

From: [Mark Harris](#)
To: [Aquind Interconnector](#)
Cc: [Daniel Hyde](#); [Evans, Kee](#)
Subject: EN020022 / Application by AQUIND Limited: Open Floor Hearing Statement on behalf of the University of Portsmouth
Date: 30 November 2020 18:16:16
Attachments: [image820885.png](#)
[image020216.png](#)
[image412650.png](#)
[image565616.png](#)
[UoP Hearing Statement_301120_FINAL.pdf](#)

Dear Sir / Madam

We act on behalf of the University of Portsmouth and have been instructed to provide the attached Open Floor Hearing Statement in advance of the Hearing on 7th December 2020. This includes an update on our discussions with the Applicant. If there are any further discussions before the OPH, we will advise accordingly.

Given the content of the Statement, we would also welcome the opportunity to attend the Compulsory Acquisition Hearing 2 (11th December). The content of this Statement informs that Hearing. Both myself and Kee Evans of Eversheds Sutherland (copied in) will attend on behalf of the University.

In the meantime, should you have any queries or wish to discuss further, please do not hesitate to contact Daniel Hyde or myself. Otherwise, please provide confirmation of receipt of this submission.

Regards,

Mark

Mark Harris

Partner

T: 02074405181

F: 0845 050 3250

M: 07970 430975



FREETHS

Freeths LLP

1 Vine Street, Mayfair

London W1J 0AH

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APPLICATION BY AQUIND LIMITED

OPEN FLOOR HEARING STATEMENT ON BEHALF OF THE UNIVERSITY OF PORTSMOUTH

OPEN FLOOR HEARING 1: MONDAY 7TH DECEMBER 2020

30th NOVEMBER 2020

Introduction

1. My name is Mark Harris. I am a Chartered Town Planner and Partner in the Planning & Environment Group of Freeths. I am representing the University of Portsmouth (“UoP” or “the University”) in relation to this application and specifically their objection due to the impact on their Langstone Campus site.

The University of Portsmouth’s Case

2. The University’s objection has been presented in their Relevant Representation and submissions to the Examining Authority so far, namely:
 - (i) Written Representation dated 6th October 2020; and
 - (ii) Statement of Common Ground with Portsmouth City Council (“PCC”) dated 3rd November 2020.
3. The basis of the University’s case is clear so I do not intend to repeat that to the Examining Authority. Instead, as part of this Statement, I wish to provide the Examining Authority with an update on discussions that have been held with the Applicant and additional evidence/information to assist the Examining Authority with the matters raised by the University.

Discussions with the Applicant

4. We met with the Applicant’s team on Friday 20th November 2020 to discuss the points arising from our representations. Following the meeting, the University provided the Applicant with additional information to assist in the Applicant’s consideration of their objection and the matters raised. The emails and enclosures sent by Fiona Bell (the University’s Director of Estates & Campus Services) on the 22nd and 23rd of November 2020 are provided at **Appendix 1**.
5. A meeting note was prepared by Avison Young on behalf of the applicant dated 20th November 2020 and issued to us on 27th November. This is provided at **Appendix 2**. As the meeting note was received on the 27th and due to the need to prepare this Statement in advance of Deadline 5, we were not able to agree a Statement of Common Ground with the Applicant. This Statement therefore focuses on the key areas of agreement and disagreement between the University and the Applicant.

Furze Lane Agreement

6. The University notes and welcomes the Applicant's proposed omission of the Furze Lane route from the Order Limits. Subject to this being confirmed by the Examining Authority, this removes that part of their objection.

Disagreement

7. The University continues to object to the proposal based on the impact it will have on the following:
 - (i) Impact on recreational activity on the playing pitches to the east of the Langstone Campus site.
 - (ii) Development potential of the Campus site.

Recreational Activity Impact

8. The playing pitches are identified on Plate 5 of the Applicant's Framework Management Plan for Recreational Impacts (ES Addendum Appendix 13 (WSP, November 2020)). These form part of the overall Sports Centre offering grass sports pitches which are used for all of the activities described in our Written Representation (see paragraphs 10-16). The use of the pitches is therefore wider than the description given (see paragraph 4.2.3.2) by the Applicant.
9. I note from the Applicant's Framework Management Plan that mitigation measures are proposed to "*minimise effects on users of recreational and open space sites*". For the Langstone site this will comprise "*...temporary mitigation during periods of disruption...*" extending to "*..where sports pitches are affected, reconfiguring pitches to maximise use of unaffected areas.*" (see fourth bullet point on page 4 of 31).
10. Since our Written Representation, it has been established through the Applicant's submissions that the area of the pitches will be required for a period of circa 16 weeks which has been timed to coincide with the Applicant's perceived period of lowest use outside of the Football and Rugby seasons from April 2022 onwards. As is clear from our Written Representation, the pitches will remain in use during that time including as a training site for the Euro 2022 Women's football championship. This is an internationally significant use of the site which will have important economic and social benefits for the profile of both the University and City.
11. Plate 5 seeks to demonstrate how the pitches can be reconfigured during the construction period to protect pitch capacity with no continuous impact. This does not allow for the installation of a temporary haul road and for drainage and storage of soil during construction (as clarified in the Applicant's Response to Deadline 3 (see page 2-88 section 6)). The use of such an area is reflected in the width of the proposed Order Limits which when compared with Plate 5 demonstrates that pitch capacity will be reduced to nil during the 16 week period.
12. On this basis, I conclude that the mitigation proposed by the Applicant is simply not realistic and not deliverable. As it is agreed there is no wider playing pitch capacity in the City which

offers an alternative location during the construction period, the significance and magnitude of the impact on the University and recreational activity is clear.

13. We note from the meeting with the Applicant that the cables will be installed using open trenching rather than HDD as this is considered to be less disruptive (see paragraph 2 page 2 of the **Appendix 2** meeting note). This has not been demonstrated to the satisfaction of the University.
14. The information provided in the email at **Appendix 1** also highlights the challenges faced by the Applicant in restoring the pitches to their pre-construction state. The University's specialist pitch consultant (Sports Field Design Ltd) identifies the time variables involved. For re-turfing in ideal conditions it could be 6 weeks but is more likely to be 3-4 months. If the area is seeded in ideal conditions with intense management it could be playable in a minimum of 12 weeks but is more likely to extend considerably beyond that. This extends far beyond the 8-10 week period estimated by the Applicant and intrudes into sport seasons the Applicant's timetable attempts to avoid. The periods have also been confirmed by the Applicant to be estimates and need to be verified by the appointed contractor and through soil investigation and drainage surveys. This is potentially misleading as the ability to reinstate is more dependent on weather conditions and the extent of damage by construction traffic and associated activity. If the Applicant still needs access to the site to undertake surveys on-site, the University is happy to provide access subject to business need and operational requirements.
15. The duration of pitch unavailability has in my view been under-estimated and should be extended to offer a worst-case assessment of the impacts. This is particularly important to understand and evaluate given there is no genuine mitigation available.

Development Potential of the Campus Site

16. The Applicant is correct to identify the ecological and open space related constraints of the Site and how the development potential may in planning policy terms be focused on the previously-developed element.
17. The Applicant's response does not however consider the potential for development in this area to be based on a land-use swap arrangement. This would maximise the Site's development potential and its relationship with the waterfront of Langstone Harbour. This would also be a key benefit for any scheme.
18. A land-use swap could work on the basis that development would take place on the same equivalent site area as the existing previously-developed area. This area would be moved to a more attractive part of the Site (i.e. the existing playing fields / waterfront) whilst ensuring that there is suitable compensatory arrangements for replacing the open space/playing fields elsewhere within the site and ensuring no impact on the ecological value of the site. Such an approach could be achievable under paragraph 97 of the NPPF.
19. It is recognised that further investigations are necessary into this option including how Brent Geese operate and fly into and use the site. Based on known activity on the Site, one option is to maximise the northern and southern site components of the overall parcel and allow the central element to continue to be used by Geese which would then link with how they use the

pitches on the northern side of the Sports Centre, on the opposite side of Furze Lane. This would also position the new and replacement pitches closer to the Sports Centre and provide a much greater and valuable connections for users. These and other potential land use swap options require further investigation but they remain valid options for the University.

20. Such a masterplan approach and the flexibility offered by the size of the Site would not be possible with the proposed cable route and easement. This will sterilise a substantial and valuable part of the site in proximity to the waterfront thereby undermining the Site's development potential and the opportunity presented by it.

Conclusion

21. As identified, the University has genuine concerns regarding the impact of the proposed works on its Langstone site. Our conclusions and recommendations to the Examining Authority are:
 - (i) The pitches will not be available to the University and the activities planned from April 2022 for at least 16 weeks and potentially more depending on the success and feasibility of reinstatement. Due to the planned use of the pitches as a training facility in 2022 for the Euro 2022 Women's football championship this is the worst year for the University compared to alternatives in the lifetime of the proposed development's construction period.
 - (ii) There is no mitigation proposed by the Applicant as the area used for the pitches is required for construction related activity which renders their proposal for temporary pitch realignment unachievable. This is reflected in the area of land take in the Order.
 - (iii) Due to the nature of the University's use and activities planned during the construction and reinstatement period and the absence of any off-site options, the impact on the University's recreational activity and business is severe as identified in our submissions to date and not a moderate adverse effect as identified by the Applicant.
 - (iv) The method of construction in terms of the potential alternative use of HDD rather than open trenching requires further consideration and investigation by the Applicant based on exactly what is involved in terms of land take.
 - (v) The proposed cable route and extent of the easement will undermine the development potential of the site and the maximum flexibility offered by a land use swap arrangement. Further details are also needed in terms of the maintenance of such an easement.
22. The University has not been given any comfort that their outstanding objections can be overcome or that there is any mitigation that can ameliorate their position. Since it has not been satisfied by the response of the Applicant to date, the University's objection must be maintained.

Mark Harris
Partner, Planning & Environment Group
Freeths LLP

Heidi Berresford-Hemmens

From: Fiona Bell <fiona.bell@port.ac.uk>
Sent: 24 November 2020 12:56
To: O'Sullivan, Alan (Avison Young - UK)
Cc: Mark Harris; Evans, Kee
Subject: Fwd: URGENT
Attachments: Barnard - IMS link.jpg; Langstone Programme.xlsx

Dear Alan

Please find attached excel document which clearly demonstrates the information about usage that was in our Written Representation and for which mitigation is required.

