
FREETHS

UNIVERSITY OF PORTSMOUTH

LANGSTONE CAMPUS, FURZE LANE, PORTSMOUTH, PO4 8LW

WRITTEN REPRESENTATION (6th OCTOBER 2020)

Introduction & Background

1. The University of Portsmouth (“UoP”) has instructed Freeths to prepare the following Written Representation (“WR”) in relation to a site known as Langstone Campus, Portsmouth (“the Site”).
2. This WR outlines the detailed objections that UoP have to the Development Consent Order application for the AQUIND Interconnector (“the Proposed Development”), submitted by AQUIND Limited (“the Applicant”) to the Planning Inspectorate on 14 November 2019 for recommendation to the relevant Secretary of State.
3. UoP is not objecting to the principle of the Proposed Development as it appreciates the national energy objectives. The objection relates to the detailed implications of the Proposed Development. The Proposed Development has provided two options for the routing of the underground cabling, both of which would have severe impacts on the present operation and future development potential of the Site and UoP’s business. This was explained by UoP in their initial Relevant Representation.
4. The purpose of this WR is to provide the Applicant and the Examining Authority with a detailed explanation of UoP’s position and the operational and property impacts the Proposed Development will have on their landholdings and operations at the Site. This sets the context for a recommended alternative option to be considered by the Applicant and Examining Authority.
5. This WR has been also prepared to inform continued discussions with the Applicant.
6. The basis of UoP’s objection is as follows:
 - (i) **Operational:** disruption to the provision of sports facilities to its students and the local community together with impact on the University’s business.
 - (ii) **Future Development:** the main Campus site offers excellent potential for future residential development to meet the City’s housing needs and supply. The proposed route will impact on the site’s capacity and potential.
7. There is an alternative option available to the Applicant to avoid these impacts which has not been explored or considered in their Options analysis. We recommend this alternative option is considered further by the Applicant and Authority, subject to the Applicant providing further clarification on the specific impacts and characteristics of the Proposed Development. The background to this recommendation and UoP’s position is explained further overleaf.

The Site

8. The Site is located 3.5km to the east of Portsmouth City Centre and extends to approximately 13.8ha. It is in the control of UoP. The Site is in two broad parcels east and west of Furze Lane which forms the only access and link to the wider highway and pedestrian network. This is accessed from the south via Locksway Road as there is no access from the north.

Sports Centre

9. The western parcel is accommodated by UoP's Langstone Sports Centre which includes a full size 3G pitch, 5-a-side astro turf pitches, tennis courts, a hockey pitch and multiple football and rugby pitches. The Centre has an essential role in the provision of sports and leisure opportunities for UoP's students and staff. It is the only playing pitch facility owned by and available to UoP in the City and has a significant role in offering sports participation, competition for sports teams and healthy lifestyles. It also plays an active role in the academic programme for a number of courses.
10. UoP activity at the Centre extends to the following:
 - The British University & College Sport ("BUCS") training and competitive program runs from September to April each year with 2,000+ student club members. This is a significant volume of activity that UoP cannot host externally.
 - Participation programs that run from September to June each year supporting 1,000+ students.
 - Academic research with students undertaking practical aspects of sports science dissertation projects.
 - Organised events including: Varsity (takes place in February each year); Summer language schools (June - September each year); a China UK rugby exchange; and multiple National Governing Body coach education training courses hosted on Site throughout the year.
11. Access is required all year round to the Site to undertake grounds maintenance on a daily basis.
12. The facility has been identified to operate as a Euro 2022 Women's Football Championship training site during summer 2022. For this, the Site would need to be fully prepared and accessible during April - August 2022.
13. UoP is in the progress of constructing a new indoor Sports Building on its campus in the City Centre to be delivered in 2021. This is a different proposition to Langstone which has the space for multiple playing pitches which are not available in the City Centre Campus and environs.
14. UoP is also recognised for its sports courses which are among the most popular in the country and a strength which attracts students. The ongoing pandemic is having a significant impact

on Universities in general. Any proposals that will have a further impact on the operations and attraction of UoP should therefore be avoided at this particularly sensitive and challenging time. For instance, if the lack of available sports facilities caused by the Proposed Development was highlighted in a future National Student Survey, this would have a consequential impact on the ability of UoP to attract students to its courses.

