



Delegated Report

Telephone Box Removal Application

Planning Application No: 20260234

Location: Telephone Call Box Junction Of Love Lane And Parrock Street Gravesend
Kent

Description: Removal of public payphone.

Applicant: BT Group Plc

Site Visit Date: 10.03.2026

Submitted Documents/Plans

- Covering e-mail;
- Sample Copy of Notice; and
- Annex.

Relevant Planning History

None.

Site Description

The telephone kiosk is located on Parrock Street, just down from the junction with Clarence Place and adjacent to the green space in front of Christ Church Crescent and Christ Church Road. It is a grade II listed building and situated in the Windmill Hill Conservation Area.

Photos of the telephone kiosk



Public Consultation

It is a requirement of BT to carry out consultation by way of displaying of a site notice; this has been displayed inside the telephone box. The Council have also displayed a site notice with an overall consultation expiry date of 03.04.2026 – no responses received.

Proposed Development

This is a 90-day notice application for the 'Removal or relocation of a Public Call Box' but it is made clear in the submission that this is only to remove the telephony equipment and secure the kiosk and not remove the kiosk itself.

As stated, the telephone box is a grade II listed building and the following is stated in the covering e-mail in reference to telephone kiosks which are listed:

"Listed Kiosks

Some of the kiosks identified may be **listed structures**. These would be shown in **red text** on the attached list. For these, we propose to **remove the telephony equipment and secure the kiosk**. We will not remove the kiosk itself."

This telephone kiosk is listed and is shown as red on the list of kiosks in the covering e-mail. This therefore means the proposal is not to remove the telephone kiosk but to remove the telephony equipment inside and secure the kiosk.

Analysis

As part of the Ofcom review of the telephone universal service obligation (June 2022), Ofcom exercised its power to make a direction affecting the operation of the universal service conditions in relation to public call boxes on 14 March 2006 (the "Direction").

Direction

Modifications under sections 45, 67 and 68(3) and (4) of the Communications Act 2003 (the "Act") of Universal Service Conditions contained in Ofcom's notification under section 48 of the Act of 21 July 2003, and withdrawal under section 49 of the Act of the Public Call Box Direction dated 14 March 2006.

The following criteria for the removal of public call boxes is listed within the Ofcom Review of the Telephone Universal Service Obligation (2022);

Removal or relocation of Public Call Boxes including Last-at-a-Site PCBs

3.2 Subject to Conditions 3.3 and 3.4, BT may remove or relocate a Public Call Box.

3.3 BT may only remove or relocate a Last-at-a-Site PCB outside of the relevant Site where:

- (a) all UK-wide mobile network operators have coverage at the Site;
- (b) the Site is not a high frequency accident or suicide location;
- (c) fewer than 52 calls were made from the Last-at-a-Site PCB in the 12 months prior to the start of the relevant Representation Period; and
- (d) there is no other evidence of a reasonable need for a Public Call Box at the Site.

3.4 BT may only remove or relocate a Last-at-a-Site PCB in accordance with Conditions 3.5 to 3.14 (inclusive).

Notification and Publication Requirements

3.5 Where BT proposes to remove or relocate a Last-at-a-Site PCB, BT must:

- (a) display a notice in a prominent place on that PCB setting out:

- i) the Proposal, including the proposed new location, if applicable;
 - ii) contact details of the Relevant Public Body;
 - iii) the Representation Period; and
 - iv) the location of the nearest alternative Public Call Box; and
- (b) publish all of the information referred to in this Condition in an easily accessible place.

3.6 Where BT proposes to remove or relocate a Last-at-a-Site PCB, BT must give written notice to the Relevant Public Body setting out:

- (a) the Proposal, including details of the location of the Last-at-a-Site PCB and any proposed new location, if applicable;
- (b) all relevant evidence and other information in relation to the Removal Criteria;
- (c) the date on which the Site Notice was first displayed on the Last-at-a-Site PCB;
- (d) the Representation Period;
- (e) an explanation that BT is required:
 - i) to take due account of representations relating to the Removal Criteria made by the Relevant Public Body in making its Decision; and
 - ii) to provide written reasons for its Decision;
- (f) details of the process applicable to a Review of the Decision, including the deadlines implemented by BT as part of that process, in compliance with these Conditions; and
- (g) a copy of the Site Notice.

3.7 BT must set a Representation Period which ends no less than 90 days after the day on which the Site Notice was first displayed or the Written Notice was sent, whichever was later.

In order for the removal of a telephone call box to be acceptable and in accordance with Ofcom's rules, the following criteria must be met.

Responses should all be 'No 'in order for there to be no objection to the proposal.

No.	Criteria for Protection	Y/N
1	The box is in an area without coverage from all four mobile networks	N – it has mobile coverage of Vodafone, 02, Three and EE.
2	The box in in an area with a high number of accidents or suicides	N – The spreadsheet provided with the application states that it is not in a high frequency accident location as there is no pattern of serious accidents in close proximity. Also that it is not in a high frequency suicide location and this kiosk has

		not been identified by the Helplines Partnership..
3	The box has had 52 or more calls in the last 12 months	N – The spreadsheet provided with the application states that it has had a total of 3 calls in the past 12 months.
4	There is evidence that the box is needed for emergencies, such as flooding	N – The spreadsheet provided with the application states that there is no evidence of other reasonable need.
5	The box is used to call helplines	N - The spreadsheet provided with the application states that there have been 0 Helpline calls in the last 12 months.

As can be seen the telephone kiosk would not meet any of the criteria requiring protection which is laid out in section 3.3 of the Ofcom Review of the Telephone Universal Service Obligation (2022). In terms of these specific criteria, it can therefore be said that the proposed development for removal of the telephony equipment and securing the kiosk would meet the parameters set out in Ofcom's review of the telephone universal service obligation (June 2022).

However, the proposed works to remove the telephony equipment and the securing of the telephone kiosk requires Listed Building Consent as it would affect the special interest of this listed building. As such, this 90-day notice application for the 'Removal or relocation of a Public Call Box' is not the only procedure required and the applicant would also need to apply for Listed Building Consent for the proposed works.

Recommendation

No Objection

(See draft Decision)

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	<i>F Walsh</i>
Dated:	26th May 2026	Dated:	27 May 2026