Please also see below regarding IMS link.

Regards

Fiona

Fiona Bell
Director of Estates & Campus Services
University of Portsmouth
Tel: 023 9284 2451
Email: fiona.bell@port.ac.uk
W: www.port.ac.uk

 **HANDS** Wash or sanitise frequently

----- Forwarded message -----

From: **Richard Bell** <richard.bell@port.ac.uk>
Date: Tue, 24 Nov 2020 at 10:58
Subject: Re: URGENT
To: Chris Luff <chris.luff@port.ac.uk>

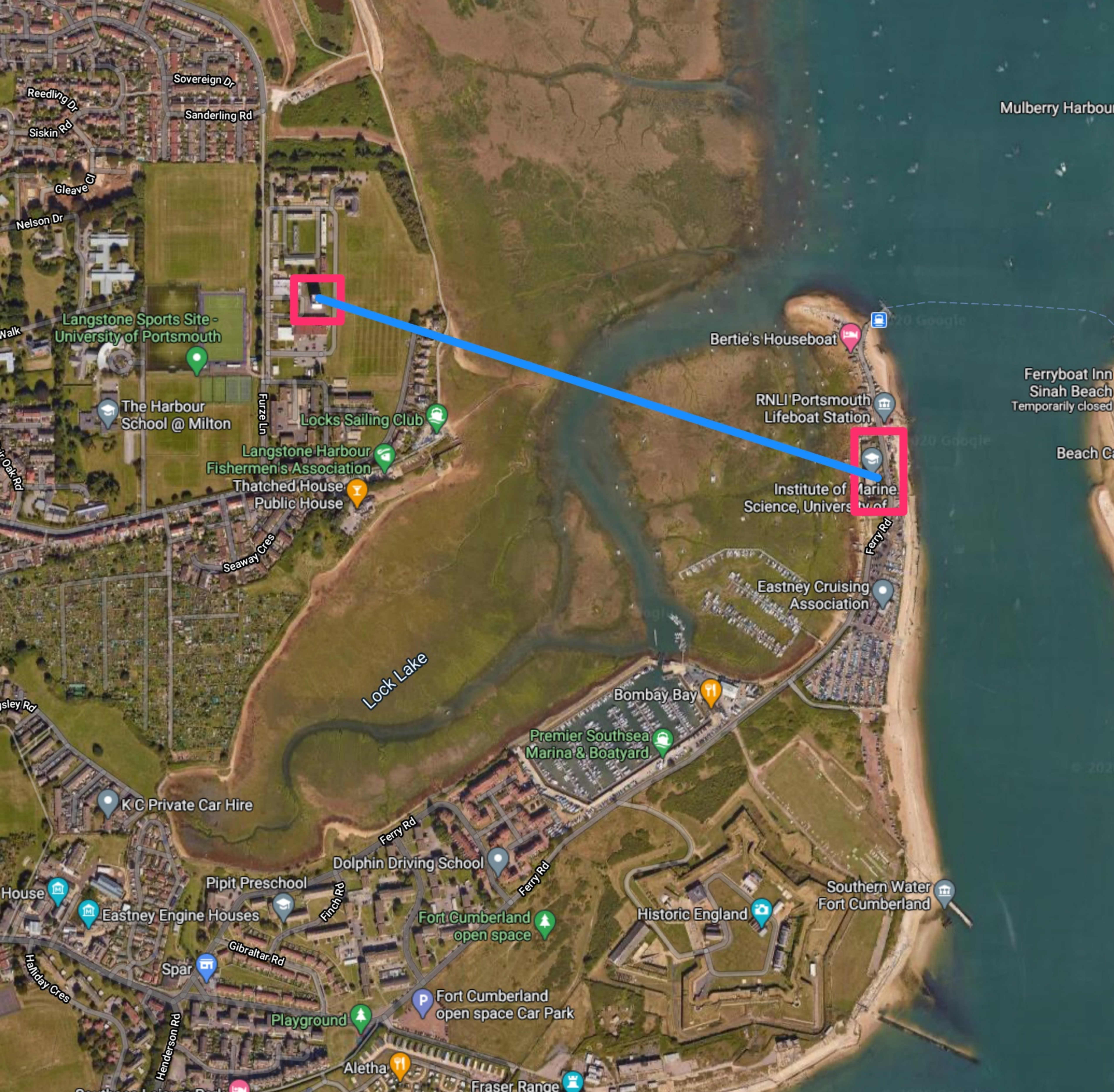
Hi Chris, please see the attached image. It shows the route the wireless signal takes across Langstone Harbour. My concern would be with any large machinery that could generate an electro-magnetic field that could interfere with this wireless link.

Additionally, any large machinery that may cross the path of the link as any blockage would result in disconnections, however this would have to be very high as Barnard tower is at least 12 storeys.

Richard Bell
Network and Security Services Manager

Additionally, any large machinery that may cross the path of the link as any blockage would result in disconnections, however this would have to be very high as Barnard tower is at least 12 storeys.

Richard Bell
Network and Security Services Manager
University of Portsmouth
T: 02392 845542
E: richard.bell@port.ac.uk
W: www.port.ac.uk



Sovereign Dr
Sanderling Rd
Reedling Dr
Siskin Rd
Gleave Ct
Nelson Dr

Langstone Sports Site -
University of Portsmouth

The Harbour
School @ Milton

Locks Sailing Club

Langstone Harbour
Fishermen's Association

Thatched House
Public House

Bertie's Houseboat

RNLI Portsmouth
Lifeboat Station

Institute of Marine
Science, University of

Eastney Cruising
Association

Lock Lake

Bombay Bay

Premier Southsea
Marina & Boatyard

K C Private Car Hire

Dolphin Driving School

Pipit Preschool

Eastney Engine Houses

Fort Cumberland
open space

Historic England

Southern Water
Fort Cumberland

Spar

Fort Cumberland
open space Car Park

Playground

Aletha

Fraser Range

Mulberry Harbour

Ferryboat Inn
Sinah Beach
Temporarily closed

Beach C

Heidi Berresford-Hemmens

From: Fiona Bell <fiona.bell@port.ac.uk>
Sent: 24 November 2020 09:48
To: O'Sullivan, Alan (Avison Young - UK)
Cc: Mark Harris; Evans, Kee
Subject: Acquind Interconnector
Attachments: Langstone services-2 (3).pdf; Eastern boundary access.docx; Langstone Underground Services Survey.pdf; Sports Pitch Maintenance Schedule Extract.pdf

Dear Alan

Further to your request for information on Friday in connection with Langstone I can confirm the following:

1. Land drainage plan for Eastern part of site - do not hold these records
2. Management and maintenance of pitches - please find attached extract from our maintenance contract.
3. Reinstatement of playing pitches - as per my email yesterday the grass pitches are not subject to accreditation only 3G pitches however our specialist consultant has advised the following:
 - Reinstatement is dependent on time of year, weather conditions, width of trench, plant causing associated damage and compaction, intensity of management after reinstatement.
 - In ideal conditions with thick turf, the trench is not too wide, well watered and managed in good weather with good growing conditions it could be reinstated after 6 weeks but it is more likely to extend to 3 to 4 months.
 - If the area is seeded under ideal conditions with intense management it could be playable in a minimum of 12 weeks but again more likely to extend considerably beyond that.
4. I attach copies of our underground services survey for Langstone and additionally a separate services plan.
5. I attach an image of the eastern access which is only pedestrian access.
6. In respect of Womens Euros 2022 we have been selected as a venue for a training site but details are not sufficiently developed to advise if any part of LSV will not be required therefore we must assume that we need it all.

I am still awaiting the information from IS regarding the link to IMS and will forward an excel document demonstrating how the facility is used throughout the year in order that you can understand the mitigation required as it was clear on Friday that this was not understood by your team.

Regards

Fiona

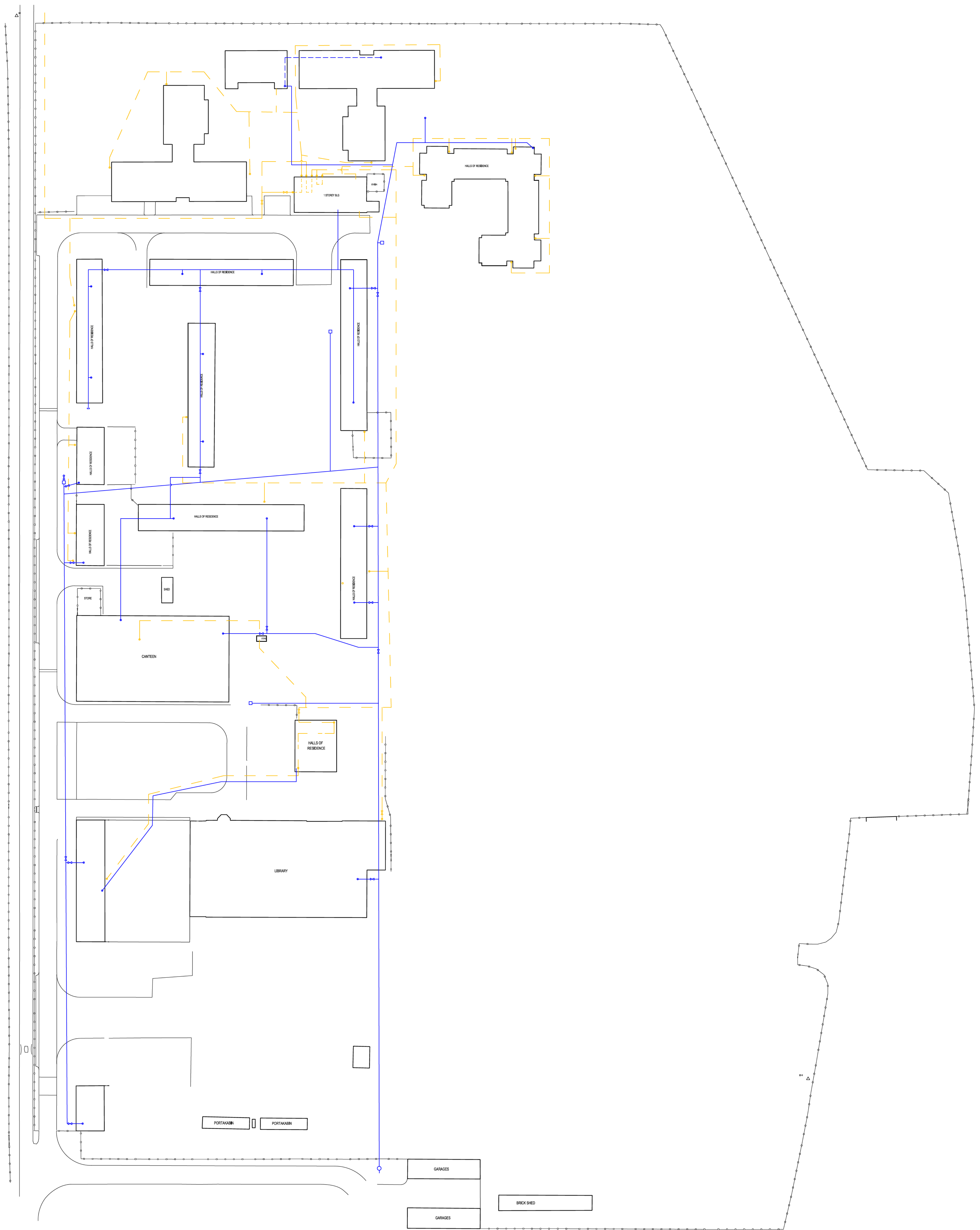
Fiona Bell
Director of Estates & Campus Services
University of Portsmouth