15. The Centre also has a wider function and contribution to the City's open space offering by being available for use by the local community by over 25 different community user groups. This extends to the following:
 - Portsmouth Football Club;
 - Portsmouth Womens FC;
 - Pompey in the Community (an independent charitable trust affiliated to Portsmouth GC offering football coaching and activity for the local community and specific groups);
 - Portsmouth College;
 - Portsmouth High School (delivered via a 25yr partnership arrangement for access to facilities in the School); and
 - St John's College.
16. The Sports Centre is used in this way by these groups for 50 weeks of the year and is only closed for 2 weeks over the Christmas period. Any disruption to these groups could see them leave and choose another facility for their long term provision. This would not only affect those groups but also have a significant financial impact on UoP.
17. The Sports Centre is also identified for investment and improvement. A resurfacing of the Hockey Pitch is planned in late 2021 which will take 8-12 weeks to complete. This will involve replacement with a 3G carpet surface. The improvement in quality is likely to lead to a 50% increase in income related to 3G pitch if that carpet type is fitted.

Campus Site

18. The eastern parcel comprises of a large area of previously developed land formerly occupied by academic and student accommodation buildings which formed the Langstone Campus. Apart from Barnard Tower and the Northern Trust Accommodation, the majority of the buildings and structures were demolished in 2019 after the Site became surplus to UoP's operational requirements.
19. The Barnard Tower building is currently used for fortnightly high rise building fire training by the Hampshire Fire & Rescue Service. There are currently no other suitable training locations for the Service to use so it is recognised by the Service as an important facility. This is a temporary use pending the Site being redeveloped.
20. On the Site, there is also an essential radio link to UoP's Home Office Licenced research facility on the Institute of Marine Sciences campus at Eastney. Due to the cost of re-provision, the link would remain and have to be incorporated in some form as part of any redevelopment.
21. Options for the future use of the land remain under review but residential development is one of the likely options to be a route taken forward.

22. Land to the east of the Campus site remains in use as sports pitches associated with the Langstone Sports Centre.

The Proposed Development and the Site

23. The Order Limits and Land Plans (Sheet 9 and 10/10) identify the following affecting UoP's land:
- (i) New Landscaping Rights on the western boundary of the Campus site (Refs: 9-21 and 9.24);
 - (ii) Temporary use of land in the north-western corner of the Campus site (Refs 9.22-9.23);
 - (iii) New Landscaping Rights alongside the Langstone Sports Centre boundary (Ref: 9-25); and
 - (iv) New Connection Works Rights on the eastern edge of the Campus site on existing playing pitch land (Ref: 9-26).
24. New Connection Works Rights are also noted along Furze Lane (Ref: 9-27). This is adopted Highway but offers the only form of access to the Campus and Sports Centre sites.
25. It is not clear or explained in the Application submission why two north-south connection rights areas have been identified. Both have significant impacts on UoP land and operations.
26. It is noted in the Planning Statement (WSP, November 2019 see paragraph 5.3.13.20 bullet point 6) that the playing pitches on the eastern part of the Campus will be restricted for up to 8 weeks. There are no specifics offered in terms of the following:
- Why the land is required given the north and south onshore cable corridor options.
 - Why two Connection Works Rights are necessary on a north-south route in this area. The options analysis in the Environmental Statement (see Volume 1, Chapter 2, paragraph 2.6.6.21) identifies the two options but there is no explanation of why the two remain in the Order.
 - If only one route is required does that mean the other is not? The rationale for two routes requires further explanation as it is not outlined in the Alternatives assessment in the submitted Environmental Statement.
 - The programme of works and the approximate timing in the calendar and academic year.
 - Whether the works also involve the complete or partial removal of access to Furze Lane and the Langstone Sports Centre during that period. In the absence of any explanation from the applicant it has to be assumed they will.
 - What is the extent of works required on the playing fields and how does this relate to the extent of the Rights Land identified?
 - Can the restoration activity to the playing fields be completed within the 8 week period?
 - What allowance within the programme has been made for damage that may occur to the pitches? Once allowance is made for planting season constraints this is very likely to take this programme beyond 8 weeks whilst the earth is remodelled and grass re-laid.
 - What future maintenance works will be needed on the Rights land and what specific areas will require permanent access. Depending on the extent access/maintenance zones this

will have a significant and permanent impact on the operation of the Langstone Sports Centre, playing fields and the development potential of the Campus.

