

<b>Agenda Item</b>	10
<b>Report No</b>	HC/34/20

## HIGHLAND COUNCIL

**Committee:** The Highland Council

**Date:** 29<sup>th</sup> October 2020

**Report Title:** **Response to BT Consultation on Removal of Payphones**

**Report By:** ECO Communities and Place

### 1. Purpose/Executive Summary

- 1.1 This report summarises the Council's response to BT's proposal to remove 107 of the 348 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 two phases of public consultation, the second phase closing on 10 October 2020. Based upon consultation feedback, the response proposes objecting to **65** payphones being removed and a further **3** being 'adopted' by the local community. The response also highlights the Council's extreme disappointment that, not only is such an exercise being carried out during a global pandemic but that it also comes 9 months after the conclusion of the previous consultation and 49% of the payphones in the current consultation were considered for removal in 2019.

### 2. Recommendation

Members are asked to:

- Support and endorse the concerns raised regarding the timing and content of the consultation given the current global pandemic and that this consultation follows only 9 months after the conclusion of the previous one;
- Note that the Leader has written to OfCom seeking redress;
- Consider and agree the Council's response to BT's proposed removal of public payphones as 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 25 August 2020 and 10 September 2020. **247** representations were received, including from community councils, community groups, elected Members of Highland Council, 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 10 September 2020 and 10 October 2020. A further **49** 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, **which for some localities include all BT's public call boxes in the area.** 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 1*

Section one of the Council's response highlights a number of key concerns associated with the basis and premise of the current consultation.

- **Consultation during a Global Pandemic** - BT's current proposals and the requirement for consultation follow only nine months after the conclusion of the

previous consultation on BT payphone removals in 2019. The timing of BT's proposals is extremely disappointing and ill-considered as it has required the Council to consult with community and public sector partners who are largely pre-occupied with community response and resilience work, related to Covid-19. This is an inappropriate use of stretched public sector resource and an added unnecessary concern for communities at a time of national crisis.

- **Duplication of Previous Consultation** – Not only does BT's consultation follow 9 months following the conclusion of the previous consultation in 2019 but it includes within the scope of it, payphones which were previously considered for removal. 52 of the public call boxes within scope of the 2020 consultation were already consulted on in 2019.
- **Disregarding Local Veto** – This includes 46 payphones for which Highland Council exercised its right to a Local Veto on removal in 2019, based on community representations received. BT is therefore seeking to disregard 84% of these recent vetoes on removal. This is in contravention of OfCom requirements that BT must first request a review of such decisions by the Council and OfCom, should it wish to disregard them.

5.3 Section 1 of the response also highlights concerns regarding the apparent disregard for community need and Public Service Obligation arising from its proposal to remove all public call boxes from certain areas of Highland. This includes Alness, a town with higher than average levels of complex social deprivation and the entire Badenoch and Strathspey Ward, a large geographical area which receives significant numbers of hill walkers and tourists, who depend upon access to public call boxes in an emergency. A majority of public call boxes across Skye are also targeted which again is questionable given the remote rural geography of that community.

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; and
- mountain and marine safety.

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 2*

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 **65** 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.

Under BT's Adopt a Payphone scheme, communities can adopt their local kiosk. The payphone itself will be removed, but communities can retain the box for alternative use; e.g. locating a defibrillator. The response highlights representations have been received by community groups proposing to adopt **3** individual payphones.

There were no objections received for **40** 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 29<sup>th</sup> of October 2020 (the day of the Council meeting to which this report relates) and will be published on the Council's website.
- 6.2 If BT disagree with any of the objections made by the Council, they are required by OfCom guidelines to request formal review of those objections with the Local Authority and Ofcom will consider the decision on proposed closure.

Designation: ECO Communities and Place

Date: 11/10/20

Author: Ewen McIntosh, Localism & Engagement Coordinator

Background Papers:

- Appendix 1: Consultation Response to BT

### **Response from the Highland Council on BT Payphone Removal Consultation (August - October 2020)**

The Highland Council is very disappointed that this consultation follows only nine months after conclusion of the previous consultation on BT payphone removals in 2019 and that 52 of the public call boxes within scope of the 2020 consultation were already consulted on in 2019. This is an inappropriate use of limited public sector resource at a time of national crisis, following lockdown. The timing of BT's proposals is disappointing and ill-considered, requiring the Council to consult with community and public sector partners who are largely pre-occupied with community response and resilience work, related to Covid-19 and when communities themselves are focused on responding to the national crisis.