Tel: 023 9284 2451

Email: fiona.bell@port.ac.uk

W: www.port.ac.uk

||| HANDS Wash or sanitise frequently



LEGENDS	

Rev: _____ Notes: _____ Date: _____

AQUATECH
 ENGINEERING LTD
 GREENLANDS BUSINESS CENTRE
 STUDLEY ROAD
 REDDITCH
 WORCESTERSHIRE
 B98 7HD
 TEL: 01527 517346 FAX: 01527 517268
 E-MAIL: AQUATECH@CLARA.NET
 Title: _____

Client: _____

Drawing No: _____

Scale: _____ Date: _____
 Sheet: _____

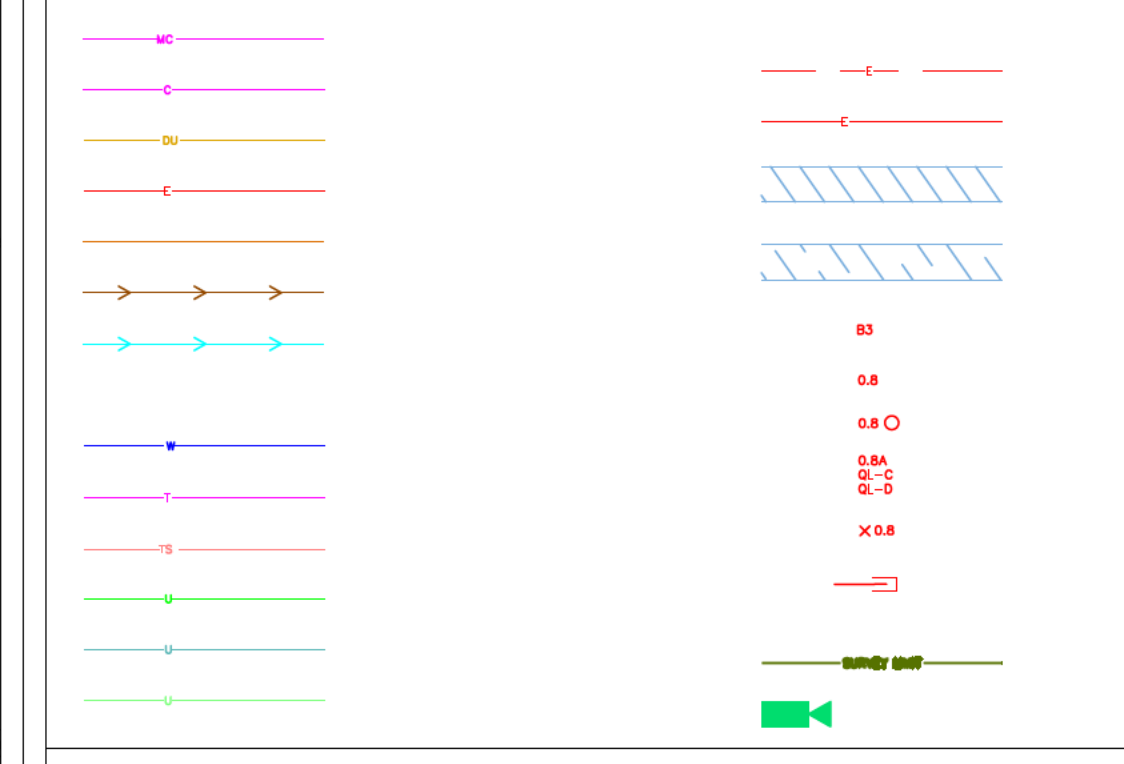
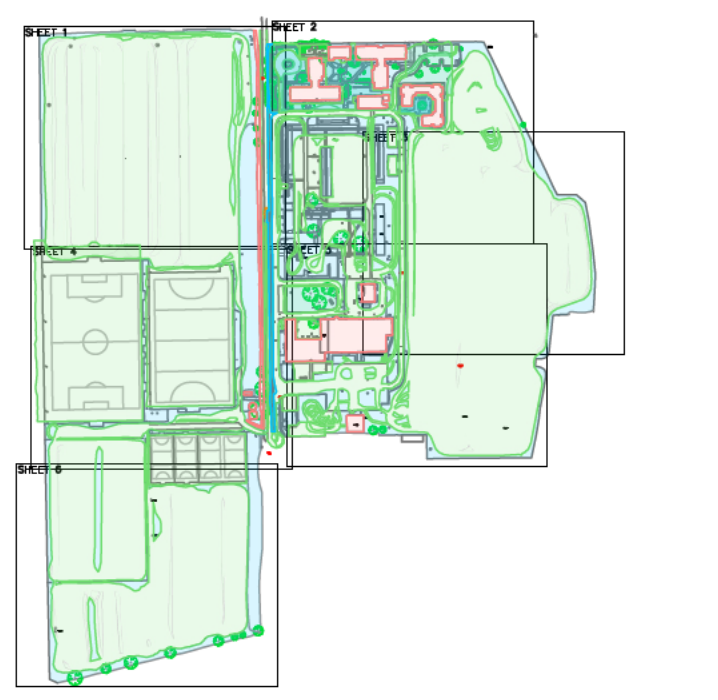
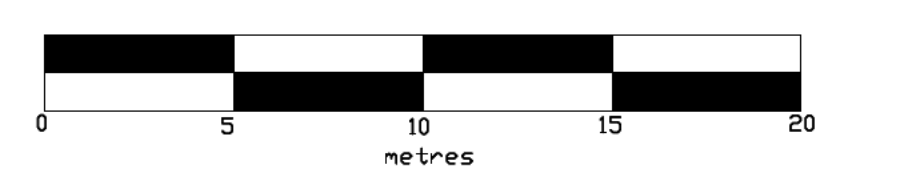
Eastern Boundary Access Point



