

Dear Ian,

Regarding the above applications, I note from the Council Portal that Hampshire County Council (HCC) Highways have objected to the proposal and I would like to address the points in response.

The HCC comments that *'The proposed street hub is situated in the centre of a footway along London Road. Both national and local policy in the form of the Havant LCWIP and HCC Local Transport Plan 4 (LTP4) seek to prioritise pedestrian and cycle movements and provide a transport system which puts people first. The location of the street hub would result in an impediment in the pedestrianised area which is subject to high pedestrian footfall.'* It is the applicant's view that the proposal is to replace the existing kiosk, which occupies a larger amount of pavement space and therefore the conditions for pedestrian and cycle movements at best improve or would be considered to be neutral. It should also be noted that the features of the Street Hub provide a tangible benefit for pedestrians and cyclists with the free Wi-Fi and wayfinding services.

In addition, the Street Hub kiosk supports the reduction in the use of private car and increased use of public transport, cycling and walking through its touch screen wayfinding services that are supported by Government advice. Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure states in Chapter 12 as follows;

*'Digitally provided information and communications technology (ICT) is increasingly enhancing the accessibility of public transport infrastructure and the pedestrian environment. This section focuses on ICT commonly used in public transport: touchscreens, contactless ticketing, real-time information and wayfinding technologies. ICT has the potential to greatly improve and enhance the journey experience for public transport users. This includes supporting wayfinding, supporting intra-station navigation, and providing passengers with accessibility data about stations and stops so they can make informed travel choices regarding accessibility of services. I HCC continue, 'The Highway Authority believe that these hubs are primarily an advertising board, with the purpose of generating revenue for the operator/owner and are therefore not within the spirit of the New Roads and Streetworks Act.'*

I would also wish to take the opportunity to address HCC's comments that they '*believe that these hubs are primarily an advertising board, with the purpose of generating revenue for the operator/owner and are therefore not within the spirit of the New Roads and Streetworks Act.*' It should be highlighted that most existing kiosks support advertisement features, albeit a non-digital version and the use of digital screens for advertising on street furniture is becoming common place, with examples such as bus shelters that are present elsewhere in the town.

It is also important to emphasise that BT has an Electronic Communications Code license and Universal Service Obligation (USO) governed by Ofcom to provide and maintain publicly accessible call boxes on the street. In order to meet this requirement, it is obvious that new telephone kiosks are untenable, in the same way that KX100 units, for example, replaced red telephone boxes and as such, the Street Hub design is an upgraded version that allows BT to provide its service in an era of advanced communications. As such, the proposed advertisement feature is considered to be a legitimate means of income to subsidise the significant improvement to the free universal service compared to the limited paid call service that an existing kiosk provides, which is accepted and successfully used, for instance, as part of bus shelters throughout the UK.

The HCC consultation also notes that '*The Highway Authority therefore advise the applicant that they would require a suitable license or highways agreement for installation and agreement on how these would be maintained, or that the applicant provide further information should they disagree with this.*'

I would wish to respond by advising that all statutory requirements will be met, if the applications are approved and I would refer you to the Product Statement which outlines how the proposed Street Hub would be maintained. In summary;

*'The Street Hubs are visited every two weeks for cleaning, by hand and with pressure washers. The materials used make this process easy with defined materials and processes. Whilst cleaners are on site, they check for damage and ensure the tablets and screens are working. In addition, our in-field quality inspection teams visit at least every two weeks on an alternative schedule to our cleaning team.'* With regard to Monitoring and repair management, the Product Statement outlines that '*Street Hubs are monitored remotely 24/7, our primary mechanism to spot faults with the above local inspections ensuring the effectiveness of this monitoring. Once identified, we have*

*processes to resolve issues within agreed service levels. Most will be resolved within three working days, with safety and power issues having a more rapid resolution target than cosmetic issues like graffiti.'*

I would therefore be grateful if this further detail could be accepted for your consideration of the proposal and I would be happy to give you a call to discuss if that would be beneficial.

Kind regards

Alan