The current round of removals proposed by BT includes 46 for which Highland Council exercised its right to a Local Veto on removal in 2019, based on community representations received. BT is therefore seeking to disregard 84% of these recent vetoes on removal, in apparent contravention of OfCom requirements that BT must first request a review of such decisions by the Council and OfCom, should it wish to disregard them. Consequently, the Leader of Highland Council has written to OfCom seeking guidance on the process required to redress this matter.

Highland Council is similarly concerned by BT's apparent disregard for community need and Public Service Obligation arising from its proposal to remove all public call boxes from certain areas of Highland; including Alness, a town with higher than average levels of complex social deprivation; and the entire Badenoch and Strathspey Ward, a large geographical area which receives significant numbers of hill walkers and tourists, who depend upon access to public call boxes in an emergency. A significant proportion of all PCBs on Skye are also targeted. Many responses levelled the charge that the timing of BT's proposals following Covid lockdown was inappropriate and perhaps disingenuous: average use must reasonably be expected to decline during an extended period of lockdown, particularly for the remote, rural and roadside PCBs included in BT's current proposal.

During the course of the 2020 consultation, Highland Council received 296 representations from stakeholders; including from community councils, community groups and individuals. All but two of these responses highlighted serious concerns about the detrimental impact of BT's proposals on communities.

As a Local Authority covering a geographically large rural and remote area, the Highland Council feels that localised circumstances in Highland deserve special consideration – a one size fits all approach cannot work in the Highlands. It is hoped that in addition to the individual objections received, the areas of significance

highlighted below will be given necessary 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. Many mobile towers in remote rural areas of Highland are also prone to go down during frequent power cuts, during which PCBs are the only means of communicating with the wider world, including emergency services.
- **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 and are an increasingly popular attraction for tourists on driving holidays, with associated increases in road traffic accidents. 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 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, due to lack of mobile signal.

- **‘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. The focus on households also disregards the high numbers of visitors to rural and remote locations during holiday periods.

**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').

Ward Area	BT Ref	Telephone Number	Address	Postcode	Ave. calls p/m	Agree, Adopt, or Object	Reason for objection (based on need for telephony only, not the kiosk)
Aird and Loch Ness	5	01456486238	PCO PCO1 THAIN ROAD WHITEBRIDGE INVERNESS	IV2 6UW	0	No evidence for objection	
Aird and Loch Ness	6	01456486211	PCO PCO1 GORTHLECK INVERNESS	IV2 6UJ	0	Object	1 objection regarding lack of mobile reception. Removal would exacerbate risks to public safety in the event of an emergency.
Aird and Loch Ness	7	01320351213	ADJ CAR PARK PCO GLENMORISTON INVERNESS	IV3 6YA	1	No evidence for objection	
Aird and Loch Ness	8	01456450144	PCO PCO DRUMNADROCHIT INVERNESS	IV63 6TX	3	Object	2 objections received - from a senior Member of Highland Council and Glen Urquhart Community Council: power cuts during extreme weather events have previously disrupted mobile phone towers for extended periods of time, during which the public call box was the only means of communication for many residents. Removal of this call box would leave the closest identifiable alternative call box over 14 miles away. Community is pursuing interest in adoption of the only other PCB in the wider area, at Lewiston, which is located at a distance from passing traffic, such as to make it practically invisible to those who may seek it out in an emergency – as such, town centre box regarded as a better location which must be retained. Retention required for emergency use by locals without mobile phones and by significant volume of tourist traffic in the Loch Ness area.