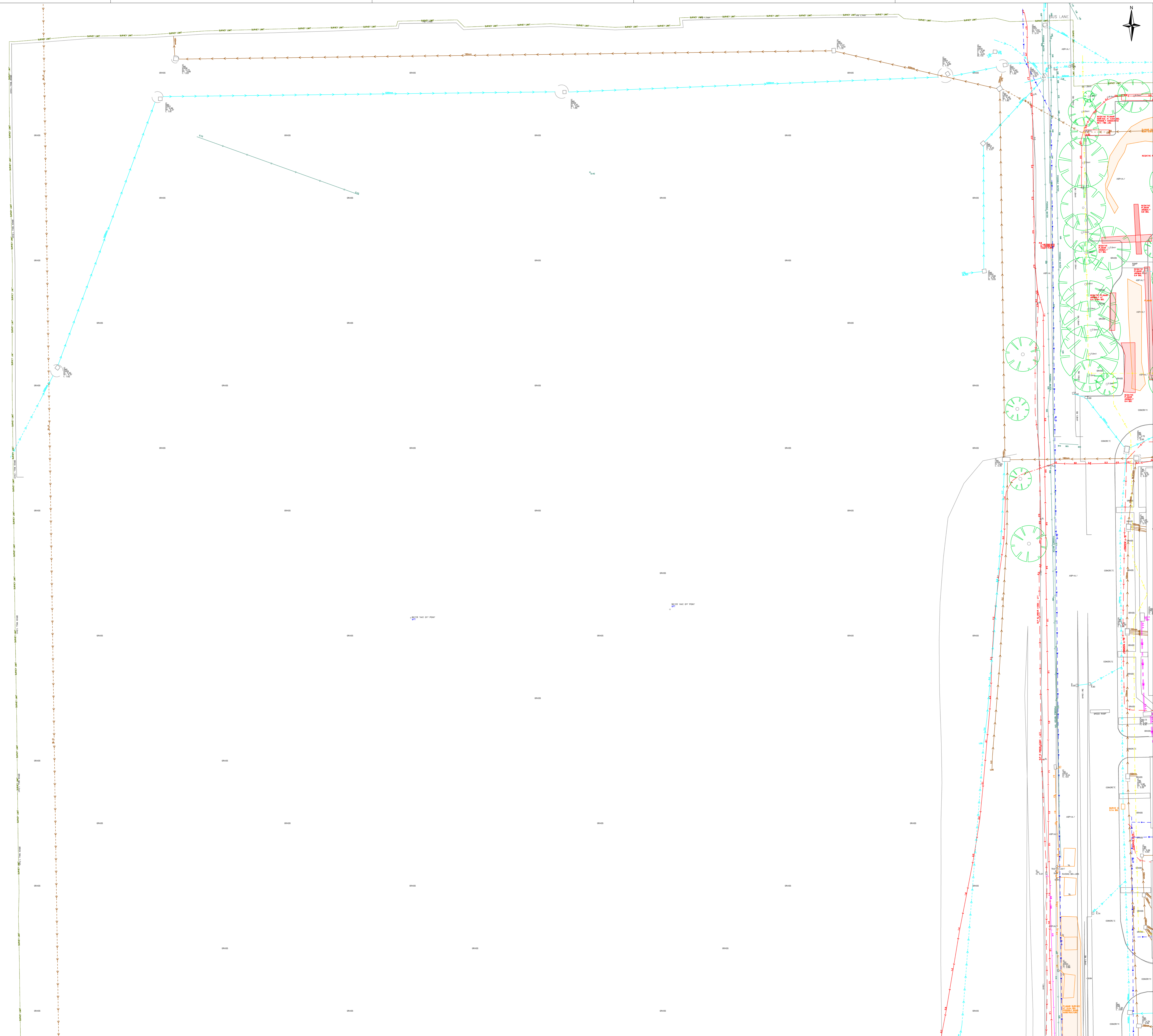
Underground Infrastructure Mapping

University of
Sunderland

Scale
1:500



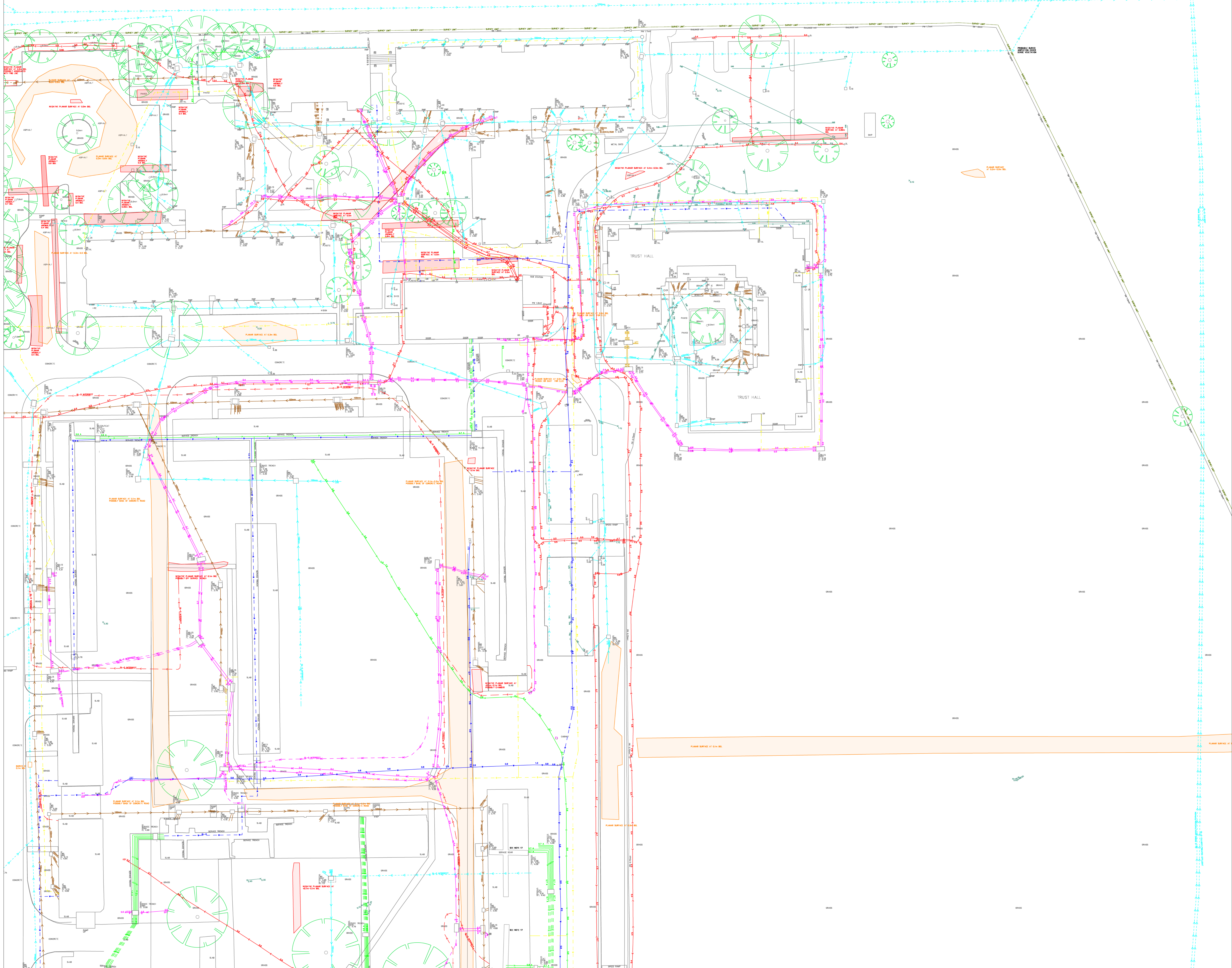
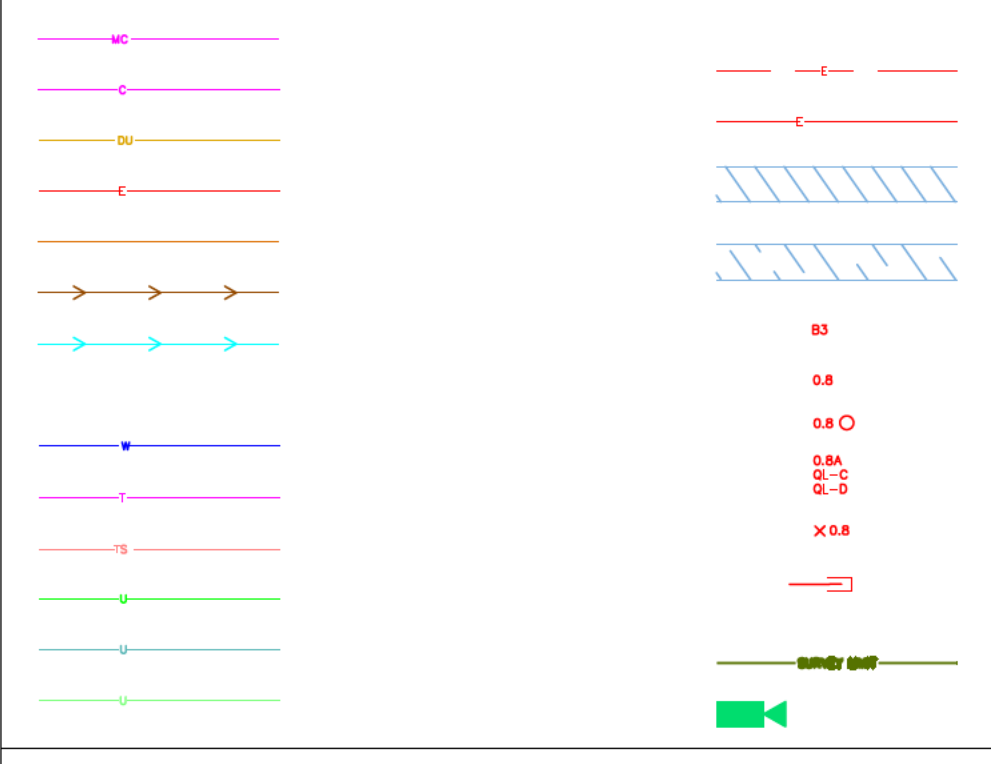
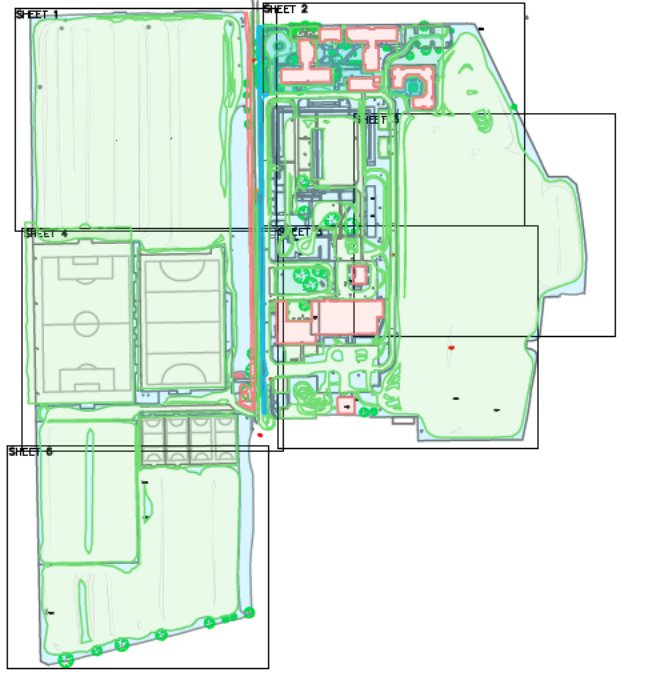
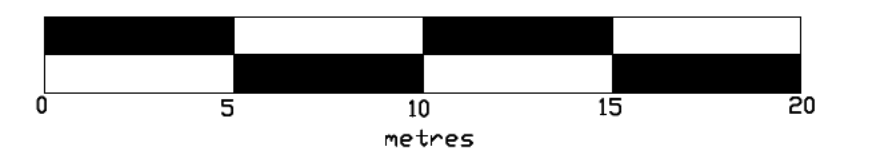
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Underground Infrastructure Mapping

