

EXMOOR NATIONAL PARK AUTHORITY RESPONSE
BT CONSULTATION PROPOSALS CONCERNING TELEPHONE BOXES
SOMERSET WEST AND TAUNTON IN EXMOOR NATIONAL PARK

Introduction

British Telecommunications plc (BT) has written to Somerset West and Taunton Council as part of a formal consultation process about a programme of intended public payphone removals.

BT previously consulted the National Park Authority (NPA) in respect of their wish to remove public telephone boxes from within the National Park area in 2003/4, 2008 (10 boxes), 2009 (13 boxes) and 2016 (16 boxes) and the NPA responded to a consultation by Somerset West and Taunton Council in 2019 (4 boxes).

The removal of 3 public phone boxes, including three below (Bridgetown, Exford and Luckwell Bridge), was the subject of an emergency item to the Exmoor National Park Authority meeting for the previous consultation in 2019. Exmoor National Park Authority members resolved that officers should respond to the consultation by Somerset West and Taunton Council (and directly to BT) to object to the removal of heritage 'K6' phone boxes and also on grounds of inadequate mobile phone signal. This applied to all phone boxes proposed for removal.

This response relates to a consultation through Somerset West and Taunton Council about BT's proposal to remove 9 public phone boxes in the West Somerset area of Exmoor National Park. It restates the points the NPA made in 2019 because it is less than a year since BT proposed removal of these same phone boxes. They are:

	Heritage Value	Mobile Signal
Bridgetown	Yes	Limited
Brompton Regis	Yes	No
Exford	No	Limited
Exton	Yes	Limited
Luccombe	Yes	No

Luckwell Bridge	Yes	No
Porlock (High Street)	Yes	Limited
Simonsbath	Yes	Limited
Withypool	Yes	No

Key Points

Exmoor National Park receives a high number of visitors to the area – approximately 1.36 million tourists in 2015 (2.14 million visitor days)

There is very patchy mobile phone coverage due to the terrain and landscape within the National Park – most notably the steep combs inhibit mobile phone reception. Even if a mast is not far away, a signal cannot always be accessed in the bottom of the valleys.

In terms of local distinctiveness and heritage, 8 of the 9 boxes identified by BT in this consultation which are within the Somerset area of Exmoor National Park are the traditional K6 'Jubilee Kiosks' which were introduced from 1936 to celebrate the Silver Jubilee of King George V. Many of the traditional K6 red public telephone boxes were listed during the 1980s.

Public telephone boxes may be used at any time, whereas premises that offer access to a payphone facility, may have only limited opening hours or access.

There is an extensive rights of way network across Exmoor, with over 1000km of rights of way open to walkers. Walking tends to be the most popular outdoor recreation activity on Exmoor; therefore, it is important, as a general approach, that the public telephone box network within the National Park be maintained for emergency and other important telephone calls.

Detailed Consideration of the Public Phone Boxes Proposed for Removal

Bridgetown:

This traditional box stands in a layby on the A396 and forms part of an attractive element of Bridgetown, within the historic settlement core.

Exton Parish council have objected to the removal of this box and the box in Exton with the following comment:

“the telephone boxes at Exton and Bridgetown need to be retained because of the lack of mobile signal coverage. Both the Parish Council and ENPA objected to their removal some months ago when this consultation was first notified. Is this a second consultation or was the original one put on hold?”

The box was found not to be operational by a National Park Officer in August which will invalidate call records from the phone.

The National Park Authority notes that the public phone box in Bridgetown is a traditional red K6 box. It is recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Bridgetown because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve and enhance its cultural heritage¹. The second reason is that there is very poor mobile phone coverage and the phone box is also close to the camping and caravanning site in Bridgetown. Exmoor National Park Authority **objects** to the removal of the public phone box.

Brompton Regis

This traditional box stands at the south east corner of the church yard and forms part of an attractive element of Bridgetown, within the historic settlement core.

The Clerk for Brompton Regis Parish Council wrote to the National Park Authority. She stated that:

“Brompton Regis telephone kiosk offers an important lifeline in an area where there is no mobile phone reception.

This is particularly important for the large and increasing number of visitors who we see walking/cycling/ driving through the village and parish, many of whom will have no idea that there is no mobile phone reception until they try to use their phones.

The parish usually hosts a number of major sporting events (in the past Ironman, and now a more local triathlon, and the Exmoor Wild Swim during which, again, many visitors congregate and pass through the area.

