on behalf of the Highland community, as set out in the Communications Act 2003.

3.3 **Community (Equality, Poverty and Rural):** Many of the payphones identified for removal by BT are in remote and rural areas. Some of the payphones in scope for removal are in areas with high levels of social deprivation, where lower than average levels of mobile phone ownership may reasonably be expected. The appended response to BT includes potential impact on communities in the rationale for objections.

3.4 **Climate Change / Carbon Clever, Risk and Gaelic:** No implications.

4. Payphone consultation process

- 4.1 Under Ofcom guidelines, the Local Authority is responsible for co-ordinating the consultation response on behalf of the Highland community for any proposed removal of payphones. This includes the power of a local veto for the Local Authority. This means that should BT receive an objection from the Local Authority, it must not bring its proposals into effect. However, these objections must be on an individual payphone basis and supported with evidence. A blanket objection to the proposals is not admissible.
- 4.2 In accordance with Ofcom guidelines, a two-phase consultation was carried out. The first phase of consultation ran between 20 August 2019 and 18 September 2019. 136 representations were received including from community councils, community groups, elected Members and private individuals. Responses were analysed, and a first notice and draft response was published on the Council's website. Further views were then sought on the draft response.
- 4.3 A second phase of consultation then ran between 24 September 2019 and 24 October 2019. A further 27 representations were received. Representations received from both phases of consultation have been analysed, collated and summarised. Based upon these, a draft response to BT's consultation is set out in Appendix 1. Where communities have objected to the removal of a payphone, the reasons for the objection have been noted.

5. Response to the consultation

- 5.1 The Council's draft response to the consultation can be found at Appendix 1. Significant concern has been raised about the potential impact of the proposed payphone removals. Section one highlights a number of overarching concerns associated with the proposed removal of payphones in Highland. Section two sets out the position on removal of individual payphones.
- 5.2 Section one of the Council's response highlights a number of key concerns associated with the proposed removal of payphones across Highland. BT has highlighted the basis for proposed removals is a decline in usage of payphones of over 90% in the last decade given that 98% of the UK has either 3G or 4G coverage. BT highlight that it is now possible to "network roam" and call the emergency services, even when there is no credit or coverage from your own mobile provider. Whilst this may be true for many parts of the UK, the level of coverage in Highland is different and the overarching theme of the consultation response is concern over poor mobile phone coverage. Concerns raised over lack of mobile phone coverage in certain areas includes:
- Emergency services calls;
 - Road safety;
 - Mountain and marine safety.

- 5.3 Section one of the response also highlights concerns associated with proposed removal of payphones in areas with high levels of social deprivation. Whilst BT has regard for reasonable social need for retention, its criteria for 'reasonable need' require there to be at least 500 households within one kilometre of the public call box. This criterion fails to recognise low population densities across many Highland communities, especially in rural and remote areas, that may experience social deprivation. This is highlighted in the response.
- 5.4 Section two of the Council's draft response outlines evidence from representations received against each of the payphones proposed for removal. The response proposes to object to the removal of **55** individual payphones, based upon where objections have been received. The majority of objections are on the basis of a lack of reliable mobile phone signal, but others also include: public safety – location near water or hillwalking area; emergency call provision; usage by tourists; and use by residents without access to a mobile phone.
- 5.5 Under BT's Adopt a Payphone scheme, communities can adopt a payphone. Under the Scheme, the payphone itself will be removed but communities can retain the box within the community for alternative use e.g. locating a defibrillator. The response highlights representations have been received by community groups proposing to adopt 6 individual payphones.
- 5.6 There were no objections received for 49 of the payphones proposed for removal. On this basis, and without any supporting evidence, the response does not propose objecting to the removal of these payphones.

6. Next steps

- 6.1 Members are asked to consider and agree the Council's response to BT's proposals. The finalised response must be submitted to BT and the Department for Culture, Media and Sport by the 13th of November 2019, and will be published on the Council's website.
- 6.2 If BT disagree with any of the objections made by the Council, they will ask to formally review those objections with the Local Authority and Ofcom will consider the decision on proposed closure.