University of
Sunderland



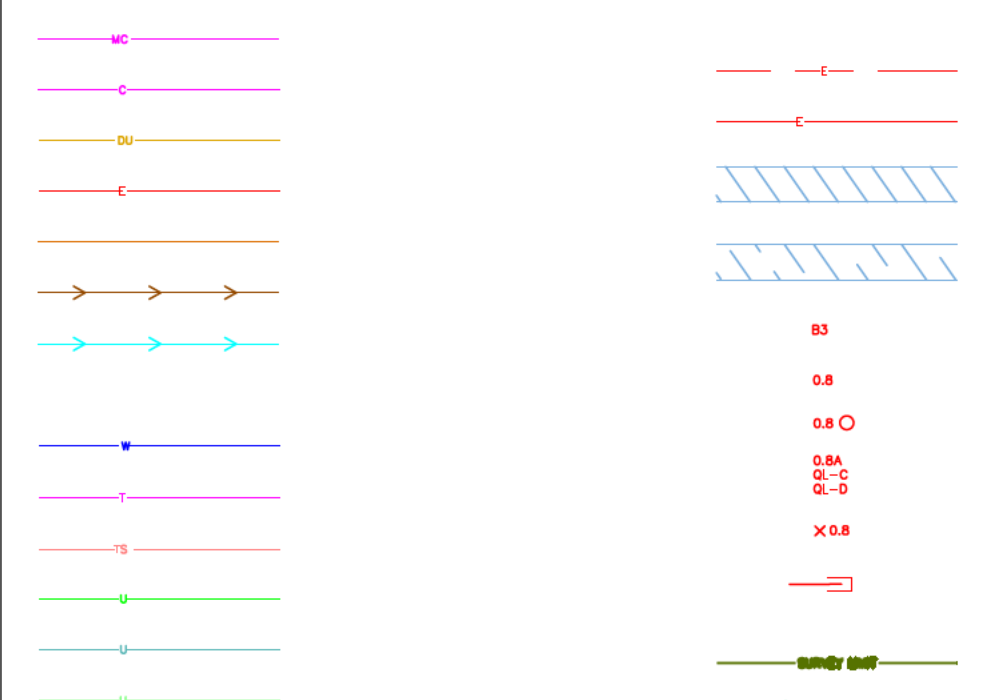
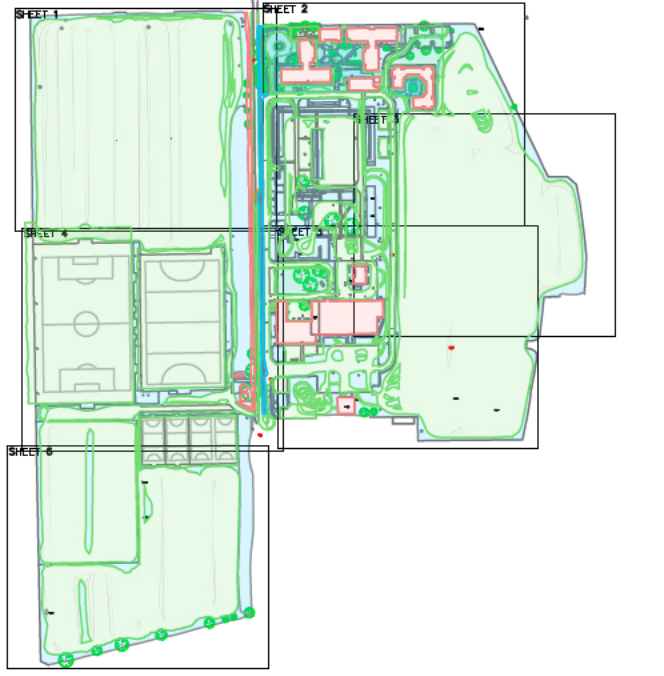
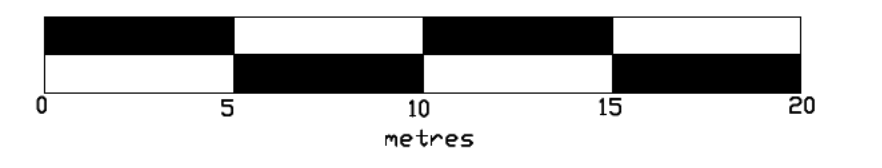


LandScope
Engineering Ltd

Underground Infrastructure Mapping

University of
Surrey

Scale: 1:1000



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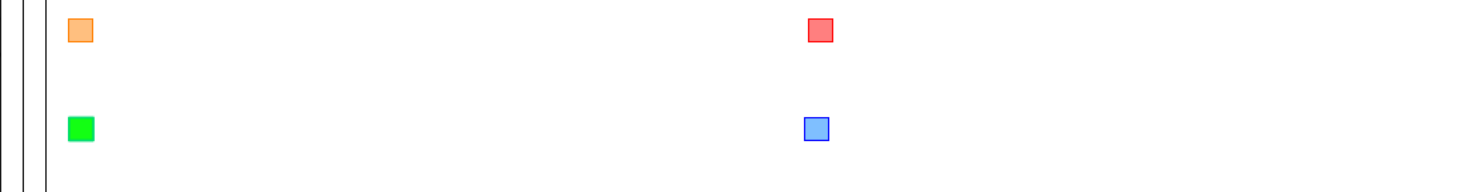
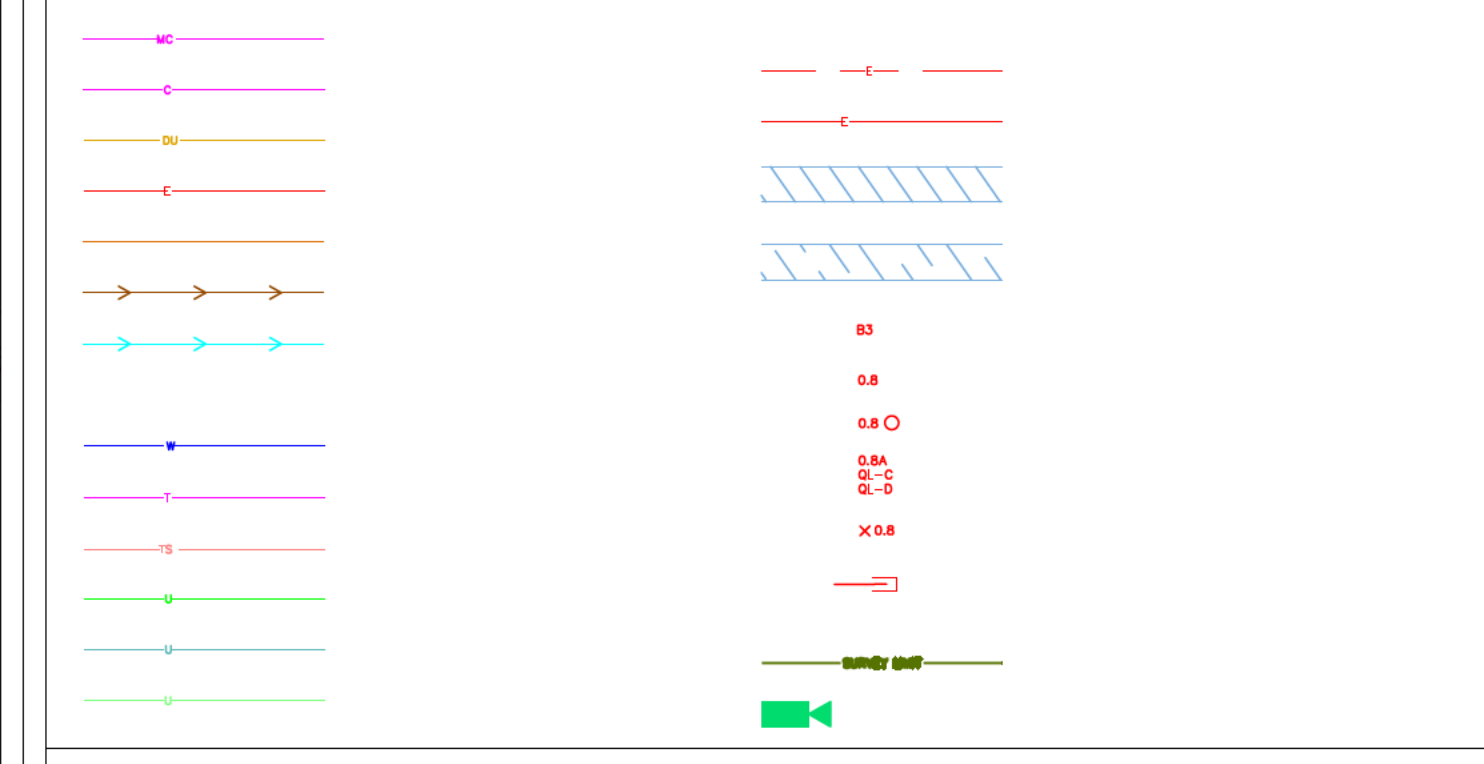
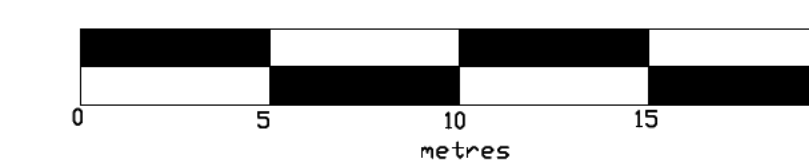
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Underground Infrastructure Mapping

