

Narinder,

I note that the developer has submitted a Drowning Risk Review and requested discharge of Condition 26

I **object** to the discharge of Condition 26 as the application is premature and insufficient information has been submitted to robustly assess the risks. Not all risks have been adequately considered for this water body located immediately alongside residential areas, with schools and pubs close by.

The risk of drowning has always been of major concern to the local community and key decisions that will impact the risk of drowning have still not been taken. The planning application to move the valve tower offshore has not been determined, and the developer has been unable to confirm if there will need to be a bridge to the tower as a means of escape (primary or secondary).

It is important that these matters are resolved before Condition 26 is discharged.

If these things are not to be resolved before the LPA consider the discharge of Condition 26 then the developer should be required to consider the worst case scenario in the drowning risk assessment (i.e. that the tower is offshore and that there will be a bridge). This is not the case for the document submitted.

Pg.4, 1.2.2 says they have used the principle of 'safety in design'. (i.e. designing out risks to remove or minimise the risk). It is clear that if the tower is to be placed off shore (with or without a bridge) the design risk mitigation hierarchy has not been followed, as the risk to the public could have been designed out by leaving the valve tower where it was in the outline design, within the southern embankment, where there was no related risk associated with youngsters, drunks etc. trying to swim out to the tower, or jump off a bridge. P. Water have previously confirmed that the original outline design of the valve tower within the southern embankment was safe.

A specific section needs to be added to the drowning risk assessment on the tower and its means of access/ emergency escape for workers (including whether or not there is to be a bridge to the tower). Plus consideration of the extra risk the tower (& bridge if to be present) poses to the public/ local community, specifically factoring in the close presence of the local schools, pubs and lots of families living close by. The tower will inevitably be a draw to try and swim out to and this must be properly considered in the drowning risk assessment.

Page 6 of the drowning risk review lists the risk they have identified, with sections that follow saying how they will control the risks. There is a summary presented in Appendix A of the risks and the control measures. Most risks start as high (red), with all assessed to be reduced to low (green) by the control measures described. With Appendix B suggesting that anything less than 5 (green) is safe. I do not agree that risks have been reduced to a safe level by the control measures proposed.

I have set out below some specific concerns setting out aspects that have not been adequately considered and why control measures are not currently robust. I hope that you will defer consideration of a decision on Condition 26 until more appropriate information has been submitted to the LPA.