

From: [REDACTED]
To: [Aquind Interconnector](#)
Subject: AQUIND Interconnector
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Dear Sirs,

Sport England wishes to make further representations concerning the impacts of the development on playing field sites within the city of Portsmouth.

Sport England has had significant engagement with the agent/applicant prior to and during the examination process on the Framework Management Plan (FMP) which we understand is appended to the Environmental Statement. This sets out the applicant's assessment of impacts on playing field land and the approach to minimising and mitigating those impacts. We have been able to sign-up to a statement of common ground on some matters. However, a number of matters and issues remain outstanding on which we have not been able to reach agreement and we consider it helpful for the examination to raise them at this stage.

Impact on playing field

The proposal affects 4 playing field sites to which we have confined our comments. These are in no particular order:

- Farlington Playing Fields
- University of Portsmouth/Langstone Sports Ground
- Baffins Milton Rovers Football Ground/Langstone Harbour Sports Ground
- Bransbury Park

We wish to maintain concerns about the wide ranging nature of the Order limits across the Farlington Playing Fields site, where the indicative route and associated works represents a 'best case scenario' in terms of minimising the impact on playing pitches. The Order limits would permit an alternative route which could impact on a greater number of playing pitches. Of all the playing field sites affected, Farlington Playing Fields is the most strategically important site for community sport with a large number of grass football pitches as well as multiple cricket pitches accommodating a large amount of play across the year. Our view is that these Order limits should be narrowed so as to minimise the likely impact on this site.

Sport England has raised through discussions with the agent/applicant the need for a specialist assessment of the ground conditions at the sites by a suitably qualified agronomist to inform the process for the reinstatement of the playing field turf following works to ensure that the pitches can be returned to sporting use efficiently without affecting their quality in the long term.

Sport England therefore welcomes the agent/applicant's use of 'PSD agronomy' as a technical contractor to undertake some initial assessment of the playing field sites to inform the approach to minimising and mitigating the impact of development on the site. Sport England has reviewed these details with some technical support from the Sports Turf Research Institute (STRI). Our consideration is that while it is theoretically possible that the proposed approach to reinstatement within the timeframes outlined is feasible and achievable, it is considered that the approach will need careful planning; preparation; implementation; management and maintenance. Furthermore, that the proposed approach raises a number of questions; issues which will need careful consideration and where more detail is required. On that basis, Sport England has not been able to agree or sign-off on the scheme for reinstating the playing field. Sport England has identified below, in Appendix 1, the key technical issues/matters which need further consideration or detail.

Alternative playing arrangements

The Framework Management Plan identifies that the indicative phasing of works shows there will be significant periods of the playing season, over 3 seasons for both winter (football) and

summer sports (cricket), where some of the pitches will be out of action and unavailable for use due to either works taking place and/or the turf recovering from reinstatement.

Sport England maintains concerns that as it currently stands there is no strategy for meeting the training or matchplay needs of teams/clubs using the playing field sites affected during the playing season. No specific alternative playing arrangements have been identified. The Framework Management Plan notes that the agent will work with Portsmouth City Council to source suitable alternative arrangements. However, Sport England is concerned that the Playing Pitch Strategy for Portsmouth City Council which was produced a few years ago identifies existing capacity issues within the city's stock of playing pitches. Sport England is concerned therefore that there is a lack of capacity within Portsmouth's stock of playing pitches to accommodate displaced training or matches from the playing field sites affected by the development. This issue is most relevant at Farlington Playing Fields where there will be significant disruption to the football season across three seasons and Baffins Milton Rovers Football Ground/Langstone Harbour Sports Ground where there will be disruption to the cricket season. There is community use of the cricket pitch at this site, and given that a significant proportion of the season will be lost as a result of works on the site, an alternative cricket pitch for use during this period will need to be sourced.

In light of this, Sport England considers that consideration needs to be given to investment in new sports facilities or improving existing facilities to be able to accommodate the displaced training and matchplay that will result over an extended temporary period. This should be linked to the actions and recommendations identified in the Playing Pitch Strategy for Portsmouth and/or the Local Football Facility Plan which identifies key priorities for football facilities development in the city.

Sport England further notes that although the Framework Management Plan indicates that the University of Portsmouth/Langstone Sports Ground site is not used by community clubs/groups, our understanding, having consulted with the Rugby Football Union (RFU), is that the rugby pitch is used by Southsea Nomads Rugby Club who do also train/play at the university on a pay per play basis. While the works on this particular site are scheduled to take place over the summer months and should avoid the rugby season, consideration will need to be given to alternative playing arrangements should the timings change or the works overrun into the rugby playing season.

Conclusion

In conclusion, while there has been some progress in minimising and addressing some of the impacts from the development on playing field sites and community sport, a number of matters remain outstanding which require further consideration and work on the part of the applicant/agent. On that basis, Sport England are unable to support the proposal as it stands.

Appendix 1

A summary of the key issues for further consideration and where more detail is needed on the reinstatement of playing field.

1. Soil management processes/Trenching and backfilling

- Methodology for:
 - removal of topsoil; target depths of topsoil to be provided; amelioration of existing topsoil if deemed appropriate;
 - dealing with existing grass cover/organic matter (thatch) within trench line (prior to trench excavation);
 - backfilling trenches to ensure adequate and uniform consolidation, as set out, with maintenance of comparable infiltration/drainage rates to undisturbed ground (with supporting methodology/testing to achieve/confirm this);

Details of soil handling processes and topsoil storage.

2. Ground reinstatement/levels

- With risk of settlement over the trench lines, mitigation measures and method statements for surface levelling post reinstatement;
- Surface level information required pre and post construction for comparison;
- Improved blending of trench lines with established pitch areas- e.g. over seeding measures.

3. Drainage

- Validation of (temporary) drainage measures - notably function of temporary soakaways;
- Monitoring and recording procedures for disturbed/damaged drainage (Farlington Playing Fields benefits from a drainage system);
- Secondary drainage (Farlington playing fields) to be installed after the 1st season of pitch usage. Options for mitigating poor surface drainage and performance over this period. Also risks and mitigation measures for slit drain settlement to be set out post installation;
- Methods for keeping excavations free from water (ground or surface) to be provided in specified works;
- Validation survey of reinstated drainage (scope/ methodology)

4. Post construction maintenance

- Detailed program of post reinstatement maintenance.

5. Irrigation

- Methodology/ infrastructure and equipment to provide adequate irrigation over establishment period.

6. Confirmation of final easements/haul routes and compound location/extent

- The above information is required to fully assess the impacts on the playing field areas/cricket pitch and square (notably in relation to Farlington).
- Temporary works in relation to provision of compound areas will inform reinstatement requirements.
- For haul routes, ground protection measures are mentioned. Materials and methods are to be confirmed – which are compatible with machinery to be used and the receiving ground conditions. Measures for reinstatement of superficial or more significant damage are to be set out with the specified works.

7. Protection of works during construction and establishment

- Details of methods/materials and reinstatement post removal

8. PQS post establishment

- A full suite of PQS (Performance Quality Standards) is required prior to pitch usage, to ensure standards are met which are at least comparable to the existing playing field area.

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