

Valve Tower Safety Reserved Matters Application/25/00641

Comments 02.10.2025

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

Safety measures are an improvement on those presented with the original phase 3 application. Unauthorised access to the tower has been minimised to reduce the risk of drowning. However there are additional risks, and Condition 2 should not be discharged by the Local Planning Authorities until further information is available to enable all associated risks to be fully assessed.

1. Risk from currents and vortexes.

We need details of any currents or vortex that may form during the normal functioning of the outlets by the tower, below top water level, or during an emergency drawdown.

a) Whether currents and vortexes could be formed, under what operating scenarios, at which structures/ outlets, and how frequently this may occur?

b) Consider the risks any such currents and vortexes pose to an unauthorised swimmer (including a small child) or water craft and whether the measures proposed are adequate to address that risk?

c) Appendix B, page 24, refers to the risk of “Strong currents during drawdown”, followed by a vague reference to “Rate of drawdown not believed to be sufficient to pull someone under”. The risk of drowning is real and this vague statement is insufficient. Could the currents be sufficient to drawdown a small child? The design engineers will be able to calculate the currents created by normal operational drawdown and emergency drawdown and provide this information along with an assessment of the risk to a child or person with different body weights. The calculations and assessment to back up this statement and provide assurance on this key point must be provided to the Local Planning Authorities as an appendix to the report.

2. Risk of entrapment drowning

Appendix B, page 23, refers to the risk of ‘entrapment drowning’ and grilles over the intakes. It is essential that further details are provided to the Local Planning Authorities on the risks associated with normal operational drawdown and emergency drawdown. The information previously submitted with the Phase 3 application was inadequate to assess the adequacy of grills to prevent access (when the outlets are exposed during drawdown), page 23 refers to “grille design discussed with LPA”. The details of the grille design and specification should be included in the information to discharge Condition 2 as they are needed as a control measure for public safety.

3. Signage

There is reference in Section 3.1.1 to provision of signage to warn of submerged objects, but no reference to the fact that the submerged culverts and pipes could have adverse currents associated with them.

The text for sign A in Appendix A refers to; “There may be HAZARDS UNDER the WATER at this location. This WILL affect your ability to swim or help others”. Clarity should be provided by the applicant on what this refers to and whether adverse currents and vortexes are anticipated under any operational conditions.

4. Secondary means of access

There appears to be secondary means of access to the tower via a hatch in the roof. Is this the second authorised access point referred to on page 9, with the first being via the control house courtyard?

- a) In an emergency, if the culvert cannot be used, how will staff escape from the roof of the tower, given that it will not be possible to climb down its sides ?
Will there be a gate in the security fencing on top of the valve tower?
- b) Will there be some sort of retractable ladder that can be lowered from the roof, or a boat that can be lowered into the water, or other device?
- c) Also how will staff access the tower to carry out maintenance in an emergency, if they cannot access it via the culvert?
- d) Is a bridge planned to reach from the top of the tower to the top of the embankment? Stakeholders previously opposed this as it was thought to increase drowning risk to those who might be tempted to access it and dive off it.

5. CCTV surveillance

Given the high risks, insufficient information is provided in Section 3.1.2 on the provision of CCTV to monitor the valve tower. Local Authorities need to know:

- a) We need to know the location of cameras in order to assess their effectiveness in monitoring risks.
- b) How many dedicated cameras will be provided on the embankment crest directed at the valve tower, as one camera will not be adequate to give coverage on both sides of the tower in order to spot youths gathering or a person/ child swimming out to the tower in order to ensure a prompt response.
(Appendix B (page 24) refers to the CCTV being on the visitor centre, this is a long distance from the valve tower and would not provide adequate surveillance of both sides of the valve tower, including the side closest to the shore).
- c) That the quality of the image will be adequate to see anyone swimming in the water or hanging onto the chains around the structure during the day and night (i.e. that there will be some form of night vision system).
- d) Will the surveillance system include a sound facility which enables the camera operator to shout out a warning that an intruder has been spotted and the alarm raised to an appropriate responder?
- e) Will the system be monitored 24/7, 365 days a year, by whom and where, to ensure a prompt response to stop an unsafe situation developing, or respond in an emergency?
- f) How will the cameras be protected from vandalism making them inoperative?

6. Recreational use of the water.

Although a decision has been made (see section 2.3), to ban all water sports, there continues to be community pressure for non-powered, supervised water sports, such as

canoeing or sailing in the reservoir. Between 2009 and 2020 Portsmouth Water repeatedly committed to stakeholders that the opportunity for future supervised use of the water by schools, youth groups, sea cadets etc. would be kept open. It is not certain how this will be decided in the longer term.

It was also recognised by managers at Portsmouth Water that it would be impossible to completely stop youths and adults carrying canoes, paddle boards and potentially even jet skis in from the adjacent residential areas and using the water in an unauthorised manner when the visitor centre is closed. There is a risk that gates controlled with a combination lock could be compromised if the code for the gate becomes known (Section 3.2.2 refers). Appendix B – additional controls column refers to ‘Patrols’ but no detail is provided in the report on how often the area will be patrolled during the day and at night?

The information provided to the Local Planning Authorities needs to specifically consider whether the preventative measures proposed are sufficient to address this additional risk.

7. Risks during drawdown

Mud substrate will be exposed during drawdown when NO water will be present between the shoreline and the valve tower. No information is provided on the substrate that will be exposed and any health and safety risks related to it. Rip-rap covered in weed will be slippery. Presumably where the rip-rap ends the base of the reservoir will be slippery mud and with time covered in deep mud. The offshore valve tower will remain a draw for unauthorised access even during drawdown.

There is no information in the main report on what the risks will be during drawdown and how they will be addressed. The information in Appendix B page 25/26 is too vague. The increased risks that the valve tower poses during drawdown must be considered more fully and addressed.

8. Risk to swimmers

Section 2.1 confirms that the tower is just 19.5m offshore at its closest point, with the water depth around the tower ranging under normal operation from 2.6 to 3.7m deep. This confirms that the tower is very close the shore and certainly deep enough to swim and drown in. It is inevitable that there will be individuals tempted to swim out to, and/or around the tower, presenting a significant risk of drowning. Rip-rap will not be a sufficient deterrent to determined individuals. Unfortunately education and warning signs cannot provide complete protection against anti-social behaviour.

9. Throwlines

The distance from the shore to the valve tower is 19.5m at its closest point. It is not practical for to throw a ‘throwline’ that distance. The need to keep the throwline cabinet locked will delay any rescue attempt.

10. Delay in consultation

If the report to discharge Condition 2 was submitted to the Local Planning Authorities on 6/8/25 why has it taken so long to share it with stakeholders and councillors?

- Especially when the development has already commenced and it was councillors on the planning committee reacting to concerns from the community that required the addition of the safety condition to the planning consent for the Phase 3 application.

In view of the complexities of the risks involved, we think that this should be passed to the Planning Committees for final deliberation and decision.