Designation: Acting Head of Policy

Date: 25/10/19

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Background Papers:

- Appendix 1: Consultation Response to BT

Response from the Highland Council on BT Payphone Removal Consultation November 2019

The Highland Council welcomes opportunity to respond to BT on the proposed payphone removal across the Highland area. The Council received 163 representations from stakeholders, including from community councils, community groups and individuals. The majority of responses have highlighted concerns about BT's proposals. As a Local Authority covering a geographically large rural and remote area, the Highland Council feels that localised circumstances in Highland deserve special consideration. It is hoped that in addition to the individual objections received, the areas of significance highlighted below will be given consideration in the spirit of the Public Service Obligation.

BT has highlighted that the basis for the current removal is a decline in usage by over 90 percent in the last decade and that the need to provide payphones for use in emergency situations is diminishing as 98 percent of the UK has either 3G or 4G coverage. BT highlights that it is possible to "network roam" to call emergency services, even when there is no credit or coverage from your own mobile provider.

The Highland Council recognise the growth in mobile phone coverage but does not agree that it is appropriate to remove a payphone when reception is only available through one network provider.

- **Access to network roaming:** representations highlighted that network carrier provision in fulfilment of Emergency Services Contracts is limited to the 4G network which, in at least some areas, is not available to customers on Pay as You Go services, nor to users of older mobile devices. As such, desktop-based checks on network availability are not sufficiently reliable to draw conclusions about local network availability in the event of an emergency.
- **Emergency services:** The rural setting of most payphones in scope for removal means there is a considerable delay before a rescuer can reach an emergency caller. If a caller does not have reception on their own network and has used the emergency network roaming facility, rescuers will not be able to call them back to update them on what is happening or to get further information on the situation.
- **Road Safety:** There have been concerns raised about the significant impact of payphone removals upon road safety in the Highlands. The Highland area is large, covering 26,464 sq. km with a road network of over 7,645km. Unclassified roads account for 2,888km. Many roads cover large stretches where there are no settlements. The present removal proposals are likely to leave long stretches of the strategic road network without any payphone provision. This is especially significant given the poor mobile phone coverage as outlined above.

- **Mountain and Marine Safety:** in areas used for outdoor activities e.g. Hill walking or sailing (on inland lochs as well as coastal areas), emergency services may be called out unnecessarily because an individual is unable to inform somebody that they are safely off the hill or the water.

‘Reasonable needs’: The Highland Council does not recognise BT’s requirement for there to be 500 households within 1 kilometre of a payphone to fulfil criteria for reasonable need. This criterion fails to recognise low population densities across many Highland communities, especially in rural and remote areas. This concern is particularly important for areas with higher levels of social deprivation, which may reasonably be associated with lower levels of mobile phone ownership and access to landlines. Lower population density should not be taken to indicate lack of reasonable need for use of a payphone in the event of an emergency.

Schedule

Decision by The Highland 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').

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
1	1309651208	PCO POST OFF GLENFERNESS Nairn	IV12 5UP	2	Adoption	East Nairnshire Community Council has an interest in adoption.
2	1320351213	ADJ CAR PARK PCO GLENMORISTON INVERNESS	IV3 6YA	25	No evidence for objection	
3	1320366379	O/S PUBLIC TOILETS PCO1 CANALSIDE FORT AUGUSTUS	PH32 4AU	58	Object	1 objection received, indicating importance to tourists on the Fort William to Inverness canal route. Removal would exacerbate risks to public safety in the event of an emergency.
4	1349830200	JNCT OF LIVERA ST PCO1 CHAPEL ROAD EVANTON DINGWALL	IV16 9XT	20	No evidence for objection	
5	1349830670	PCO PCO1 FYRISH CRESCENT EVANTON DINGWALL	IV16 9YS	8	No evidence for objection	
6	1349852100	PCO PCO1 FRASER ROAD INVERGORDON	IV18 0NT	41	No evidence for objection	
7	1349861211	PCO PCO1 SEAFORTH PLACE MARYBURGH DINGWALL	IV7 8DR	39	No evidence for objection	
8	1349861351	PCO PCO1 ALCAIG DINGWALL	IV7 8HS	0	Adoption	2 objections received, citing poor local coverage and unreliable landlines locally. Group of 19 local residents also submitted a representation through their elected Member, indicating wish to adopt the kiosk.
9	1349861439	OPPOSITE POST OFFICE PCO1 KNOCKFARREL DINGWALL	IV15 9TQ	0	Object	2 objections received citing sporadic coverage and importance to walkers. Removal would exacerbate risks to public safety in the event of an emergency.