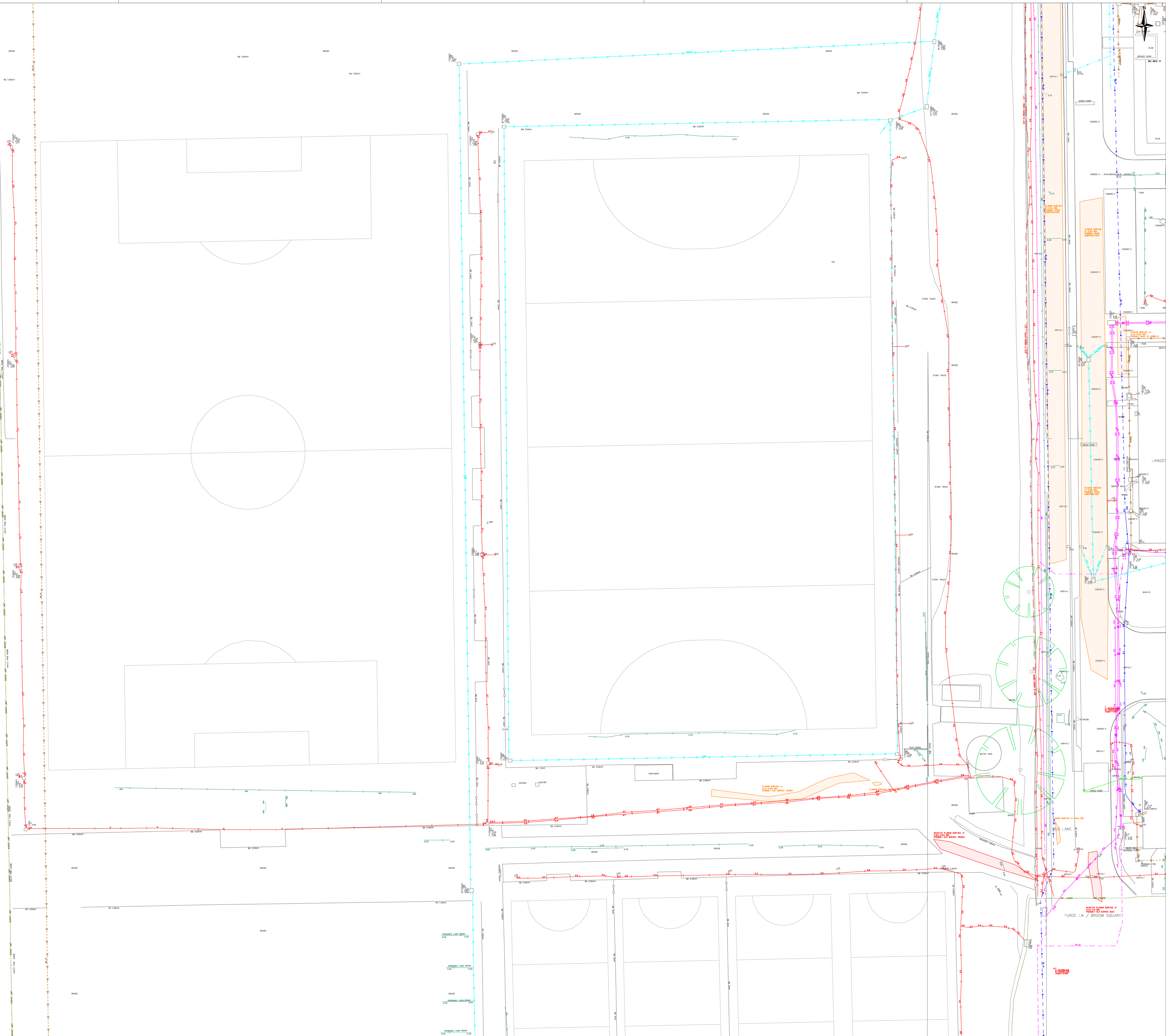
Utility Property

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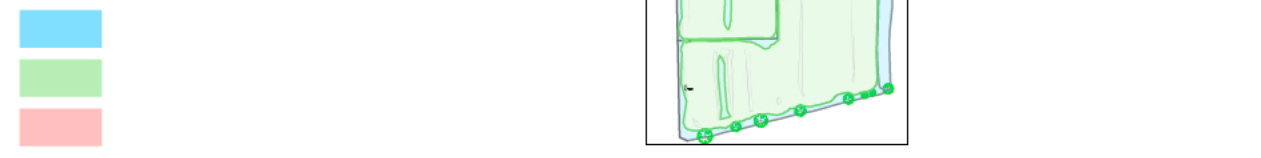
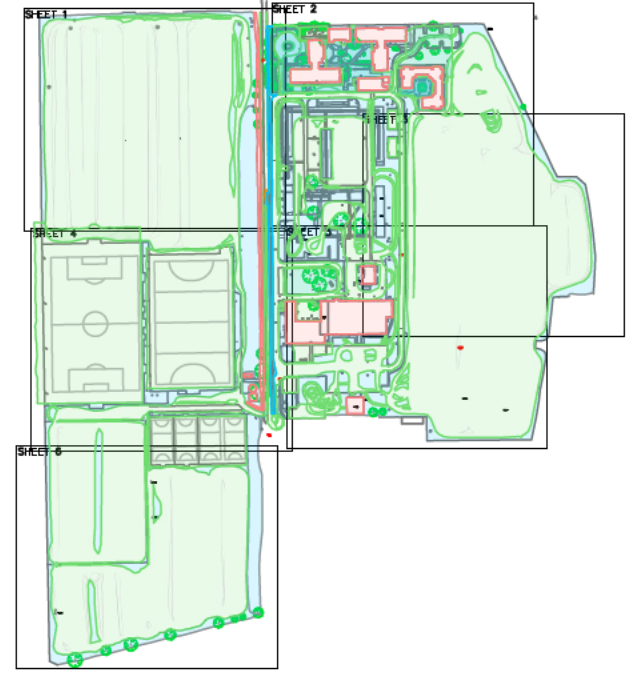
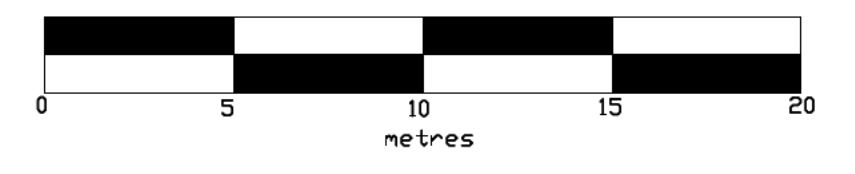
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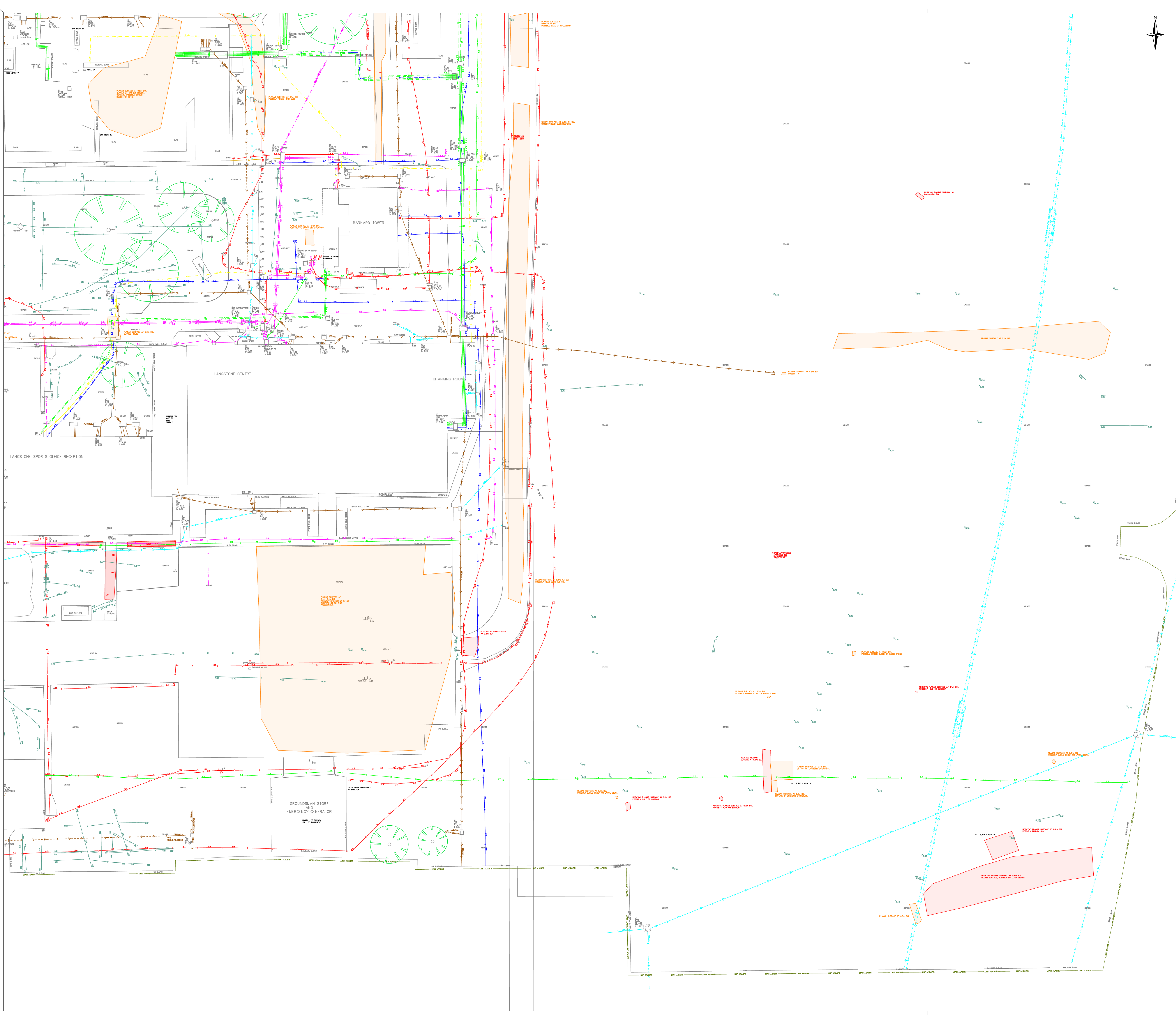