Aird and Loch Ness	9	01463831265	PCO PCO1 ST. MARYS ROAD KIRKHILL INVERNESS	IV5 7NX	0	No evidence for objection	
Badenoch and Strathspey	57	01479841200	PCO PCO1 CARRBRIDGE	PH23 3AA	13	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.
Badenoch and Strathspey	58	01479810192	PCO PCO1 AVIEMORE	PH22 1QD	3	Object	5 objections received, including from local Members of Highland Council: located in an area with pockets of social deprivation and significant tourism. Heavy snowfall has been known to interrupt mobile signal. Retention required for emergency use by residents without access to mobile phones and to complement use of the nearby defibrillator. No nearby alternative.
Badenoch and Strathspey	59	01479810435	PCO PCO1 MILTON PARK AVIEMORE	PH22 1RR	5	Object	5 objections received, including from local Members of Highland Council: located in an area with an elderly population, pockets of social deprivation and significant tourism – all require use of a public call box for communication in an emergency. Heavy snowfall has been known to interrupt mobile signal. Location complements use of nearby defibrillator. Nearest alternative is many miles away.
Badenoch and Strathspey	60	01479811358	PCO PCO1 GRAMPIAN ROAD AVIEMORE	PH22 1PD	10	Object	5 objections received, including from local Members of Highland Council: located in an area with pockets of social deprivation and significant tourism. Heavy snowfall has been known to interrupt mobile signal. Retention required for emergency use by residents without access to mobile phones and to complement use of nearby defibrillator.

Badenoch and Strathspey	61	01540651200	AT UAX SITE PCO1 KINCRAIG KINGUSSIE	PH21 1NA	9	Object	2 objections received, including KinCraig & Vicinity Community Council: patchy mobile coverage in an area popular with walkers and cyclists; the call box supports use of nearby defibrillator. Removal would exacerbate risks to public safety in the event of an emergency on the Spey river and Loch Insh..
Badenoch and Strathspey	62	01540661085	PCO PCO1 HIGH STREET KINGUSSIE	PH21 1HR	5	Object	1 objection received from Kingussie and Vicinity Community Council highlighting importance of the line in the event an emergency coincide with occasional interruptions which often affect mobile coverage locally.
Badenoch and Strathspey	63	01540673200	PCO NEWTONMORE PO MAIN STREET NEWTONMORE	PH20 1DA	8	Object	1 objection received from Newtonmore & Vicinity Community Council, highlighting an elderly population with low mobile phone ownership and inconsistent mobile coverage locally.
Badenoch and Strathspey	64	01528544220	PCO POST OFFICE LAGGAN NEWTONMORE	PH20 1AH	8	Object	1 objection citing poor mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
Badenoch and Strathspey	65	01540673860	PCO RALIA VISITORS CENTRE NEWTONMORE	PH20 1BD	0	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.
Badenoch and Strathspey	66	01479861279	AT GLENMORE LODGE PCO1 AVIEMORE	PH22 1QZ	6	Object	2 objections received, including from Aviemore and Vicinity Community Council. A central location for a large number of visitors involved in outdoor activities; area with poor mobile reception. Public phone 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. It is a starting point and hub for a wide ranges of outdoor activities, throughout the year. There is a clear need to retain provision to allow access to emergency services.

Badenoch and Strathspey	67	01479861209	PCO THE LOWER SKI LIFT AVIEMORE	PH22 1RB	4	Object	40 objections received, including from Cairngorm Mountain Ranger Service: this is a mountainous area which is very popular with outdoor enthusiasts and visitors, but has inconsistent mobile reception which is severely interrupted by adverse mountain weather conditions. The public phone location is vital for raising emergency services in the event that facilities are closed and mobile phones are inoperable due to signal loss, or loss of battery power. Removal has the potential to delay emergency assistance. This is the highest phone box in this mountainous area, and as the access point for walkers it is a landmark they are highly likely to return to in an emergency to raise help. Cold weather conditions, especially in winter, significantly reduce mobile phone battery life, leaving visitors with unanticipated need for the call box. Mountain Rangers highlight that under deep snow conditions, travel time to the nearest alternative call box may be a full day, making this box essential in case of emergency.
Badenoch and Strathspey	68	01479872375	PCO PCO1 HIGH STREET GRANTOWN-ON-SPEY	PH26 3EN	8	Object	2 objections received, including from Grantown and Vicinity Community Council - highlighting ongoing usage and importance in complementing nearby defibrillator. Mobile signal often 'drops', causing particular problems for the many tourists visiting the area. Removal would exacerbate risks to public safety in the event of an emergency.
Badenoch and Strathspey	69	01479872280	PCO POST OFFICE CROMDALE GRANTOWN-ON-SPEY	PH26 3LW	3	Object	2 objections received, indicating patchy mobile coverage. Removal would exacerbate risks to public safety in the event of an emergency.
Badenoch and Strathspey	70	01807580250	PCO STEWARTON COTTAGE TOMINTOUL BALLINDALLOCH	AB37 9HR	2	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. Removal would exacerbate risks to public safety in the event of an emergency.

