

**From:** [REDACTED]  
**To:** [Aquind Interconnector](#)  
**Cc:** [REDACTED]  
**Subject:** PINS Ref: EN020022 / Application by AQUIND Limited: Written Representation on behalf of the University of Portsmouth  
**Date:** 12 August 2021 18:06:29  
**Attachments:** [image948403.png](#)  
[image160217.png](#)  
[image780268.png](#)  
[image524193.png](#)  
[UoP Response Statement 120821.pdf](#)

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Dear Sir / Madam,

In advance of the deadline to respond to the Applicants Statement in response to the Secretary of State for Business, Energy & Industrial Strategy request for further information, please find attached our Written Statement on behalf of the University of Portsmouth.

Kind regards

Dan

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## APPLICATION BY AQUIND LIMITED

### RESPONSE TO APPLICANT'S SUBMISSION RESPONDING TO THE SECRETARY OF STATE FOR BUSINESS, ENERGY & INDUSTRIAL STRATEGY

#### ON BEHALF OF THE UNIVERSITY OF PORTSMOUTH

12 AUGUST 2021

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#### Introduction

1. This Statement has been prepared on behalf of the University of Portsmouth ("the University") as a response to the statements that were submitted by the Applicant in response to the questions posed by the Secretary of State for Business, Energy & Industrial Strategy, published to the Planning Inspectorate's website on 28<sup>th</sup> July 2021. This response also provides an update as to position the University holds with regards to the application and the points raised in the response from the Applicant.

#### Response

2. We have reviewed the Applicant's response to the questions posed by the Secretary of State, and have taken close care and attention to the comments around the University's playing fields and the financial contributions that have been stated.
3. Throughout the statements that we have submitted on behalf of the University, we have detailed how the playing fields at Langstone Sports Ground are actually publicly accessible. All the pitches at the sports facility can be hired out to members of the public, sports teams, community groups and schools. It is clear from a quick look at the sports facilities website for the University that all their facilities are "open to everyone in the community, not only our students and staff". All of our previous Statements in relation to the use of Langstone Sports Ground has confirmed this point. Therefore, the statements made in paragraphs 2.9 & 2.76 of the Applicants response are inaccurate, and the University would contest that they should receive some of the financial contribution that has been prepared in relation to disruption to publicly available pitches. It would seem logical that given the financial contribution that is for disruption to publicly available pitches is also applied to the sports pitches that are available for public use at Langstone Sports Ground.
4. Paragraphs 2.76 – 2.82 explain the mitigation strategies in relation to the University Playing Fields at Langstone Sports Campus. The University agrees with the statement made at paragraph 2.77 insofar that a recreational management plan will be agreed between the University and the Applicant before any works are undertaken. It is of absolute paramount importance that the works are kept as far to the east of the playing pitches as possible in order to minimise the disruption of services and facilities that the University provides at the Site. Paragraph 8 of our Deadline 8 submission outlines the importance of the dimensions of the pitch and the concerns that space available following pitch realignment would not be sufficient for the purposes of using the rugby pitch.

5. In the event of the southern rugby pitch having to be realigned due to the works not being able to be kept as far to the east as possible (paragraph 2.78 of the Applicants response), the University do not believe that the southern rugby pitch can be realigned to the appropriate dimensions (as according to Harrod Sport and World Rugby (see paragraph 8 of our Deadline 8 statement)). As such, the University will expect disruption to the use of this pitch whilst the works are on-going. This will completely rule this pitch out of being able to be used by the University and by any members of the public / community groups / sports teams who may wish to hire the pitch for their own use.
6. Paragraph 2.79 continues to state that University land will be affected for up to 12 weeks, including works (4 weeks) and reinstatement of the pitch (8 weeks), although the latter may be able to be reduced if thick cut big roll turf is to be used. Which, as we stated in our Deadline 8 submission (see paragraph 9) the University has no objection to being used. However, there are no reassurances that this will actually shorten the reinstatement time as there are a number of variables that are also dependent on the time it takes for new turf to establish.
7. The Applicant's response at paragraph 2.81 states that the Applicant will be required to pay some compensation to the University as the owner of the playing fields, with respects to the disturbance and loss of income. At the time of writing this response statement, the University has had no contact with the Applicant to agree this compensatory figure.
8. As such, the University can only continue to object to the proposal until such a time that a suitable compensation figure has been agreed, and that it can be evidenced that all measures have been taken in order to minimise disturbances of the pitches to the east of the campus have been taken. Furthermore, it would be appropriate for the applicant to acknowledge that the pitches at the University Sports Campus are actually available to the public and are therefore publicly accessible for hire.

## **Conclusion**

9. As stated in our Deadline 8 submission, we recognise the progress made by the Applicant in addressing some of the University's concerns. However, the University has to maintain its objection to the current proposed Order based on the unmitigated impact demonstrated in the submissions particularly on the two rugby pitches and one 5-a-side football pitch and the potential realigned southern pitch being smaller than is recommended (see our Deadline 8 submission). This is underpinned by the uncertainty regarding the ability to achieve the mitigation proposed where the affected land is still retained within the Order and subject to the Applicant needing to undertaken further investigations and seek additional advice.
10. Furthermore, the Applicant appears to misunderstand the University's facility insofar that it is readily available to the public and it explicitly advertises that fact on their website. As such, it is not correct as the Applicant would suggest, that the University facilities are not available to the general public. The loss of the use of the playing pitches would therefore contribute to the overall loss of publicly available pitches in Portsmouth.
11. Finally, the mitigation and compensation that is referred to in the Applicant's response has yet to be agreed with the University, as such, the University is not satisfied that their concerns have been fully addressed. Any mitigation should be agreed and suitably secured.

12. We trust this explains the University's position and look forward to being notified of the decision in due course.

**Daniel Hyde**  
**Associate, Planning & Environment Group**  
**Freeths LLP**