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
10	1349863242	PCO PCO1 MILL STREET DINGWALL	IV15 9PX	72	Object	1 objection received, highlighting regular use and location in an area with low mobile phone ownership which is also situated on a main travel route. Removal would exacerbate deprivation for local residents without access to mobile phones.
11	1349863257	JNCT KINNAIRDIE/TULLOCH AVE PCO1 KINNAIRDIE AVENUE DINGWALL	IV15 9LL	20	No evidence for objection	
12	1349863886	PCO PCO1 BRUCE AVENUE DINGWALL	IV15 9RG	9	No evidence for objection	
13	1349882219	NEAR SMITHY PCO1 ARDROSS ALNESS	IV17 0XW	4	Object	1 objection received from Ardross Community Council, indicating limited coverage which is unavailable to PAYG customers. Within one mile of snow gates at B9176, so important for emergencies. Removal would exacerbate risks to public safety in the event of an emergency.
14	1349882312	O/S 144 MILNAFUA PCO1 MILNAFUA ALNESS	IV17 0YT	58	Object	2 objections received, including from Alness Community Council, indicating poor mobile reception, low levels of mobile phone ownership and importance of the public call box to elderly residents. Area is SIMD 1 (most deprived). Objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.
15	1349882387	O/S 20 NOVAR RD PCO1 NOVAR ROAD ALNESS	IV17 0QQ	51	Object	2 objections received, including from Alness Community Council, indicating poor mobile reception, low levels of mobile phone ownership and importance of the public call box to elderly residents. Area is SIMD 1 (most deprived). Objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
16	1349882562	O/S 190 PCO1 KIRKSIDE ALNESS	IV17 ORH	152	Object	3 objections received, including from Alness Community Council, indicating poor mobile phone coverage and local residents' dependency on use in emergencies. Area is SIMD 1 (most deprived). Objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.
17	1349882671	O/S 95 WESTFORD PCO1 WESTFORD ALNESS	IV17 ORZ	100	Object	3 objections received, including from Alness Community Council, indicating poor mobile phone coverage and local residents' dependency on use in emergencies. Area is SIMD 1 (most deprived). Objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.
18	1397702604	JCN LOCHABER RD PCO1 ZETLAND AVENUE FORT WILLIAM	PH33 6LL	1	No evidence for objection	
19	1397702760	PCO PCO1 GLEN NEVIS PLACE FORT WILLIAM	PH33 6DA	17	No evidence for objection	
20	1397704947	PCO PCO1 TORLUNDY FORT WILLIAM	PH33 6SW	42	No evidence for objection	
21	1397712220	BUS STOP MAIN RD PCO1 SPEAN BRIDGE	PH34 4DX	39	Object	2 objections received, including from Spean Bridge, Roy Bridge and Achnacarry Community Council, indicating sporadic mobile coverage and use by elderly residents, as well as the general importance of a call box in the area for walkers and tourists. Removal would exacerbate risks to public safety in the event of an emergency as well as deprivation for local residents without access to mobile phones.