Underground Infrastructure Mapping

Geographical Position
S 00 0



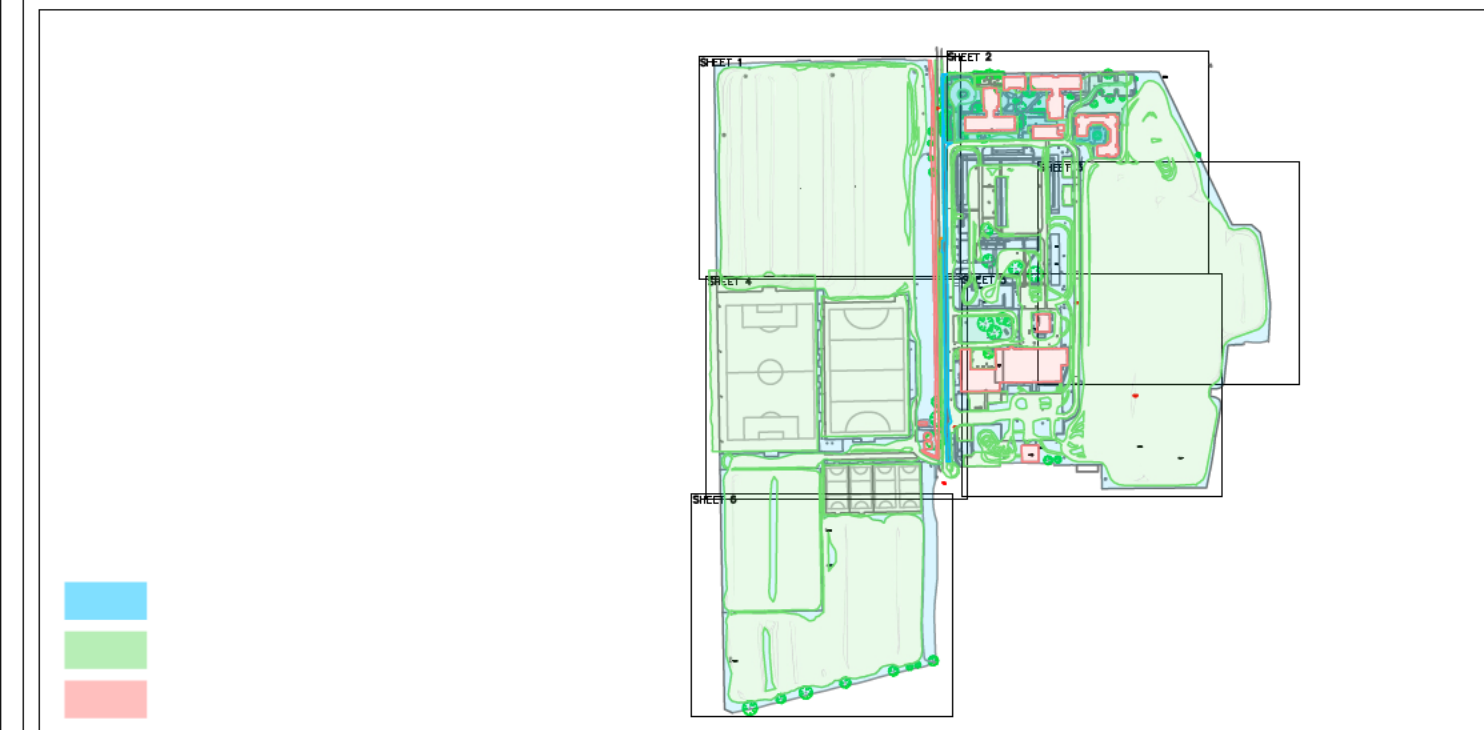
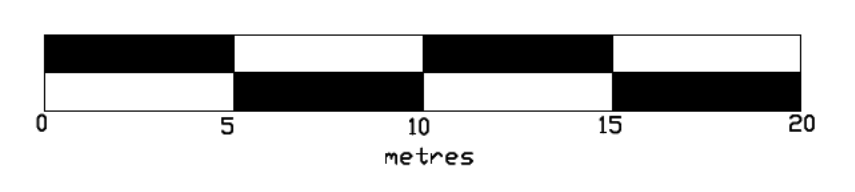


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Underground Infrastructure Mapping

Utility Plan

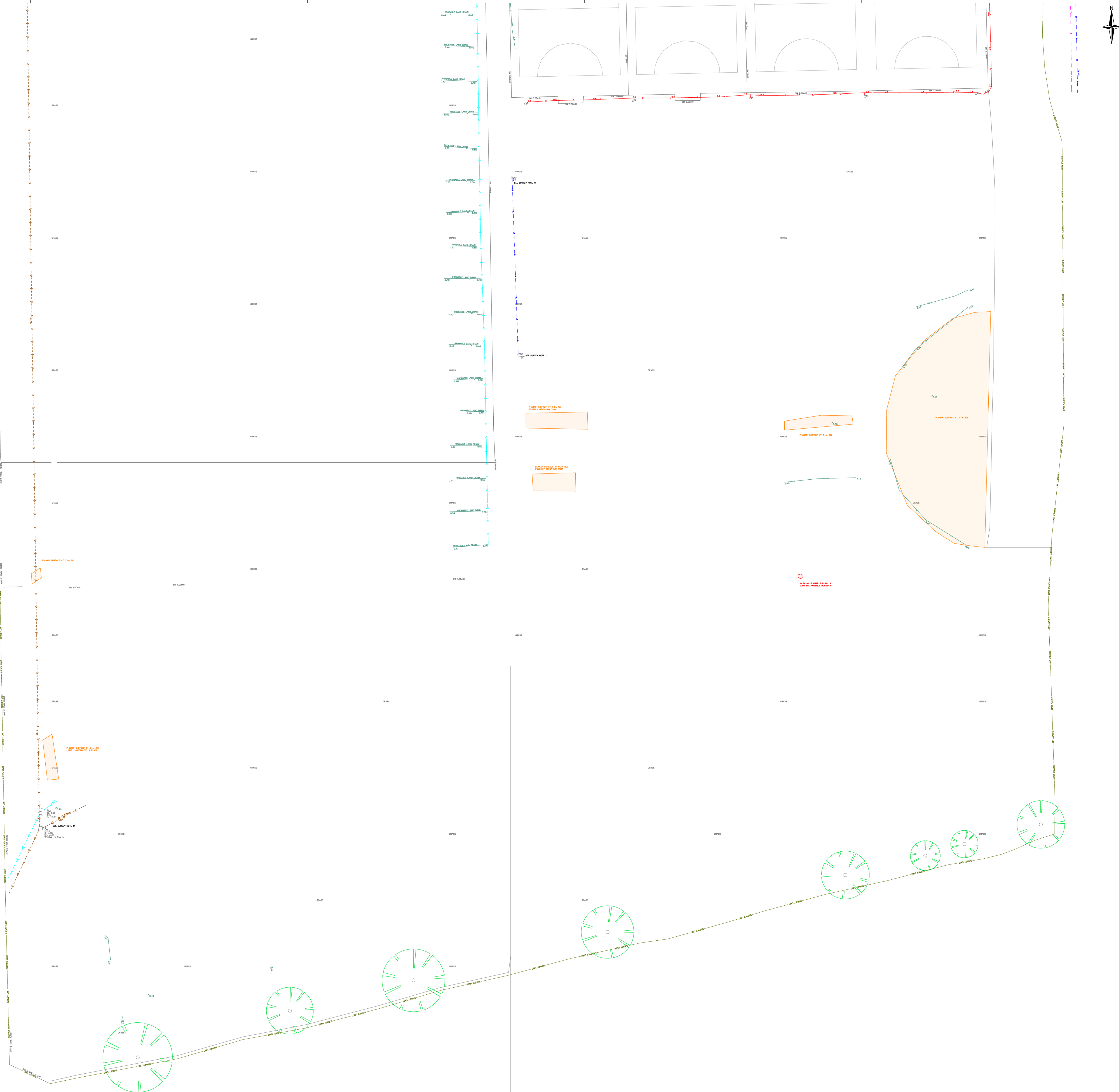
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Portsmouth University

DRAFT Landscape Maintenance Tender Schedule May 2019

ASA-573-SP-904 D3

Section 3 - Part 2 Sports Field Landscape Maintenance Specification

The following schedule should be priced to include all areas indicated the Site Keyplan and Layouts ASA-573-DR-001 - 005 inclusive.

All general landscape maintenance at Langstone to be carried out in accordance with the general landscape specification.

Description	Associated maintenance items	Spec ref. Code / Guidance	Minimum Frequency per annum	Total per annum (£)
General	Allow for compliance with Preliminaries and Conditions of Contract			
Sports Pitch Regular Operations	Selective herbicide application to all grass sports areas	1015	1	
	Fertiliser Application - April and October	1016	2	
	Aeration - October to March	1017	6	
	Harrow - March & April	1018	4	
	Scarifying	1019	1	
	Verti- draining	1020	2	
	General Operations	1035, 1040, 1050	As required	
Grass Pitches	Weekly inspection through playing season		32	
	Twice Weekly Grass Cutting of Pitches	1010, 1011, 1012, 1013	64	
Grass Pitches	Weekly inspection through playing season		32	
	Weekly Grass Cutting of Pitches through playng season	1010, 1014	32	
3G Pitch	Maintain pitch as per manufacturers requirements	See Appendix		
	Weekly rubber crumb, Top up of isolated thin areas in high use areas with rubber crumb as supplied by the University		52	
	Monthly drag mat artificial grass surface		As required	
Synthetic Turf Pitch	Maintain pitch as per manufacturers requirements	See Appendix		
	Weekly sand level measure, drag brush artificial surface, Top up of isolated thin areas in high use areas with sand as supplied by the University		52	
	Weed and moss treatment as required		As required	
Multi Use Games Area	Maintain pitch including leaf removal, weed / moss removal and annual pressure washing	1070	As required	
Pitch Leaf Clearance	All pitches		As required	
Irrigation	Water application to ensure healthy sward on all sports pitches at all times	1021	As required	
	Supply of 5 sprinklers	1022		
	Operation of sprinklers daily Monday to Friday inc tank top up	1022	As required	
End of Season Pitch Renovation - Pitches E1, E2, E3, W1, W2, W3, W4, W5	Renovate pitches following winter sports season	1025	1	
	Apply screened topsoil, topdressing and grass seed	1004, 1006	1	
Bird (Geese) excrement removal	Allow for monthly sweeps		12	
Line marking	Line marking on all sports pitches throughout playing seasons.	1030, 1031, 1040, 1050, 1052, 1054	As required	
Summer Line Marking	Line marking on Langfield Campus	1085		
General Sweeping	Vigorous Monthly sweep of tarmac surrounds to pitches		12	
Leaf and Litter Clearance	Weekly leaf and litter clearance - all surfaces		52	
Total Carried to Form of Tender				

Meeting Note

Purpose of Meeting:	Aquind Interconnector - University of Portsmouth
Location of Meeting:	Teams
Date:	20 November 2020

Details:		
Attendees present - University of Portsmouth		
██████████ - Director of Estates and Campus Services	■	University of Portsmouth
██████████ - Partner, Freeths	■	Freeths
██████████ Principal Associate, Eversheds	■	Eversheds
Attendees present - Aquind		
██████████ - Project Engineer	■	Aquind Ltd
██████████ - Senior Associate, HSF	■	HSF
██████████ - Technical Director, WSP	■	WSP
██████████ - Senior Associate, HSF	■	HSF
██████████ - Director, Avison Young	■	Avison Young

This meeting was organised by the Aquind team to provide feedback to the University of Portsmouth on a number of queries they raised in relation to Aquind's application for Development Consent. The queries are set out below along with the answers provided and links to relevant project documents.