Caol and Mallaig	1	01397732249	PCO PCO1 TULLOCH ROY BRIDGE	PH31 4AR	1	Object	8 objections received, including from a Senior Member of Highland Council and former office bearers of Spean Bridge, Roy Bridge and Achnacarry Community Council (not currently formed), indicating sporadic mobile coverage (outage only last week, 6 <sup>th</sup> October 2020, which lasted 2 days) and location at A87 RTA black spot and near the Eastern Highland Way walking route, which is popular among winter climbers (it is a visible landmark from which to raise help). Removal would exacerbate risks to public safety in the event of an emergency. Nearby inn now closed, so no readily accessible alternative phone available in event of emergency in a remote rural area. Also near station and cross-road which is known locally for accidents.
Caol and Mallaig	2	01397712269	PCO PCO1 ROY BRIDGE	PH31 4AH	3	No evidence for objection	
Caol and Mallaig	3	01809501228	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.
Caol and Mallaig	4	01809501268	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.

Caol and Mallaig	75	01397712220	BUS STOP MAIN RD PCO1 SPEAN BRIDGE	PH34 4DX	3	Object	2 objections received, including from former office bearers of Spean Bridge, Roy Bridge and Achnacarry Community Council (not currently formed), 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.
Caol and Mallaig	76	01397712740	PCO PCO1 GAIRLOCHY SPEAN BRIDGE	PH34 4EQ	2	Object	4 objections received, including from Senior Member of Highland Council and former office bearers of Spean Bridge, Roy Bridge and Achnacarry Community Council (not currently formed), indicating patchy mobile coverage and proximity to Great Glen Way walking route and Caledonian Canal. Important to emergencies on canal and for walkers. Removal would exacerbate risks to public safety in the event of an emergency.
Caol and Mallaig	80	01687462273	WAYLEAVE PP350 PCO1 MORAR MALLAIG	PH40 4PE	0	Object	5 objections received, including from Morar Community Council. Line currently out of order, but has previously been used for emergency calls. 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. Removal would exacerbate risks to public safety in the event of an emergency.

Cromarty Firth	16	01349882219	NEAR SMITHY PCO1 ARDROSS ALNESS	IV17 0XW	0	Object	5 objections received from Ardross Community Council and local Members of Highland Council - indicating limited mobile 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.
Cromarty Firth	17	01349882671	O/S 95 WESTFORD PCO1 WESTFORD ALNESS	IV17 0RZ	8	Object	7 objections received, including from Alness Community Council and all local Members of Highland Council, indicating poor mobile phone coverage and local residents' dependency on use in emergencies. Area has high levels of multiple deprivation - objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones
Cromarty Firth	18	01349882562	O/S 190 PCO1 KIRKSIDE ALNESS	IV17 0RH	8	Object	7 objections received, including from Alness Community Council and all local Members of Highland Council, indicating poor mobile phone coverage and local residents' dependency on use in emergencies. Area has high levels of multiple deprivation - objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones
Cromarty Firth	19	01349882387	O/S 20 NOVAR RD PCO1 NOVAR ROAD ALNESS	IV17 0QQ	6	Object	6 objections received, including from Alness Community Council and all local Members of Highland Council: indicating poor mobile reception, low levels of mobile phone ownership and importance of the public call box to elderly residents. Area has high levels of multiple deprivation - objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.