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
22	1397712740	PCO PCO1 GAIRLOCHY SPEAN BRIDGE	PH34 4EQ	42	Object	3 objections received, including from Spean Bridge, Roy Bridge and Achnacarry Community Council, indicating patchy mobile coverage and proximity to Great Glen Way and Caledonian Canal. Important to emergencies on canal and for walkers. Removal would exacerbate risks to public safety in the event of an emergency.
23	1397722239	O/S GLENFINNAN STN MUSEUM PCO1 GLENFINNAN	PH37 4LT	0	Adoption	1 objection received, in addition to a further response from the Glenfinnan Community Facilities SCIO indicating the payphone has been out of order for a long time; that there is both good mobile coverage and ready access to business and residential land lines. The SCIO wishes to adopt the kiosk.
24	1397732249	PCO PCO1 TULLOCH ROY BRIDGE	PH31 4AR	4	Object	3 objections received, including from Spean Bridge, Roy Bridge and Achnacarry Community Council, indicating sporadic mobile coverage and location near the Eastern Highland Way walking route. Removal would exacerbate risks to public safety in the event of an emergency.
25	1445720200	PCO PCO1 ACHNASHEEN	IV22 2EE	15	Object	5 objections received, including from Garve & District Community Council, highlighting poor or no coverage in an area popular with tourists and hill walkers. This remote area experiences frequent power cuts, resulting in dependence on the payphone in emergencies due to home telephones being inoperable. Removal would exacerbate risks to public safety in the event of an emergency.

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
26	1445731210	PCO POST OFFICE LAIDE ACHNASHEEN	IV22 2NB	1	Object	2 objections received, one citing importance in complementing nearby defibrillator. Remote area with no mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
27	1445760209	PCO PCO1 KINLOCHEWE ACHNASHEEN	IV22 2PA	13	No evidence for objection	
28	1456415200	O/S TELEPHONE EXCHANGE PCO CANNICH BEAULY	IV4 7LN	49	No evidence for objection	
29	1456415275	PCO POST OFFICE TOMICH BEAULY	IV4 7LF	7	Object	20 objections received, including from Tomich Residents' Assoc. No mobile coverage; no alternative within 15 miles, due to hotel being closed and cafe operating limited hours. Payphone is reportedly repeatedly out of service. The Conservation Village is popular with tourists and walkers, who may depend on payphone in emergencies. Removal would exacerbate risks to public safety in the event of an emergency.
30	1456450265	PCO PCO1 LEWISTON INVERNESS	IV63 6UW	8	Object	3 objections received, raising concerns over patchy coverage and proximity to Great Glen Way, which attracts many visitors. Removal would exacerbate risks to public safety in the event of an emergency.
31	1456450283	MILTON VILLA PCO1 GLEN URQUHART INVERNESS	IV63 6TW	0	No evidence for objection	
32	1456450349	PCO PCO1 DRUMNADROCHIT INVERNESS	IV63 6UG	21	No evidence for objection	
33	1456486211	PCO PCO1 GORTHLECK INVERNESS	IV2 6UJ	3	Object	1 objection regarding lack of mobile reception. Removal would exacerbate risks to public safety in the event of an emergency.
34	1456486665	PCO PCO1 ERROGIE INVERNESS	IV2 6UH	2	Object	1 objection received, indicating sporadic mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.

BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
35	1463220191	PCO HILTON COMMUNITY CENTRE OLDTOWN COURT INVERNESS	IV2 4HT	335	Object	1 objection received from an elected Member, highlighting relatively significant usage and location in an SIMD 1 area where residents are less likely to own mobile phones. Objection based on 'reasonable needs'.
36	1463230220	PCO PCO1 SUILVEN WAY INVERNESS	IV3 8PE	84	No evidence for objection	
37	1463230880	PCO PCO1 KINGSMILLS ROAD INVERNESS	IV2 3JT	194	No evidence for objection	
38	1463232076	PCO PCO1 BELLFIELD PARK INVERNESS	IV2 4SZ	59	No evidence for objection	
39	1463232268	PCO PCO1 GLENURQUHART ROAD INVERNESS	IV3 5NX	148	No evidence for objection	
40	1463233438	PCO PCO1 VICTORIA DRIVE INVERNESS	IV2 3QB	64	No evidence for objection	
41	1463234437	PCO PCO1 DORES ROAD INVERNESS	IV2 4QX	30	No evidence for objection	
42	1463234600	O/S HILTON POST OFFICE PCO1 TOMATIN ROAD INVERNESS	IV2 4UA	159	No evidence for objection	
43	1463715119	PCO PCO1 BALLOAN ROAD INVERNESS	IV2 4JG	267	Object	1 objection received from an elected Member highlighting relatively significant usage and location in an SIMD 2 area where residents are less likely to own mobile phones. Objection based on 'reasonable needs'.
44	1463741241	PCO PCO1 KILTARLITY BEAULY	IV4 7HW	3	Adoption	1 objection received, lacking information. Kiltarlity Community Council wishes to pursue adoption.
45	1463761200	PUBLIC CALL OFFICE OUTSIDE POST OFFICE STRUY BEAULY	IV4 7JS	2	No evidence for objection	
46	1463782471	CRASK OF AIGAS PCO1 KILTARLITY BEAULY	IV4 7JP	0	No evidence for objection	
47	1463790200	HEATHERLEA TEA ROOMS PCO1 CULLODEN MOOR INVERNESS	IV2 5ED	7	No evidence for objection	
48	1463791179	PCO PCO1 GALLOWAY DRIVE CULLODEN INVERNESS	IV2 7LR	70	No evidence for objection	

