

From: [REDACTED]
To: [Aquinid Interconnector](#)
Subject: AQUIND INTERCONNECTOR - Applicant's Response to Secretary of State Request for Further Information
Date: 12 August 2021 12:31:27

MITIGATION AND FINANCIAL CONTRIBUTION PROPOSALS FOR SPORTS GROUNDS, PLAYING PITCHES AND RECREATIONAL FACILITIES

Dear Sirs,

Sport England notes that the SoS has invited further comments on the applicant's response to the SoS's request for further information on the mitigation and financial contribution proposals for sports grounds, playing pitches and recreational facilities. Specifically, the SoS requested further information regarding:

- Details explaining clearly how the proposed financial contribution of £100,000 has been calculated by the Applicant; and
- Details of how the proposed financial contribution would sufficiently compensate for impacts on the affected facilities;
- A description of the compensatory strategies proposed, accompanied by an explanation of how they will effectively compensate for any effects of AQUIND Interconnector; and
- An implementation timetable for when the compensation measures will be delivered.

Sport England has reviewed the further information provided by the applicant in respect of the above and we have sought additional comments on this information from the relevant national governing bodies for sport affected by the proposed development, namely the FA/Football Foundation; the RFU (rugby) and the ECB (cricket).

Sport England wishes to maintain concerns about the proposed approach. Sport England would have expected to have had involvement in discussions concerning the proposed financial contribution of £100,000 designed to mitigate the impacts. I can confirm that Sport England has had no input into the considerations underlying this figure of £100,000. Sport England has a range of design and cost guidance for building and maintaining a variety of sports facilities which may have been helpful in this regard. To put into context, £100,000 is broadly the costs incurred in constructing a new adult full size (11x11) grass football pitch. It's not clear what the £100,000 would be used for.

In light of the further detail provided by the applicant, it is still not clear how this contribution of £100,000 has been reached. We would have expected a more detailed breakdown of this figure. Sport England would consider that more detail should be provided to understand the assumptions and/or costs that lie behind this figure as it is not considered clear. Furthermore, Sport England has previously and continues to advocate for investment in new sports facilities and/or improvements to existing sports facilities as a way of mitigation, in particular, in new Artificial Grass Pitch (AGP) provision for which a pressing need has been identified in the Playing Pitch Strategy.

Sport England has received the following comments from the national governing bodies for sport.

The FA/Football Foundation comments that the length of the football playing seasons have been underestimated at 30 weeks. This should be increased to at least 40 weeks as the football season will start for pre-season in Mid-August and conclude at the end of May. This allows for cup games and any weather related cancellations to be re-scheduled. Consequently, the impact from the proposed works on football may have been underestimated, noting that considerations should not just be limited to actual match fixtures but also to training including pre-season training.

The Foundation goes on to comment that there is considered to be very limited capacity to re-provide. If staggered kick offs are being proposed, then the quality of the pitches are not suitable to support this, especially in the wetter months. There has been a growth in the demand over past seasons and PCC report that there are more teams wishing to book pitches which only compounds the issue of losing pitches.

The Football Foundation would wish to see further mitigation agreed and serious consideration given to supporting the construction of artificial 3G pitches at a separate site that can help to provide the required capacity that staggered kick offs can give and to also leave a long lasting legacy that the City of Portsmouth can make use of long beyond the completion of the Aquind works. The FF and the Hampshire FA with PCC have a clear project that is progressing and is well timed to provide support during the obvious displacement of the Aquind build.

In relation to cricket, the ECB and Hants Cricket Board comments that in order for cricket to be played, full use of the outfield plus 2.73m run/off area beyond the boundary as well as the square is needed. It should be noted that while the applicant maintains that only cricket pitch no.3 is affected, the outfield of cricket pitch no. 2 is also within the order limits and theoretically could be impacted by the proposed development. Taking the outfield or even part of the outfield out of use will prejudice the ability to use this cricket square. So, the potential impact on cricket has been underestimated.

The ECB/HCB would contend that the estimated recovery time of 4-5 weeks where cut-roll turf is used for reinstatement is still somewhat of a best case scenario and could be closer to 7 weeks with potential further impact on cricket.

Further, the ECB/HCB would be concerned about an approach which would see cricket matches moved from Langstone Harbour Sports Ground to Farlington Playing Fields. The applicant contends that through fixture rescheduling/ staggering match times that additional matches can be accommodated at Farlington. However, there are issues with this given the length of time cricket matches take. Such an approach would also need agreement from the relevant cricket leagues. Midweek matches (which are shorter in duration) cannot be moved to the weekend and equally weekend matches (which are longer) cannot be switched to a weekday (evening). Further, there is no consideration on the impact of playing more matches on the existing pitches and this could take them beyond their carrying capacity.

The RFU wishes to reiterate, as highlighted in Sport England's response dated 4th March 2021, that Southsea Nomads Rugby Club 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.

Sport England's further comments

Sport England considers that insufficient consideration has been given to how any proposed fixture re-scheduling /staggered match times might work. We're unaware of engagement with the leagues and clubs and whether this is practicably workable, which is considered questionable. It doesn't give sufficient consideration to the existing usage of the pitches. The extent to which these pitches are already used and played on limits their capacity to absorb additional match fixtures and training without compromising the quality of those pitches, especially during the winter months. As previously highlighted, the main concerns with the proposed approach is that relocating or rescheduling additional fixtures or training onto other unaffected pitches is their ability to absorb this additional usage. The existing pitches are well-used and are considered to be generally played to capacity or above capacity. Additional usage will only have a detrimental impact on their quality. Sport England would have expected the applicant to have done more analysis of the sites to assess the demand and supply position in order to demonstrate that their approach was feasible and did not compromise the quality of pitch stock.

Further, there doesn't seem to be an understanding of how cricket is played within the city; the nature of different types of cricket: shorter matches during the week with longer forms of the game at weekends and therefore the constraints this presents in terms of rescheduling.

Sport England argues that investment in new facilities or enhancements to existing facilities should be explored in order to properly mitigate the impacts and the disruption that will be caused to community sport as a result of this proposal.

Best wishes,
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