

Toddbrook Reservoir: Planning Application Public Comments

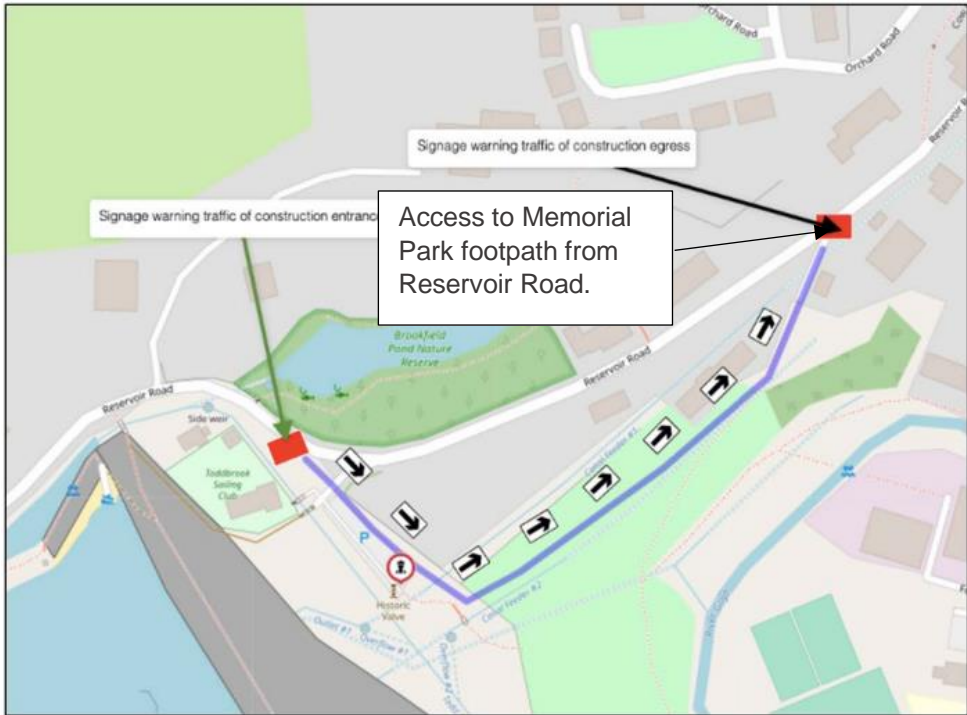
The Canal & River Trust has monitored the submission of public comments on the planning application for Toddbrook Reservoir, and has reviewed 50 public comments submitted up to and including January 2022. Within these, the Trust notes a range of comments, including support for the proposals, objection to the proposals, and neutral or mixed comments demonstrating support for certain areas with objections or concerns regarding specific aspects.