49	1463791473	PCO SMITHTON INVERNESS	IV2 7NL	94	No evidence for objection	
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
50	1463831265	PCO PCO1 ST. MARYS ROAD KIRKHILL INVERNESS	IV5 7NX	8	No evidence for objection	
51	1463831273	PCO PCO1 KIRKHILL INVERNESS	IV5 7PX	6	No evidence for objection	
52	1463870200	PCO PCO1 GREAT NORTH ROAD MUIR OF ORD	IV6 7SU	125	Object	1 objection received, highlighting importance of this particular payphone as both local amenity and for visitors; also highlighting the high total number of calls from this payphone and in total across the three targeted for removal from the village. Removal of all three payphones would fail to recognise demand in the region of 229 calls p/a. The representation received regards this payphone as the easiest for potential users to locate, therefore most suited to retention with removal of others from Muir of Ord. Removal would exacerbate deprivation for local residents without access to mobile phones.
53	1463870221	PCO PCO1 HIGHFIELD CIRCLE MUIR OF ORD	IV6 7TE	20	No evidence for objection	
54	1479841200	PCO PCO1 CARRBRIDGE	PH23 3AA	113	Object	1 objection received from Carrbridge & Vicinity Community Council, highlighting significant usage by locals and large numbers of tourists without access to mobile phones. Removal would exacerbate risks to public safety in the event of an emergency.
55	1479861279	AT GLENMORE LODGE PCO1 AVIEMORE	PH22 1QZ	75	Object	2 objections received, emphasising the payphone is essential for reporting mountain emergencies 'out of hours' when lodge closed. Removal would exacerbate risks to public safety in the event of an emergency.

56	1479872280	PCO POST OFFICE CROMDALE GRANTOWN-ON-SPEY	PH26 3LW	63	Object	2 objections received, indicating patchy mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
57	1479872375	PCO PCO1 HIGH STREET GRANTOWN-ON-SPEY	PH26 3EN	83	Object	1 objection received, highlighting not insignificant usage and importance in complementing nearby defibrillator. Removal would exacerbate risks to public safety in the event of an emergency.
58	1520722243	OPP STRATHCARRON HOTEL PCO STRATHCARRON	IV54 8YR	22	No evidence for objection	
59	1520744254	MIDDLE TOSCAIG PCO1 APPLECROSS STRATHCARRON	IV54 8LY	0	Object	1 objection emphasising importance as the only phone box for many miles, especially to sailors on yachts. Removal would exacerbate risks to public safety in the event of an emergency.
60	1528544220	PCO POST OFFICE LAGGAN NEWTONMORE	PH20 1AH	1	Object	1 objection citing poor mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
61	1540651200	AT UAX SITE PCO1 KINCRAIG KINGUSSIE	PH21 1NA	7	Object	1 objection received indicating importance in the event of emergencies on the Spey river and Loch Insh. Removal would exacerbate risks to public safety in the event of an emergency.
62	1540673860	PCO RALIA VISITORS CENTRE NEWTONMORE	PH20 1BD	25	Object	1 objection, highlighting importance to travellers on the A9 route, which generally lacks alternative public call boxes. Removal would exacerbate risks to public safety in the event of an emergency.
63	1549402185	PCO PCO1 MAIN STREET LAIRG	IV27 4DD	16	No evidence for objection	
64	1549411242	O/S EXCHANGE PCO1 ALTNAHARRA LAIRG	IV27 4UE	9	No evidence for objection	
65	1549441208	OYKEL BRIDGE PCO1 LAIRG	IV27 4HE	0	No evidence for objection	