- What maintenance and management arrangements are proposed for the new landscaping areas?
- Will there be easements on the Connection Works Rights land which then impact upon the ability to develop the Campus site and future land use options such as residential and associated amenity space?
- What consideration is given to the protected TPO trees along Furze Lane?
- What consideration is given to the bus route and highways interruption caused by works to Furze Lane?
- The high voltage cable environment and the impact this could have on the essential radio link to the Home Office Licenced research facility at IMS Eastney.

27. Clearly, these are significant areas of concern as both of these options will have a detrimental effect on the running of the Langstone Sports Campus, and will also severely affect the redevelopment potential of the Site. The context to this is explained below.
28. Further information and clarification from the Applicant is sought on these points. This will also offer important background to considering the feasibility of the identified potential alternative option recommended by UoP.

Sports Centre & Playing Pitch Impacts

29. Any restriction on the ability to access and operate the Langstone Sports Centre will have a significant impact on UoP's ability to provide academic and sporting activities and opportunities. Even a temporary closure or restricted access to the Centre will have a significant effect on UoP.
30. Based on UoP's records, the Langstone Sports Centre is a significant revenue generator and a key part of its business. Based on records for the last 2 calendar years (2018-2019), the Centre generally has 93,075 of operational hours of capacity per annum. In 2019, this provided circa £102k of revenue. This revenue is used by UoP to support the operation and management of the facility.
31. Any loss in ability to access the sporting facilities over an approximate 2 month period, could result in a loss of over 1,000 hours' worth of potential income. This is without factoring in the potential knock-on impact of wider effects on the availability and operation of the Site if the 8 week period is insufficient to complete the work and restore the site plus the ongoing access rights that are to be given. Any loss of income is not available from alternative sources and therefore represents a significant financial threat to UoP.
32. Additionally, the Sports Centre supports summer business for language school sports provision generating revenue. It has not been possible to secure this income in 2020 due to the current pandemic. If the ability to secure such income in 2021/2022 were to be affected then it is unlikely that this business would return to Portsmouth.
33. The operational and social impact of not being able to operate the Langstone Sports Centre is also significant and cannot be quantified. Due to the nature of the Portsmouth urban area and

the finite supply of sports facilities in the city, there are no alternative options for sports provision available to UoP in the event that access to Langstone is removed. The loss of the Langstone Sports Centre would therefore remove a key element of UoP's sporting and academic offer.

34. Even in a temporary period, this would have a significant effect on day-to-day academic and sporting activities of UoP, having a negative impact on the opportunities and experience of its students and the significant range of activities that take place. It would also have a significant impact on the permanent community user groups. As identified from the lists provided at paragraphs 10 and 15 above, the activities that take place are either permanent or seasonal and there is no particular time period or window available that could facilitate the works taking place. As such, this will have a major operational and programming impact on not only UoP but also those community groups that regularly use the Sports Centre and Site.
35. To fully understand and quantify the level of social and economic impact, UoP requires further information from the Applicant on the scheme observations identified at paragraph 26 above. Without this, it is clear the impacts are significant, so alternative locations for the route should be actively considered by the Applicant.

