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# FREETHS

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UNIVERSITY OF PORTSMOUTH

LANGSTONE CAMPUS, FURZE LANE, PORTSMOUTH, PO4 8LW

SUMMARY WRITTEN REPRESENTATION (6<sup>th</sup> OCTOBER 2020)

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## Introduction & Summary

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”). This is a summary of the Main WR.
2. 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.
3. A detailed explanation of the Site’s uses are outlined in the main WR.
4. It is not clear or explained in the Application submission why two connection rights areas have been identified. Both have significant impacts. There are also a number of detailed matters which require further information and clarification (see Main WR paragraph 26).
5. The main WR provides a comprehensive overview of the impacts on UoP’s land and operations. These are significant areas of concern as both options will have a detrimental effect on the Site.
6. UoP recommends 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 conflicts and impacts identified.
7. The feasibility of this route requires further consideration by UoP based on the information that the Applicant provides in response to paragraph 26 of the Main WR.
8. We wish to work with the Applicant as follows:
  - (i) Request additional information on the matters identified in the Main WR.
  - (ii) Explore the principle of the alternative route base on the information requested.
  - (iii) If this alternative is not possible, further discussion with the Applicant on how UoP’s concerns can be addressed satisfactorily to reduce the extent of impact identified.
9. 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.

**Mark Harris & Daniel Hyde  
Planning & Environment Group  
Freeths LLP**