66	1571833239	NEAR POST OFFICE PCO DRUMBEG LAIRG	IV27 4NW	7	Object	4 objections received. No 4G and only patchy 3G signal available from O2, which is not strong enough for voice calls. Landmark in a very remote area. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
67	1571844714	O/S HARBOUR OFFICE PCO1 CULAG NEW PIER LOCHINVER LAIRG	IV27 4JP	2	Object	3 objections received. Coastal harbour location ('overriding criteria'), important to reporting harbour and fishing accidents and for use by foreign sailors. Removal would exacerbate risks to public safety in the event of an emergency.
68	1593721218	PCO PCO1 MAIN STREET LYBSTER	KW3 6AE	44	No evidence for objection	
69	1599544200	PCO PCO DUIRINISH KYLE	IV40 8BE	0	No evidence for objection	
70	1599544367	NEAR PLOCKTON HIGH SCHOOL PCO PLOCKTON	IV52 8TU	52	No evidence for objection	
71	1599577247	PCO PCO1 ACHMORE STROME FERRY	IV53 8UU	25	Object	1 objection received. Phone an important complement to nearby defibrillator and known to be used by elderly residents. Removal would exacerbate risks to public safety in the event of an emergency as well as deprivation for local residents without access to mobile phones.

72	1599588276	PCO POST OFFICE KILLILAN KYLE	IV40 8EB	52	Object	13 objections received, including from Dornie Community Council which highlighted significant use to reach emergency services. No mobile signal within six miles (potentially 30 mins by car), in an area popular with walkers and cyclists. Area known for mountainside fatalities. Nearby households typically vacant during daytime, so no alternative. Payphone is vital to raising alarm in case of distress on hills or injury of estate workers. Removal would exacerbate risks to public safety in the event of an emergency.
73	1641541221	PCO PCO1 ARMADALE THURSO	KW14 7SA	0	Object	1 objection received, indicating patchy mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
74	1667404200	PCO WEST END HOUSE CAWDOR Nairn	IV12 5XP	4	No evidence for objection	
75	1667404683	PCO PCO1 Nairn	IV12 5QY	0	No evidence for objection	
76	1667452263	PCO PUBLIC CALL OFFICE JOHN STREET Nairn	IV12 5DR	16	No evidence for objection	
77	1667452307	PCO POST OFF HIGH STREET AULDEARN Nairn	IV12 5TH	15	No evidence for objection	
78	1667453036	JCN CAMPERDOWN RD PCO1 HOUSEHILL TERRACE Nairn	IV12 5AS	6	No evidence for objection	
79	1667453039	PCO PUBLIC CALL OFFICE FRASER PARK Nairn	IV12 4RY	10	Object	1 objection received, citing importance to school children and motorists on A82. Removal would exacerbate risks to public safety in the event of an emergency as well as deprivation for local residents without access to mobile phones.
80	1667462232	AT CROSSROADS PCO GOLLANFIELD GOLLANFIELD INVERNESS	IV2 7QP	0	No evidence for objection	