¹ National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

There are limited local facilities at which people could ask to use a landline: our community shop is open 9-11 Monday to Saturday, our pub and a local cafe have limited and variable opening hours.

We believe the kiosk must be maintained for public safety and security”.

These comments are supported by Councillor, Nick Thwaites who wrote:

“Brompton Regis have a phone box and want to keep it.

The reason being is there is no mobile coverage in the village and this is bourn out by the OFCOM coverage maps”

The National Park Authority notes that the public phone box in Brompton Regis is a traditional red K6 box. It is recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Bridgetown because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve and enhance its cultural heritage². The second reason is that there is very poor mobile phone coverage

Given the heritage value of the box, poor mobile coverage, and the comments of the District Councillor and views of Brompton Regis Parish Council, Exmoor National Park Authority **objects** to the removal of the public phone box.

Exford

This new “black-red” box (rather than a K6 box) is in the village of Exford.

The Clerk for Brompton Regis Parish Council wrote to the National Park Authority. She stated that:

“Exford Parish Council object to the closure, on the grounds that there is very poor coverage by mobile phone in the area. Also noted possible reason for lack of use of the phone box is because it has broken down on occasions and not been repaired quickly”.

² National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

Given the above position of Exford Parish Council, Exmoor National Park Authority wishes to **object** to the removal of the public phone box. There is very poor mobile coverage in this area.

Exton

This traditional box stands at the centre of Exton adjacent to the grade II listed Red Door Farm. It forms part of an attractive element of Exton, within the historic settlement core.

Exton Parish council have objected to the removal of this box and the box in Bridgetown with the following comment:

“the telephone boxes at Exton and Bridgetown need to be retained because of the lack of mobile signal coverage. Both the Parish Council and ENPA objected to their removal some months ago when this consultation was first notified. Is this a second consultation or was the original one put on hold?”

The National Park Authority notes that the public phone box in Bridgetown is a traditional red K6 box. It is recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Bridgetown because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve and enhance its cultural heritage³. The second reason is that there is very poor mobile phone coverage and the phone box is also close to the camping and caravanning site in Bridgetown. Exmoor National Park Authority **objects** to the removal of the public phone box.

Luccombe

This is a traditional box that stands in the centre of the village next to the village green. Luccombe is also a Conservation Area.

The chairman of Luccombe Parish Council responded directly to the Chef Executive of BT, with ENPA and SWT council copied in regarding the removal of the box with the following:

“Dear Mr. Jansen,

³ National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

About a year ago I wrote to you (email attached) to oppose BT's plans to remove the telephone kiosk from our village, Luccombe in Somerset.

Despite assurances that the order to remove the phone box and the telephone service had been rescinded (see attached email) a notice has recently been posted in the phone box saying that the facility is to be removed (See photograph of notice below).

Last year's proposal to remove the kiosk was based on the lie that there is a mobile telephone service in Luccombe – there isn't.

BT wittingly or unwittingly perpetuated the lie using Ofcom data about mobile coverage provided to Ofcom by deceitful mobile phone companies which claim more extensive coverage than they in fact deliver. Mobile phone company maps show a mobile signal in Luccombe. Anyone on any of the networks will show you there is no mobile signal anywhere in the village and especially not in the centre of the village by the telephone box.

Last year the parish council raised its objection with the BT department responsible for removing phone boxes. This department said we needed to object through the "local authority" seemingly unaware that a parish council is a democratically elected local authority. However, we raised the issue with Exmoor National Park, who has sought a listing for the kiosk as it lies in the National Park and a conservation area and is surrounded by other listed buildings in this historic village. We also raised it with Amy Tregellas, Governance Manager and Monitoring Officer, Somerset West and Taunton who failed to acknowledge our response.

We then received an email from Paul McDonald of BT telling us that the decision to remove the telephone kiosk had been rescinded because there is no mobile phone signal in the village. We replied to Mr. McDonald and also wrote to Amy Tregellas, Governance Manager and Monitoring Officer, Somerset West and Taunton seeking confirmation that we could trust the decision not to remove the phone kiosk was permanent. We received no reply.

As I have mentioned, BT have again posted a notice (below) saying they intend to remove the phone box. It can only be assumed BT acted in bad faith when they promised to halt stop the removal last year.

Given that most domestic telephones today are digital, in the event of a power failure Luccombe would be cut off from the telephone system and the emergency services except via the availability of the BT telephone in the red kiosk. There is still no mobile signal in Luccombe. The situation is unchanged. Why then are BT again attempting to remove this vital connection having given the assurance it was safe? What does Luccombe have to do to prevent annual attempts to remove the telephone box?