Cromarty Firth	20	01349882312	O/S 144 MILNAFUA PCO1 MILNAFUA ALNESS	IV17 0YT	1	Object	6 objections received, including from Alness Community Council and all local Members of Highland Council, indicating poor mobile reception, low levels of mobile phone ownership and importance of the public call box to elderly residents. Area has high levels of multiple deprivation - objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.
Cromarty Firth	22	01349882779	O/S 51 HIGH ST PCO1 HIGH STREET ALNESS	IV17 0SH	37	Object	4 objections received, including from local Members of Highland Council, indicating local residents' dependency on use in emergencies. Wider area includes localities with high levels of multiple deprivation - objection based on "reasonable needs". Removal would exacerbate deprivation for local residents without access to mobile phones.
Culloden and Ardersier	46	01463790250	OPPOSITE POST OFFICE PCO1 CULLODEN ROAD BALLOCH INVERNESS	IV2 7HQ	14	Object	3 objections received from local Members of Highland Council: located in an area with pockets of social deprivation. Retention required for emergency use by residents without access to mobile phones.
Culloden and Ardersier	47	01463791473	PCO PCO SMITHTON INVERNESS	IV2 7NL	12	Object	3 objections received from local Members of Highland Council: located in an area with pockets of social deprivation. Retention required for emergency use by residents without access to mobile phones.
Dingwall and Seaforth	10	01463870200	PCO PCO1 GREAT NORTH ROAD MUIR OF ORD	IV6 7SU	10	Object	1 objection received, highlighting importance to both visitors and local residents without access to mobile phones.
Dingwall and Seaforth	13	01349861439	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.
Dingwall and Seaforth	14	01349864121	O/S STAFFORD HOUSE PCO1 HIGH STREET DINGWALL	IV15 9SS	18	No evidence for objection	

Dingwall and Seaforth	15	01349863242	PCO PCO1 MILL STREET DINGWALL	IV15 9PX	13	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.
Eilean a' Cheò	81	01471822563	PCO PCO1 DRUMFEARN ISLE OF SKYE	IV43 8QZ	20	No evidence for objection	
Eilean a' Cheò	82	01471822214	PCO PCO1 UPPER BREAKISH ISLE OF SKYE	IV42 8PY	0	No evidence for objection	
Eilean a' Cheò	83	01478640220	PCO PCO GLENBRITTLE ISLE OF SKYE	IV47 8TA	2	Object	4 objections received: due to lack of mobile coverage on any carrier along this glen, retention required to raise emergency services in the event of an accident in the Cuillin Mountains. Recently used by walkers to raise assistance.
Eilean a' Cheò	84	01478640217	PCO PCO1 EYNORT ISLE OF SKYE	IV47 8SG	1	Object	7 objections received, including from Minginish Community Hall Association: box situated in a remote glen on popular walking route, surrounded by wider geographical areas with no mobile reception. Very high proportion of elderly and vulnerable residents with no mobile phone ownership in an area subject to frequent power cuts and interruptions to landline service which have very recently confounded efforts to raise emergency services following a death. The Hall Association highlights the box as vital not only to raise emergency services, but for them to re-establish contact with those in difficulty, due to regular failures of the local mobile network.
Eilean a' Cheò	85	01478640204	OPP TAIGH AILEAN HOTEL PCO1 PORTNALONG ISLE OF SKYE	IV47 8SL	1	Adopt	Minginish Community Hall Association wish to adopt this Kiosk on behalf of the community and repurpose it as a tourist information point, photo and audio gallery of area's history.
Eilean a' Cheò	86	01470572200	OUTSIDE POST OFFICE PCO STRUAN ISLE OF SKYE	IV56 8FB	0	No evidence for objection	

Eilean a' Cheò	87	01470572205	OUTSIDE NO 7 PCO1 ULLINISH ISLE OF SKYE	IV56 8FD	1	Object	1 objection received: patch and intermittent mobile signal in an area popular with cyclists and for watersports and known for agricultural road traffic accidents. Required for emergency use and by elderly residents who do not use mobiles.
Eilean a' Cheò	88	01470572247	NEW P.O. DUNVEGAN ROAD PCO1 STRUAN ISLE OF SKYE	IV56 8FB	0	No evidence for objection	
Eilean a' Cheò	89	01470572228	NEAR SHAGARRY HOUSE BALMEANACH HOUSE BALMEANACH ISLE OF SKYE	IV56 8FH	1	Object	1 objection received: poor mobile reception in an area popular with tourists. Removal would exacerbate risks to public safety in the event of an emergency.
Eilean a' Cheò	90	01470521237	PCO ROAG ISLE OF SKYE	IV55 8ZA	0	Object	3 objections received, including from Dunvegan Community Council. Required for emergency use in an area with patchy mobile reception. Locals have previously used the public call box in emergency situations.
Eilean a' Cheò	91	01470511245	NO.6 KIOSK O/S POST OFFICE PCO1 BORRERAIG ISLE OF SKYE	IV55 8ZY	0	No evidence for objection	
Eilean a' Cheò	92	01470511209	PCO PCO1 LEPHIN ISLE OF SKYE	IV55 8WJ	1	Object	1 objection received. Required for emergency use in an area with patchy mobile reception, where power cuts regularly interrupt mobile signal.
Eilean a' Cheò	93	01470511208	MILOVAIG PCO1 LOWER MILOVAIG GLENDALE ISLE OF SKYE	IV55 8WR	0	No evidence for objection	
Eilean a' Cheò	94	01470592230	OUTSIDE FREE CHURCH PCO1 WATERNISH ISLE OF SKYE	IV55 8GB	0	No evidence for objection	
Eilean a' Cheò	95	01470582246	O/S ARNISORT P.O. (NO.6A) PCO1 KILDONAN EDINBANE PORTREE	IV51 9PU	0	No evidence for objection	
Eilean a' Cheò	96	01470582275	3 CLACHAMISH PCO1 PORTREE	IV51 9NY	1	No evidence for objection	
Eilean a' Cheò	97	01470542218	GLENHINISDALE PCO1 BALMEANACH PORTREE	IV51 9UX	0	No evidence for objection	