81	1687462273	WAYLEAVE PP350 PCO1 MORAR MALLAIG	PH40 4PE	16	Object	5 objections received, including from Morar Community Council. Only payphone within three miles in a remote rural area with no mobile reception, which has occasionally been cut off by flooding and snow, with large lorries and snowploughs also occasionally going off the road locally. At the junction of popular walking routes around Loch Nevis, the red box is an identifiable landmark and essential for walkers and users of the loch to call emergency services. A large proportion of locals do not own home phones, meaning lesser chance of landline availability, particularly during daytime. Community Council is confident that the recent 16 recorded calls relate to life-saving emergencies. Removal would exacerbate risks to public safety in the event of an emergency.
82	1687470209	RAILWAY STATION PCO1 LOCHAILORT	PH38 4LZ	0	Object	3 objections received. Patchy 3G and 4G coverage. Located at train stop. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
83	1807580250	PCO STEWARTON COTTAGE TOMINTOUL BALLINDALLOCH	AB37 9HR	3	Object	4 objections, including from Cairngorm National Park Authority. No mobile coverage. Located near snow gates at an accident blackspot prone to snow drifts and sudden blizzards, so important in emergencies. Payphone currently out of order. Removal would exacerbate risks to public safety in the event of an emergency.
84	1808521214	DUNMAGLASS PCO1 GORTHLECK INVERNESS	IV2 6YS	0	Object	1 objection received indicating no coverage at iconic, rural location. Removal would exacerbate risks to public safety in the event of an emergency.
85	1809501228	PCO PCO NEAR HOTEL INVERGARRY	PH35 4HG	0	Object	1 objection received from Lochaber area Members of Highland Council, regarding the public call box as a lifeline, due to the high volume of Great Glen Way and canal users, as well as poor mobile phone reception and lack of alternatives should there be any breach of the Canal (such as occurred only two years ago). Removal would exacerbate risks to public safety in the event of an emergency.

86	1809501268	NEAR BRIDGE OF OICH PCO1 INVERGARRY	PH35 4HN	0	Object	1 objection received from Lochaber area Members of Highland Council, regarding the public call box as a lifeline, due to the high volume of Great Glen Way and canal users, as well as poor mobile phone reception and lack of alternatives should there be any breach of the Canal (such as occurred only two years ago). Removal would exacerbate risks to public safety in the event of an emergency.
87	1809511207	PCO TOMDOUN LODGE INVERGARRY	PH35 4HS	0	Object	6 objections received. No mobile coverage locally, nor in the Glen for several miles in a very remote area popular with walkers and tourists. Payphone was out of order between June 2018 and August 2019, contributing to low usage. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
88	1847611228	PCO PCO1 COLDBACKIE LAIRG	IV27 4XP	11	Object	4 objections received, indicating poor mobile reception locally in an area without alternative phones; call box is important in emergencies due to location at a 'tourist shelter' and accident hot-spot on the increasingly busy NC500 route. Removal would exacerbate risks to public safety in the event of an emergency.
89	1847821200	PCO PCO1 MAIN STREET CASTLETOWN THURSO	KW14 8TU	17	No evidence for objection	
90	1847831200	PCO PCO1 CRESCENT STREET HALKIRK	KW12 6XN	10	No evidence for objection	
91	1847851211	PCO POST OFFICE DUNNET THURSO	KW14 8XD	8	Object	1 objection received highlighting poor mobile signal locally. Removal would exacerbate risks to public safety in the event of an emergency.
92	1847892068	PCO PCO1 PROVOST SINCLAIR ROAD THURSO	KW14 7AS	11	No evidence for objection	

93	1854633200	ADJ TO EXCH PCO1 DUNDONNELL GARVE	IV23 2QW	0	Adoption	One representation, from Lochbroom Community Council, supporting removal and adoption
94	1854655218	PCO PCO1 LOCHBROOM GARVE	IV23 2RG	0	Adoption	One representation, from Lochbroom Community Council, supporting removal and adoption
95	1854666200	PCO STRATHKANAI RD LAYBY STRATHKANAI RD ULLAPOOL	IV26 2TP	0	Object	3 objections received, including from Lochbroom Community Council. No mobile coverage. Very remote location on the popular 'North Coast 500' tourist route. Removal would exacerbate risks to public safety in the event of an emergency.
96	1854666244	ULLAPOOL-LOCHINVER ROAD PCO1 ELPHIN LAIRG	IV27 4HH	22	Object	27 objections received, including from Assynt Community Council. No mobile coverage; no nearby commercial premises to provide alternatives. Grampian Speleological Group (caving group) depends on payphone in case of distress. Removal would exacerbate risks to public safety in the event of an emergency.
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97	1855831280	PCO PCO1 LEVEN ROAD KINLOCHLEVEN	PH50 4SJ	38	Object	1 objection received from Kinlochleven Community Council, highlighting occasional use and importance of location by bus route and West Highland Way. Removal would exacerbate risks to public safety in the event of an emergency as well as deprivation for local residents without access to mobile phones.
98	1855851275	PCO POST OFFICE GLENETIVE BALLACHULISH	PH49 4JA	0	No evidence for objection	
99	1862821226	BUS LAYBY ADJ TO EXCHANGE PCO1 EDDERTON TAIN	IV19 1JY	0	No evidence for objection	