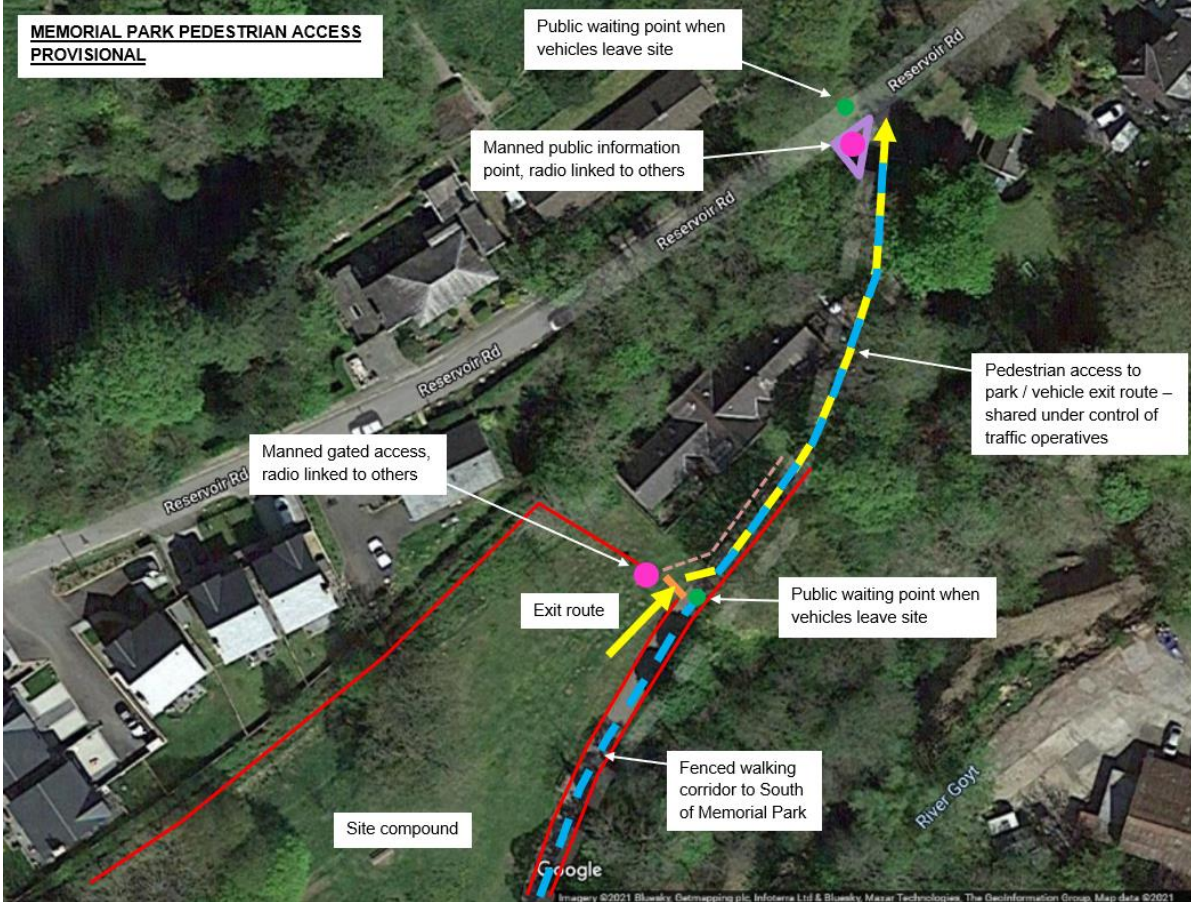
The table below summarises the key themes raised through public comments, alongside the Trust's response at this stage. The Trust continues to engage with the Local Planning Authority on these matters as part of the planning process.

Key theme	Description of comments received	Canal & River Trust response
<p>Management of construction traffic and pedestrian safety</p>	<p>The most common theme across public comments was concern regarding the management of increased traffic during the construction phase, particularly along Reservoir Road. Concerns were raised regarding pedestrian safety and inconvenience to local residents.</p> <p>Key issues raised include:</p> <ul style="list-style-type: none"> - the identification of Reservoir Road as a suitable construction access route; - specific concern around the existing safety of the junction between Whaley Lane and Buxton Road, and that issues may be exacerbated by construction traffic; and - the width of Reservoir Road, raised in the context of Heavy Goods Vehicles using the road. 	<p>The Trust notes and appreciates the comments submitted regarding the need to carefully manage construction traffic. The safety of pedestrians, local residents, other road users, and our workforce is of the utmost importance.</p> <p>The Trust also acknowledges the challenging environment in which this project needs to be constructed. Despite its limitations, utilising Reservoir Road was found to be a safe route and preferred when compared to other routes through assessment by our professional team.</p> <p>The Trust has reviewed the Construction Traffic Management Plan (CTMP), as submitted as part of the planning application, in light of these comments. The CTMP notes the possibility of future amendments should they be appropriate. It also explains that liaison with neighbours and interested parties will continue throughout the project, as information is updated and as the project develops.</p> <p>In response to comments received, the Trust highlights the range of mitigation measures set out in the CTMP, which have been designed and committed to in order to reduce inconvenience and ensure safety throughout the construction phase. These measures include:</p> <ul style="list-style-type: none"> - A Stop/Go system, manually operated by accredited Traffic Management operatives in contact via radio control, on Reservoir Road and the junction with Whaley Lane. - The appointment of a Traffic Liaison Officer to act as a point of contact for local residents and take responsibility for the coordination of construction vehicle movements. - A proposed Communications Hub, outside the site boundary, to be a central point for liaison with local residents, allowing in-person interaction with the local community, should live updates of construction plans be required, and offering the opportunity to provide feedback on the works. - Construction vehicles using agreed routes within designated hours to manage disruption.