Redevelopment of Langstone Campus

36. Following the relocation of the student accommodation uses at the Site and the closure of the associated buildings, the Site has in our view strong redevelopment potential for alternative uses.
37. According to the Portsmouth Plan Proposals Map which forms part of the statutory Development Plan for the area, the previously developed elements of the Site are not allocated/designated for any specific purpose. In the absence of any wider planning policy constraints and requirements on the land, the site is most suitable for residential development in principle subject to detailed considerations.
38. The Site can make an important contribution towards housing needs and delivery in the City. The potential allocation of the Site in the emerging Local Plan will be of importance to PCC in their housing delivery across the Plan Period. As of October 2018, PCC were set a housing target of 17,260. In the Annual Monitoring Report (March 2019), PCC stated that it cannot demonstrate a 5 Year Housing Land Supply with only an identified supply of 4.7 years. It is therefore important that PCC identifies sufficient land for residential development as part of its current Local Plan and the ongoing Local Plan Review.
39. The Site has already been identified for residential development by PCC in the progress made to review its Local Plan to date.
40. In 2013/14, the Site was included in the Further Proposed Site Allocations document for residential development which was supported by UoP. This Local Plan Review ultimately did not progress and the Review has started afresh. It nonetheless set an early indication of the Site's contribution and potential.

41. In August 2017, PCC published an Issues & Options consultation. This identified the St James and Langstone Campus sites as a Proposed Strategic Site allocation. This was supported by UoP and in tandem with the owners of the St James site, the parties worked together to formulate a Development Principles and Framework Document to identify the capacity of the two parcels for residential development and the issues to be addressed in delivering them as part of planning applications. This analysis identified that the Site has the capacity to accommodate between 310-410 homes on the previously-developed section. This was based on a scheme to be accessed by Furze Lane (from the south) which is the only option available.
42. The Housing and Economic Land Availability Assessment (PCC, February 2019) identified that the indicative capacity for residential development across St James's Hospital and Langstone Campus is 340 to 460 dwellings. A figure for the Campus was not specifically identified but this identifies that PCC continues to consider the Site as contributing to the housing requirements of the Local Plan Review.
43. The next stage of the Local Plan Review is to be confirmed by PCC. Based on the Site's potential and the policy context to date, it is expected that the Site will be allocated. UoP will continue to work closely with PCC on this to realise the Site's potential.
44. The proposed cable routing options will have a significant impact on the ability to deliver a viable and credible scheme on this part of the Site. The questions at paragraph 26 identify the extent of uncertainty that exists regarding the impact of the Proposed Development on the Site in terms of access, developable area, maintenance obligations and easements. A response is required from the Applicant on these questions so that UoP can understand the impact further and present this to the Examination Hearing.

Cabling Route Alternative

45. Due to the impact of the proposed routes, UoP recommends the Applicant also gives consideration to Alternatives which will not have the economic and social impact that has been identified and will be much less disruptive.
46. UoP recommends that consideration is given to removing the Furze Lane route entirely. The land required to the east of the Campus should be moved further east to along the boundary of UoP's ownership. This would remove the significant playing pitch revenue and operational conflicts on the Sports Centre and the potential impact on the future development potential of the Campus site.
47. The feasibility of this route requires further consideration by UoP based on the information that the Applicant provides in responses to some of the questions outlined at paragraph 26. It does however have the potential to prevent any unnecessary and avoidable disruption and impact on UoP's operations from the Site and as such should be seriously considered going forward into the Examination of the Proposed Development. We request the Applicant reviews this further and reports back to us.
48. We also recommend that the Examining Authority visits the Site in order to understand the context.

Conclusions & Next Steps

49. We trust this Representation clearly outlines the current position of UoP in relation to the proposed scheme.
50. We wish to work with the Applicant during the course of the Examination as follows:
- (i) We request additional information from the Applicant on the matters raised at paragraph 26.
 - (ii) The operational and development potential implications of the Proposed Development are significant and we wish to explore the principle of the alternative route recommended to address the impact. This will also need to be informed by answers to some of the paragraph 26 matters which will inform a greater understanding of the feasibility of such an alternative route.
 - (iii) If this alternative is not possible, we would welcome further discussion with the Applicant on how the concerns of UoP can be addressed satisfactorily to reduce the extent of impact identified.
51. Should the suggested alternative cable location not prove possible, we wish to maintain this objection as a matter of principle due to the significant impacts on UoP's operations and land as identified in this Statement.

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