100	1862842200	JCT OF OLD MILL ROAD PCO1 DROVERS WAY MILTON INVERGORDON	IV18 0PT	26	Object	2 objections received, including from local elected Member, highlighting intermittent signal and emphasising the importance of the payphone for use by residents making DWP enquiries, job searches and pursuing rent issues, with support from the local community centre. SIMD 2 Area, subject to reasonable need. Defibrillator was recently sited next to the payphone for emergencies.
101	1862863391	PCO PCO ARABELLA TAIN	IV19 1QH	17	Object	3 objections received, including from local elected Member, highlighting intermittent signal, lack of local alternatives and importance to motorists and employees of nearby Nigg yard in emergencies.
102	1862881261	8B KIOSK OUTSIDE POST OFFICE PCO1 SPINNINGDALE ARDGAY	IV24 3AD	2	No evidence for objection	
103	1971511356	BIG BRIDGE LAYBY A838 PCO1 DURNES LAIRG	IV27 4QE	6	Object	1 objection received, indicating importance to tourists on the North Coast 500 route and other remote areas of north west Sutherland, which has generally poor mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
104	1972510218	PCO PCO1 KILCHOAN ACHARACLE	PH36 4LW	0	Object	1 objection received from West Ardnamurchan Community Council, highlighting lack of mobile signal in a beach area which is popular with locals and tourists. The payphone is therefore vital in case of emergencies. However the line remains out of order, despite multiple notifications to BT. Removal would exacerbate risks to public safety in the event of an emergency.

105	1972510223	PCO PCO2 KILCHOAN ACHARACLE	PH36 4LH	3	No evidence for objection	
106	1997414200	PCO PCO1 STIRLING DRIVE GARVE	IV23 2PP	2	Object	2 objections received, including from Garve & District Community Council. Patchy to no coverage in a remote area which is popular with tourists and hill walkers. Removal would exacerbate risks to public safety in the event of an emergency.
107	1997414212	PCO PCO1 ACHANALT GARVE	IV23 2QD	10	Object	2 objections received, including from Garve & District Community Council, indicating poor mobile coverage in an area popular with tourists and hill walkers. Removal would exacerbate risks to public safety in the event of an emergency.
108	1997421394	PCO PCO1 CONTIN STRATHPEFFER	IV14 9ES	15	Object	1 objection received, highlighting patchy coverage and important location at end of bus route. Removal would exacerbate risks to public safety in the event of an emergency as well as deprivation for local residents without access to mobile phones.
109	1997455200	PCO PCO1 GARVE	IV23 2PQ	1	Object	2 objections received, including from Garve & District Community Council, indicating patchy to no coverage in an area popular with tourists and hill walkers. Close to Loch Glascarnoch. Removal would exacerbate risks to public safety in the event of an emergency.
BT Ref No.	Telephone Number	Address	Post Code	No. calls in last 12 months	Agree / Object	Comments/Reasons
110	1997466245	BLACKROCK PCO1 STRATHCONON MUIR OF ORD	IV6 7QG	6	Object	4 objections received, including on behalf of the Community Council. No mobile coverage for many miles in a remote scenic area popular with visitors and for fishing. Community Council emphasises importance in event of emergencies, but also to delivery drivers, drivers of logging trucks, and construction workers. Removal would exacerbate risks to public safety in the event of an emergency.