Eilean a' Cheò	98	01470542247	OUTSIDE POST OFFICE PCO1 EARLISH PORTREE	IV51 9XL	0	No evidence for objection	
Eilean a' Cheò	99	01470542240	OPPOSITE RIVERDALE PCO1 UIG PORTREE	IV51 9XP	0	No evidence for objection	
Eilean a' Cheò	100	01470542313	UIG PIER PCO UIG PORTREE	IV51 9XX	0	No evidence for objection	
Eilean a' Cheò	101	01470552220	JCN. OF NTH. DUNTULM RD. PCO1 PORTREE	IV51 9UG	0	Object	13 objections received, including from Kilmuir Community Council and N. Duntulm common grazings club: area with sporadic and unreliable mobile reception, where power interruptions disrupt service from both local exchange (landline) and towers (mobile). Box located at the start of a core path coastal route to Rubha Hunish and is the only public payphone for many miles. Has been used in emergency situations in the past. Required to call coastguard and mountain rescue. No alternative, as most nearby residences are unoccupied holiday homes.
Eilean a' Cheò	102	01470562758	PCO PCO1 BROGAIG PORTREE	IV51 9JY	1	No evidence for objection	
Eilean a' Cheò	103	01470562206	PCO PCO1 STAFFIN PORTREE	IV51 9JX	0	No evidence for objection	
Eilean a' Cheò	104	01478612017	WOODEND PCO1 PORTREE	IV51 9LN	0	No evidence for objection	
Eilean a' Cheò	105	01478612292	PCO PCO1 GLENMORE PORTREE	IV51 9LP	0	No evidence for objection	
Eilean a' Cheò	106	01478612479	PCO PCO1 URQUHART PLACE PORTREE	IV51 9HJ	0	No evidence for objection	
Eilean a' Cheò	107	01478612249	PCO POST OFFICE PENIFILER PORTREE	IV51 9NF	22	No evidence for objection	

Fort William and Ardnamurchan	71	01631740275	ADJ TO DUROR TELEPHONE EXCHANGE. PCO1 DUROR APPIN	PA38 4BW	2	No evidence for objection	
Fort William and Ardnamurchan	72	01855811223	PCO PCO1 GLENCOE BALLACHULISH	PH49 4HW	2	No evidence for objection	
Fort William and Ardnamurchan	73	01855831280	PCO PCO1 LEVEN ROAD KINLOCHLEVEN	PH50 4SJ	3	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.
Fort William and Ardnamurchan	74	01397704947	PCO PCO1 TORLUNDY FORT WILLIAM	PH33 6SW	1	No evidence for objection	
Fort William and Ardnamurchan	77	01967402390	PCO PCO1 STRONTIAN ACHARACLE [Upper Scotstoun]	PH36 4JB	0	No evidence for objection	
Fort William and Ardnamurchan	78	01972510218	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.
Fort William and Ardnamurchan	79	01687470209	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.
Inverness Millburn	55	01463236331	PCO PCO1 CUTHBERT ROAD INVERNESS	IV2 3RU	2	No evidence for objection	
Inverness Ness-side	51	01463234437	PCO PCO1 DORES ROAD INVERNESS	IV2 4QX	3	No evidence for objection	