1. Why the land is required given the north and south onshore cable options? Further clarification was sought from the University on this query and the University clarified this query relates to why Aquind cables are being installed onshore rather than via Langstone Harbour.

The justification for the cable route not being routed via Langstone Harbour is dealt with in significant detail at section 6 of the Supplementary Alternatives Chapter available at the link below.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-001488-7.8.1.3%20ES%20Addendum%20-%20Appendix%203%20Supplementary%20Alternatives%20Chapter.pdf>

■ queried the cable route crossing at Langstone Harbour in Section 8. ■ clarified it is being installed using Horizontal Directional Drilling (HDD) and will be at significant depth below the surface.

■ provided an overview of the cable installation techniques, being open trenching and HDD. ■ queried why open trenching is being proposed at the University rather than HDD. ■ summarised that HDD is generally used where open trenching cannot be used and using HDD at the University would likely have more significant impacts than an approach using open trenching as two large construction compounds would be needed and the programme would need to be extended.

2. Programming of Works and Timing.

The programme will be largely informed by the Solent Waders and Brent Geese Strategy sites restrictions. Paragraph 6.2.1.2 of the Onshore Outline Construction Environmental Management Plan (available at the link below) states 'Construction works cannot take place in SWBGS (those categorised as either core, primary support, secondary support, low use or candidate) sites that overlap with the Proposed Developments Order Limits during October – March'. As such works are limited to the period from April to September.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-002858-6.9%20Onshore%20Outline%20Construction%20Environmental%20Management%20Plan%20Rev003%20clean.pdf>

A procurement exercise is currently taking place in tandem with the DCO process to appoint an EPC Contract to construct the project and further programme refinement will take place when they are appointed.

It has been assumed the works would take a maximum of 8 weeks for installation and a further 8 weeks for reinstatement. The 8 weeks installation assumption is conservative as the anticipated rate of installation is 50m per day and each circuit will have a length of approximately 325m, giving a total length of 650m. It is possible that the installation would take less than the 8 weeks proposed which would provide for a longer reinstatement period.

■ queried the level of reinstatement given the pitches are accredited. As a post meeting update, ■ has confirmed the accreditation related to the 3G pitches and not the grass pitches.

■ stated that ongoing engagement is taking place with Sports England. It is possible that the reinstatement would be undertaken by re-turfing the areas which is likely to accelerate the reinstatement timescales.

■ reiterated the point made in the University of Portsmouth Written Representation that the University of Portsmouth facilities have been identified to operate as a Euro 2022 Women's Football Championship training site during summer 2022. It is not yet known whether this will include the rugby pitch and football pitch affected by the Order Limits.

3. Extent of Works required on the Langstone Playing Fields and relationship with the Rights Land.

■ summarised the works as being the installation of two circuits each comprising two HVDC transmission cables and a fibre optic cables over a distance of approximately 325m with the potential

that a pair of joint bay would also be required in the south-east corner of the University land. The dimensions for the joint bays, which once installed are buried underground with the surface reinstated above, are up to 6 metres in length by 3 metres in width and 1.85 metres in depth. Aquind's preference in this area is to install the Onshore HVDC Cables as far east as possible to minimise the impacts on the University's playing pitches. The wider area within the Order limits has been retained to reflect that surveys will need to be undertaken to confirm the suitability of an 'eastern route' (i.e. that there are no below ground structures or impediments which would obstruct the installation of the cables in the eastern verge) noting that permission was not provided by the University for surveys back in 2018 when previously requested.

The rights required are set out in the Book of Reference (see Plot 9-26) available at the link below.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-002886-4.3%20Book%20of%20Reference%20-%20Clean%20Rev003.pdf>

4. Loss of playing pitch capacity during the works.

The Environmental Statement Addendum – Appendix 13 Framework Management Plan for Recreational Impacts available at the link below provides information in relation to loss of playing pitches.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-002880-7.8.1.13%20ES%20Addendum%20-%20Appendix%2013%20FMP%20for%20Recreational%20Impacts%20Rev002.pdf>

Paragraph 4.1.2.4 states – 'Options for pitch or open space reinstatement will be discussed with the Contractor PCC, and the University of Portsmouth before commencement of construction. Proposals will be submitted by the Contractor for the returning to service of any pitches that would be affected, including method and programme. All pitch reinstatement will be carried out in accordance with the Sport England Design Guidance Note 'Natural Turf for Sport (Updated guidance for 2011)', with reinstatement work on pitches undertaken by a specialist agronomist or sports turf contractor to ensure that the relevant pitch is reinstated to an equivalent quality to that which has been temporarily lost or affected'.

There is scope to move the southern pitch further west which would provide sufficient space for the cable route to be installed at its eastern edge. The cable route could pass to the east of the 5 a side pitch which would be unaffected. The middle pitch could be moved further west and temporarily shortened whilst works and reinstatement are taking place. These mitigation measures would be subject to the option to install the cables in the eastern verge of the pitch being technically feasible.

5. Proposed mitigation for loss of pitch capacity and recreational activity during works and restoration.

US asked whether there is any further mitigation that can be provided, for example, marking out a new football pitch area the west of the area in which the cable route could potentially be installed at the eastern verge of the University's land. Discussion with Portsmouth City Council has confirmed that there is no additional pitch capacity that can be used elsewhere.

University of Portsmouth stated that there was no other mitigation that could be applied.

6. Period of pitch restoration activity.

US explained it is accepted that a number of factors can affect restoration, including land drainage and climate.

The proposed cable route illustrated in the Framework Management Plan for Recreational Impacts has been designed so that excavation works avoid the playing pitch surfaces. Detailed design will consider the location of any drains and position of temporary works like laydown and storage areas, in addition to protection of the underlying surface, for example use of matting to avoid compaction. This can also help minimise the restoration period.

7. Pitch restoration methodology and allowance for planting season constraints.

The Contractor would take advice from a specialist agronomist in relation to restoration methods and it was accepted that climatic factors would affect restoration.

The University would like assurance that Joint Bays would not be placed in the pitches. █████ explained that would be contrary to the interests of both parties and the most likely location for a Joint Bay would be at the south eastern corner of the University fields.

8. Future maintenance required (areas and easements) for the rights land and impact on future development of the site.

Scheduled maintenance would consist of a walk over to ensure that no activities are taking place which have the potential to impact the cables (e.g. excavations, piling etc). In the event a joint bay is installed at the south east corner of the pitches it is possible a link box would be installed adjacent to it. Access to this would be required periodically for maintenance/monitoring purposes.

Unscheduled maintenance would be undertaken in the event of a cable fault and would result in the length of cable in which the fault was present being pulled out at one of the joint bays either side of it and being replaced. Whilst this would require work to take place at the joint bay, the sports pitches would not be affected after cable installation.

9. Impact on high voltage cable environment and the IMS Eastney link.

No impact on the IMS link is anticipated as the cables will be shielded. The Environmental Statement – Volume 3 – Appendix 3.7 Onshore Electric and Magnetic Field Report, available at the link below, provides further information on this.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN020022/EN020022-000814-6.3.3.7%20ES%20-%20Vol%203%20-%20Appendix%203.7%20Onshore%20Electric%20and%20Magnetic%20Field%20Report.pdf>

10. Feasibility of the cable route alternative proposed in the Written Representation.

Given the option via Furze Lane has been removed, Aquind's preference is to install the cable route in the eastern verge of the University's pitches.

11. Highway impact of construction activity

The information in relation to highways impacts is provided in the Framework Construction Traffic Management Plan and Framework Traffic Management Strategy. Access to the site would be taken via Locksway Road and Longshore Way.

Environmental Statement – Volume 3 – Appendix 22.2 Framework Construction Traffic Management Plan https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001569-6.3.22.2%20ES%20-%20Vol%203%20-%20Framework%20Construction%20Traffic%20Management%20Plan%20Rev002_clean.pdf

Section 5.3.10.2 states “The route through Milton Common or the University of Portsmouth playing fields to Longshore Way requires access from Moorings Way where it meets Sanderling Road and Furze Lane and from Longshore Way. This is shown as points AC/9/c, AC/9/e and AC/10/a on the AROW Plans (Examination Library Reference: APP-011Rev 02).”

Environmental Statement – Appendix 22.1A Framework Traffic Management Strategy https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001567-6.3.22.1A%20ES%20-%20Vol%203%20-%20Framework%20Traffic%20Management%20Strategy%20Rev002_clean.pdf

The Access and Rights of Way Plans are available at the link below and show that access via the existing access to the pitch from Longshore Way will be required. It is possible this would need to be widened while works are taking place.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001514-2.5%20Access%20and%20Rights%20of%20Way%20Plans%20Rev02.pdf>

The Access and Rights of Way Explanatory Document provides further information and is available at the link below. Table 9 at section 10.1.1.3 states ‘New temporary access requiring removal of existing fence, provision of vehicle crossover and new kerb to form a gated access’ will be required for ‘Access for construction of the Onshore Cable Corridor’.

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020022/EN020022-001599-7.4.1.6%20Appendix%206%20Access%20and%20Right%20of%20Way%20Explanatory%20Document%20WQ%20DCO1.5.68.pdf>

█ raised a point in relation to the fence and gate being security features. █ stated that there is no reason why security cannot be appropriately managed during installation and the Contractor will be responsible for ensuring the security aspects across the cable route during construction.

Other business.

█ mentioned that the University is looking at the potential to carry out a land use swap which could result in land within the SWBGS protected area being made available for development. █ stated there are no issues with this and is outside the project's considerations but no construction activity would be able to take place above the cable route.