Please consider this email as an objection, submitted within the 42-day notice period, to the removal of the telephone kiosk and telephone service in Luccombe”.

Luccombe Parish Council have had a considerable amount of correspondence with BT regarding the removal of the box. The box was put forward for removal in 2019 and resisted. The Parish Council have made clear to ENPA that they are strongly opposed to the removal of the phone box.

The National Park Authority notes that the public phone box in Luccombe is a traditional red K6 box. It is recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Luccombe because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve and enhance its cultural heritage⁴. It also contributes to the character and appearance of the conservation area. Local Authorities have a legal duty to ensure that the character and appearance of conservation areas are conserved or enhance under the 1990 Planning (Listed Building and Conservation Areas) Act.⁵

The second reason is that there is very poor mobile phone coverage

Given the heritage value of the box, poor mobile coverage, and the views of Luccombe Parish Council, Exmoor National Park Authority **objects** to the removal of the public phone box.

⁴ National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

⁵ 1990 Planning (Listed Building and Conservation Areas) Act. <https://www.legislation.gov.uk/ukpga/1990/9/contents>

Luckwell Bridge, Wheddon Cross

This phone box is in the small hamlet of Luckwell Bridge, in a layby just off the main road. There is a range of dwellings and adjoining bridleways and footpaths. The Authority previously resisted the removal of this box in 2009, 2016 and 2019.

Cutcombe Parish Council has objected to the proposed removal of this phone box. It said:

“Object – on the basis that the mobile signal of some networks is poor in the area, the phone box is available to both visitors and locals in the instance that they have problem with their landlines. The low number of calls from the call box can be attributed perhaps to the fact that only emergency calls can be made as there is no way to make paid for calls – the instructions in the call box indicate that you should lift the headset and swipe your card through the card reader, but there is no card reader present, therefore no way provided to make chargeable calls, however the ability to make emergency calls is essential. Also the red phone box is something of a landmark in the area.”

As context, the Parish Council also objected to the removal of this payphone in 2019 with the following comment

“Cutcombe Parish Council object to the proposed removal of the telephone box at Luckwell Bridge due to the lack of mobile signal. In addition, in the phone box it states payment for calls can be made using cards and details how to lift the handset and swipe cards through the card reader, yet there is no card reader in the phone box.”

As further context, the Parish Council also objected to the removal of this payphone in 2016 because of a lack of mobile phone reception, its importance for local people, visitors and walkers and that Luckwell Bridge is a recognised accident blackspot with the nearest public payphone a mile away - a steep uphill walk.

The National Park Authority notes that the public phone box in Luckwell Bridge is a traditional Red K6 Box; It is also recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Luckwell Bridge because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve

and enhance their cultural heritage⁵ The second reason is that there is very poor mobile coverage. Exmoor National Park Authority **objects** to the removal of the public phone box.

Porlock High Street

This is a traditional box that stands in the east end of the village on the High Street near to the grade II* listed Doverhay Museum. Porlock is also a Conservation Area and the box contributes to the character of the village. There are 3 phone boxes in Porlock. This is the only box that remains functional. Porlock is one of the largest settlements in the National Park.

At the time of writing Porlock Parish Council had not debated the removal of the box, however the clerk for the Parish Council confirmed that:

“The majority of Councillors would like to retain the phone box as is.”

The National Park Authority notes that the public phone box in Porlock is a traditional red K6 box. It is recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Porlock because of its heritage value as a K6 red phone box. This is consistent with the National Park’s statutory purpose to conserve and enhance its cultural heritage⁶. It also contributes to the character and appearance of the conservation area. Local Authorities have a legal duty to ensure that the character and appearance of conservation areas are conserved or enhanced⁷.

The second reason is that there is very poor mobile phone coverage

Given the heritage value of the box, poor mobile coverage, and the views of Porlock Parish Council, Exmoor National Park Authority **objects** to the removal of the public phone box.

^{5,6} National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

⁷ 1990 Planning (Listed Building and Conservation Areas) Act.
<https://www.legislation.gov.uk/ukpga/1990/9/contents>

Simonsbath

This is a traditional box that stands in the centre of the small settlement of Simonsbath on the main road.

Exmoor Parish Council has provided the following response:

“The Exmoor Parish Council are very concerned over the threat of the removal of the phone box in the village of Simonsbath (which is the village in this parish).