Inverness Ness-side	53	01463220191	PCO HILTON COMMUNITY CENTRE OLDTOWN COURT INVERNESS	IV2 4HT	72	Object	1 objection received from an elected Member, highlighting relatively significant usage and location in an area with higher than average multiple deprivation, where residents are less likely to own mobile phones. Objection based on 'reasonable needs'.
Inverness Ness-side	54	01463715119	PCO PCO1 BALLOAN ROAD INVERNESS	IV2 4JG	12	Object	1 objection received from an elected Member highlighting relatively significant usage and location in an area with higher than average multiple deprivation, where residents are less likely to own mobile phones. Objection based on 'reasonable needs'.
Inverness South	56	01463792918	LAY-BY ON B9006 PCO CULLODEN ROAD WESTHILL INVERNESS	IV2 5BJ	9	No evidence for objection	
Inverness West	50	01463235846	PCO PCO1 GOLF VIEW ROAD INVERNESS	IV3 8SZ	10	Object	1 Objection received from Member of Highland Council: highlighting existing need at c.120 calls p/a in an area with a significant elderly population and lower than average usage of mobile phones Close to Great Glen Way route and used by walkers in the event of mobile network issues.
Nairn and Cawdor	33	01667453218	PCO PCO1 HIGH STREET NAIRN	IV12 4BW	0	No evidence for objection	
Nairn and Cawdor	34	01667453039	PCO PUBLIC CALL OFFICE FRASER PARK NAIRN	IV12 4RY	1	Object	1 objection received, citing importance to school children and motorists on A96. 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.
Nairn and Cawdor	35	01667452141	PCO PCO1 MOSS-SIDE ROAD NAIRN	IV12 5NQ	4	No evidence for objection	
North, West and Central Sutherland	28	1641541221	PCO PCO1 [LEDNAGULIN] ARMADALE THURSO	KW14 7SA	0	Adopt	Local elected Member of Highland Council will work together with Strathy and Armadale Community Council to identify a suitable community group to take forward adoption. This PCB has not been operational for many years and BT engineers have reputedly been unable to repair it.

North, West and Central Sutherland	29	01641521270	OUTSIDE POST OFFICE PCO2 SKERRAY THURSO	KW14 7TH	0	Adopt	Local elected Member of Highland Council will work together with Strathy and Armadale Community Council to identify a suitable community group to take forward adoption.
North, West and Central Sutherland	30	01641521243	NEAR TOLL HOUSE PCO1 SKERRAY THURSO	KW14 7TH	4	No evidence for objection	
North, West and Central Sutherland	31	01847611228	PCO PCO1 COLDBACKIE LAIRG	IV27 4XP	1	Object	4 objections received, including from Tongue Community council, noting no 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 (mountain and road) on this single-track section of the very busy NC500 route. Removal would exacerbate risks to public safety in the event of an emergency.
North, West and Central Sutherland	32	01847601254	PCO PCO1 LUBINVOULIN TALMINE LAIRG	IV27 4YT	0	No evidence for objection	
North, West and Central Sutherland	36	01971511356	BIG BRIDGE LAYBY A838 PCO1 DURNESS LAIRG	IV27 4QE	0	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.
North, West and Central Sutherland	37	01571833239	NEAR POST OFFICE PCO DRUMBEG LAIRG	IV27 4NW	0	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.
North, West and Central Sutherland	38	01571844714	O/S HARBOUR OFFICE PCO1 CULAG NEW PIER LOCHINVER LAIRG	IV27 4JP	0	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.

