

Comments on behalf of Havant Climate Alliance and Havant Friends of the Earth

We accept that any body of water will carry a drowning risk and that the most effective measures must be put in place to reduce that risk. This can be a matter of life or death. We have a number of concerns about the effectiveness of the control measures, so are Objecting.

1. At 1.2.2 there is reference to risk reduction using the principles of “Safety in Design” and at 3.2 “Hostile Architecture”. However the introduction of an offshore Valve Tower (and proposed Bridge) present the opposite of both these principles. The Risk Review does not take account of this. In our opinion the Valve Tower will increase the risk of drowning by acting as a lure to children and irresponsible adults wanting to swim out to it. A continuous railing around the top of the Tower, at 3.3.3, is unlikely to be a deterrent. A Bridge will also attract people wanting to dive off it. We have raised both these concerns previously. The risks posed by the Valve Tower and Bridge should be considered separately within the document.

2. At 3.3.1, how resilient will be the proposed wooden posts with livestock proof fencing? Would tastefully designed metal railings with mesh prove more robust to vandal attack?

3. At 3.5.3, effective gratings over Inlets and Outlets, will need to be absolutely tamper proof to protect entry by swimmers. Perhaps the gratings need to be alarmed to warn a control room of any interference. 5 m depth below top water level will not be a deterrent when water levels are reduced during draw-down.

4. There is no mention of how the operation of the Inlets and Outlets will generate currents in the reservoir, how these may change according to water depth, and how these will increase the risk to swimmers. If Southern Water plans for Recycled Effluent go ahead the Inlets and Outlets will be in daily use.

5. At 4.2.3 spacing of 200 m between lifebuoys is inadequate. It is based on an average running speed of 4 mph. However we cannot assume that the nearest rescuer will be young or fit. The UK National Water Safety Forum recommends that 100 m apart “is acceptable under normal conditions so that a potential rescuer is no more than 50 m from the equipment”.

6. At 4.5.1, what will be the scope of the Networked Video Surveillance System? It is important that this is not just directed towards buildings and structures, and access points to prevent vandalism. It also needs to be

directed across the water and reservoir banks to detect potential swimmers.

7. Where will the control room be for the NVSS operation? We believe that Portsmouth Water recently shut down their 24 hour operations centre in Havant. An operations centre needs to be close enough to the Reservoir for people to respond quickly to emergencies.

8. We are concerned that the Drowning Risk Review has not been discussed with Stakeholders. It should be raised at our next Stakeholders' Advisory Group Meeting on 10th September.

9. Before Condition 26 is discharged Stakeholders must have had the opportunity to discuss this in a meeting, and had time after that to submit comments to their Local Authorities. The matter then needs to come before the Local Authority Planning Committees for final consideration.

Kind regards