They believe there is still a legitimate reason for keeping the phone in the phone box active because as yet the 4G signal is not reliable enough throughout the village and consequently not all mobile providers give their users a stable signal.

Visitors to the village with, for example, Vodafone struggle to get a consistent signal.

The Parish Council also feel that the 3 month check for the usage of the phone box clashes with COVID19 when the village did not have any visitors. Obviously, if they are basing their figures during this period and also backing on to the autumn/winter months, then there wouldn't have been many people walking through the village, however when the area is full of visitors then the phonebox is needed for those without EE connection.

The local Trust are hoping to get a community centre and a camping barn up and running before too long, so it will be foolish to leave Simonsbath without the means for visitors to be able to contact the outside world (and especially the Emergency Services) in times of need/crisis!

Therefore the BT Phone and Box in Simonsbath must stay”.

The National Park Authority notes that the public phone box in Simonsbath is a traditional Red K6 Box; It is also recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Simonsbath because of its heritage value as a K6 red phone box. This is consistent with the National Park's statutory purpose to conserve and

enhance their cultural heritage⁸. The second reason is that there is very poor mobile coverage. Exmoor National Park Authority **objects** to the removal of the public phone box.

Withypool

This is a traditional box that stands in the centre of the small settlement of Withypool next to the village stores.

Withypool and Hawkrigde Parish Council has provided the following response:

“The Withypool & Hawkrigde Parish Council are very concerned over the threat of the removal of the phone box in the village of Withypool.

They believe there is still a legitimate reason for keeping the phone in the phone box active because as yet there is not a mobile phone signal throughout the village and if one does get installed in the future, visitors to the village with an alternative network will struggle to get a signal. The BT phone box is very visible in the heart of the village for all to use.

The Parish Council also feel that the 3-month check for the usage of the phone box clashes with COVID19 when the village did not have any visitors. Obviously, if they are basing their figures during this period and also backing on to the autumn/winter months, then there wouldn't have been many people walking through the village, however when the area is full of visitors then the phone box is needed. There are also many elderly residents who don't even have mobiles and so might need the phone in an emergency.

Therefore the BT Phone and Box in Withypool must stay”.

The National Park Authority notes that the public phone box in Withypool is a traditional Red K6 Box; It is also recorded on the Exmoor National Park Historic Environment Record. The National Park Authority considers that it is important to retain the phone box in Withypool because of its heritage value as a K6 red phone box. This is consistent with the National Park's statutory purpose to conserve and enhance their cultural heritage⁹ The second reason is that there is very poor mobile

^{8,9} National Parks and Access to the Countryside Act <http://www.legislation.gov.uk/ukpga/Geo6/12-13-14/97/2019-04-01>

coverage. Exmoor National Park Authority **objects** to the removal of the public phone box.

In addition to the above **Timberscombe Parish Council** have provided the following response although no boxes in the parish are currently at risk of removal:

The Timberscombe Parish Council are very concerned over the possible removal of phones within BT Phone boxes in surrounding villages. Whilst they themselves do not have a BT phone in their village they understand the importance of the land line phone in villages that do not have sufficient mobile phone signal. The fact that only the EE network functions in this area also means that anyone visiting with a different network will not be able to make a call. The Exmoor area is very remote and so a viable landline service in these isolated areas is necessary. Therefore, the Parish Council for Timberscombe wishes that all Exmoor Phone Boxes that are under threat are kept as fully functioning telecommunication services.

Exmoor National Park Authority would also like to take this opportunity to express some disappointment and frustration in how difficult it has been to extract information from BT as to their reasoning behind the removal of the boxes.

-The clerk for Luccombe Parish Council asked for how long and where the BT engineer recorded mobile signal in the village-no answer was received.

-The National Park asked BT to provide the minimum call number threshold before a box is considered for removal and how this number is then measured against the local population density. Clearly a rural phone will have less use than a phone box in a populated area and so this seems to be an important measure. No response was received.

-It is also our understanding that in 2019 Exford Parish Council made a FOI request to find out how much BT spend to maintain the box in Exford. As far as the National Park is aware no response was received.

The repeated efforts made by BT to remove boxes so quickly after previous consultations, (less than 12 months for 4 of the boxes listed in this document) is also of great frustration both to the NPA and the Parish Councils and we would seek reassurance from BT that all phone boxes across Exmoor National Park will be retained for the foreseeable future.