North, West and Central Sutherland	39	01571822201	PCO PCO1 ELPHIN LAIRG	IV27 4HL	1	Object	5 objections received, including from Assynt Community Council. Line out of order for an extended period. Repair and retention required for emergency use in a wider-area with many mobile 'black spots', in which there are commonly fatal road accidents and breakdowns on rural roads. Large growth in traffic, due to popularity of NC500 touring route. Located at the start of popular walking routes (inc. Conival, Ben More, etc), on which often accidents.
North, West and Central Sutherland	40	01854666244	ULLAPOOL-LOCHINVER ROAD PCO1 ELPHIN LAIRG	IV27 4HH	2	Object	29 objections received, including from Assynt Community Council. No mobile coverage in an area popular with walkers; no nearby commercial premises to provide alternatives. Grampian Speleological Group (caving group) is active in the area and its 150 members depend on this payphone in case of distress. Removal would exacerbate risks to public safety in the event of an emergency.
Tain and Easter Ross	21	01862842200	JCT OF OLD MILL ROAD PCO1 DROVERS WAY MILTON INVERGORDON	IV18 0PT	1	Object	2 objections received, including from local elected Member, highlighting intermittent signal and emphasising that prior to lockdown, this call box has been important for use by residents making DWP enquiries, job searches and pursuing rent issues, with support from the local community centre. Area has higher than average social deprivation - objection subject to reasonable need. Defibrillator was recently sited next to the payphone for emergencies.
Tain and Easter Ross	23	01862863391	PCO PCO ARABELLA TAIN	IV19 1QH	2	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.
Tain and Easter Ross	24	01862892395	PCO ST. ANDREWS RD/GLEBE CRES ST. ANDREWS ROAD TAIN	IV19 1HB	2	No evidence for objection	

Thurso and Northwest Caithness	27	01847851211	PCO POST OFFICE DUNNET THURSO	KW14 8XD	0	Object	1 objection received highlighting poor mobile signal locally. Removal would exacerbate risks to public safety in the event of an emergency.
Wester Ross, Strathpeffer and Lochalsh	11	01997477229	PCO PCO1 STRATHCONON MUIR OF ORD	IV6 7QQ	1	No evidence for objection	
Wester Ross, Strathpeffer and Lochalsh	12	01997421394	PCO PCO1 CONTIN STRATHPEFFER	IV14 9ES	0	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.
Wester Ross, Strathpeffer and Lochalsh	41	01445731210	PCO POST OFFICE LAIDE ACHNASHEEN	IV22 2NB	0	Object	5 objections received, including from Aultbea Community Council: vital to emergency use, due to location near coastal jetty and defibrillator. Remote area on road route to popular tourist destinations such as Mellon Udrigle. No / unreliable mobile coverage (recently towers were down for period of weeks) and common power cuts which impact mobile signal towers. Line recently out of order for an extended period of months/years, requiring recent use of local shop phone to contact ambulance and breakdown services on behalf of tourists - not always possible, depending on whether open. Removal would exacerbate risks to public safety in the event of an emergency. Requires repair.
Wester Ross, Strathpeffer and Lochalsh	42	01997455200	PCO PCO1 GARVE	IV23 2PQ	0	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.
Wester Ross, Strathpeffer and Lochalsh	43	01997414200	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.
Wester Ross, Strathpeffer and Lochalsh	44	01997414212	PCO PCO1 ACHANALT GARVE	IV23 2QD	2	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.
Wester Ross, Strathpeffer and Lochalsh	45	01445720200	PCO PCO1 ACHNASHEEN	IV22 2EE	0	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. Removal would exacerbate risks to public safety in the event of an emergency.
Wester Ross, Strathpeffer and Lochalsh	48	01599588276	PCO POST OFFICE KILLILAN KYLE	IV40 8EB	0	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.
Wester Ross, Strathpeffer and Lochalsh	49	01520744254	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.
Wester Ross, Strathpeffer and Lochalsh	52	01520722243	OPP STRATHCARRON HOTEL PCO STRATHCARRON	IV54 8YR	1	No evidence for objection	

Wick and East Caithness	25	01593731209	PCO PCO1 BRAEMORE DUNBEATH	KW6 6EX	5	Object	31 objections received, including from Berriedale & Dunbeath Community Council and a local Member of Highland Council: remote and isolated location, which is home to a large elderly population and popular with walkers, but has no mobile signal. Line in public call box is currently out of order and local landlines also regularly subject to faults. Box is located on the most popular route for climbers to scale Morven, the highest mountain in Caithness. Agents for local landed estates regard use of the public call boxes as integral to communicating during work across the area, due to lack of mobile signal. Line has historically been used to report road accidents. Community Council note that Fire Service have tested mobile reception in the area, finding it to be lacking. Call box requires repair and retention for emergency use.
Wick and East Caithness	26	01955602712	BIGNOLD PARK PCO1 HARROW HILL WICK	KW1 5BW	0	No evidence for objection	