Key theme	Description of comments received	Canal & River Trust response
Management of construction traffic and pedestrian safety (cont.)	<p>Specific comments have been submitted regarding the proposed narrowing of the existing pavement at the lower end of Reservoir Road. It is noted that this path is used by schoolchildren, parents with pushchairs, and pedestrians with visual impairments.</p>	<p>The CTMP proposes to temporarily narrow a section of pavement. This would be achieved through amending car parking markings, to facilitate the continued safe street parking for local residents during the construction phase, while still allowing safe pedestrian access. This proposed measure responds to feedback and consideration of maintaining existing parking provision and ensuring the road is wide enough to safely accommodate larger construction traffic. The width of the temporarily narrowed pavement has been discussed in meetings with the local highway authority. These changes would be temporary, with the road and pavement fully reinstated upon completion of the construction works.</p>
	<p>Specific comments have been submitted regarding perceived potential impacts to existing parking provision on Reservoir Road during the construction phase.</p>	<p>The Trust's proposals have been designed to allow for the continued safe use of existing parking on Reservoir Road for the vast majority of the construction period. All parking and vehicle loading / unloading associated with construction will be accommodated within the project site boundary. Additional overflow parking for contractors and visitors to the site will be provided either at the existing pump compound, or at the Transshipment Warehouse, should it be required. This will mean that construction traffic does not occupy existing public parking spaces.</p> <p>In addition to this, and as noted above, to maintain the existing roadside parking outside properties towards the lower end of Reservoir Road (closer to the junction with Whaley Lane), the proposals involve temporarily narrowing the width of available pavement to allow for continued roadside parking. As part of the application process, the Trust has held further discussions with the local highway authority, and has agreed to implement a small lay-by area, to replace the loss of any unrestricted parking outside of properties mid-way up Reservoir Road.</p> <p>The Trust notes a high proportion of the remainder of Reservoir Road is subject to double-yellow lines, but acknowledges that currently a number of vehicles utilise unrestricted parking on the public highway. Given the proposals set out in the CTMP, the Trust does not anticipate impacting the number of vehicles that are able to park on Reservoir Road or preventing access to private off-street parking for the vast majority of the construction phase. Where temporary parking restrictions are required (such as for the delivery of large equipment), these will be sought and publicised through Temporary Traffic Regulation Orders. Any affected local residents will be notified in advance and restrictions kept to a minimum. Alternative parking can be provided at the Transshipment Warehouse if required.</p>

Key theme	Description of comments received	Canal & River Trust response
Management of construction traffic and pedestrian safety (cont.)	<p>Specific comments were submitted regarding the timing of a traffic survey being undertaken during school holidays, and therefore not returning results representative of term-time traffic.</p>	<p>The Trust acknowledges the timing of the traffic count survey undertaken by the Principal Contractor on Reservoir Road. The results of this assessment were one of multiple factors that informed our traffic management proposals. While the Trust notes the count results may have differed during term time, the mitigation proposals - such as installing a Stop/Go system manually operated by accredited Traffic Management operatives - would remain the same as they have been designed to accommodate significant volumes of traffic, beyond those identified in the survey. The interpretation of the traffic count results presented in the CTMP notes that traffic levels on Reservoir Road are at a high level throughout the day.</p>
	<p>Specific comments were submitted regarding the potential lowering of the road level of Whaley Land underneath the railway bridge, at the junction with Buxton Road.</p>	<p>The proposals set out in the planning application include the potential for lowering the road level underneath the railway bridge at the junction of Whaley Lane and Buxton Road. Following the submission of our planning application our team has continued to explore this option, including through further engagement with the local highway authority. The potential benefit of undertaking works to lower the road level would be to allow for larger vehicles to access the site, reducing the overall volume of vehicle movements.</p> <p>However, the Trust recognises that these works themselves would result in temporary disruption. Feedback has been received from the community on this, along with concern about potential longer term impacts of larger HGVs using this junction.</p> <p>In light of this, and alongside further feasibility assessments, the Trust has now agreed with the local highway authority to no longer progress the option of lowering the road level under the railway bridge.</p>
Accessibility concerns	<p>The most common single issue raised through public comments is the proposed temporary closure of the existing pedestrian access to Memorial Park from Reservoir Road.</p> <p>Comments note this prevents access to a footpath well-used by schoolchildren and pedestrians with accessibility requirements, including visual impairments.</p>	<p>The proposals set out in the planning application did show the closure of the pedestrian access to Memorial Park from Reservoir Road, as it is to be used as an egress point for construction vehicles. This is shown in Figure 2 of the CTMP, copied below for reference. Given the width of the route, at the time of producing the CTMP it was not considered viable to ensure segregated pedestrian and HGV routes.</p> <p>However, the Trust acknowledges the strong level of feedback received on this issue. The Trust has reviewed the traffic management proposals and is now committing to keeping this route open for pedestrians. The details of this are still being developed by the Principal Contractor, but will likely involve the presence of traffic operatives to manage separate use of the access by pedestrians and construction vehicles. When vehicles leave the site, radio control between operatives would allow this to be done safely, with pedestrians asked to wait for a short period if necessary.</p>

Key theme	Description of comments received	Canal & River Trust response
<p>Accessibility concerns (cont.)</p>	<p>While an alternate route into the park remains open via Wharf Road, public comments raise concern that the condition of this route is not suitable for all pedestrians.</p>	<p>The Trust also notes the comments received on the condition of the access to Memorial Park via Wharf Road, in the context of this being an alternative route should access to Memorial Park from Reservoir Road be temporarily closed. Given the amendments to the proposals (described above) to now maintain safe access through Memorial Park from Reservoir Road, it is considered beyond the scope of this project to undertake any improvement works to the route from Wharf Road.</p>  <p>The map illustrates the proposed route from Reservoir Road to Memorial Park. A blue line indicates the path, starting from Reservoir Road, passing through a 'Side weir' and 'Roddwood Sailing Club', and ending at Memorial Park. A red square on Reservoir Road marks the 'Access to Memorial Park footpath from Reservoir Road'. Two callout boxes indicate 'Signage warning traffic of construction entrance' and 'Signage warning traffic of construction egress' along the path. Other features include 'Brookfield Pond Nature Reserve', 'Orchard Road', and 'Wharf Road'.</p>

Key theme	Description of comments received	Canal & River Trust response
		<p data-bbox="920 341 2063 400">Please see below for an updated image, showing the management of pedestrian access through memorial Park from Reservoir Road.</p>  <p data-bbox="943 453 1279 496">MEMORIAL PARK PEDESTRIAN ACCESS PROVISIONAL</p> <ul data-bbox="943 443 2101 1337" style="list-style-type: none"> Public waiting point when vehicles leave site Manned public information point, radio linked to others Pedestrian access to park / vehicle exit route – shared under control of traffic operatives Manned gated access, radio linked to others Exit route Public waiting point when vehicles leave site Fenced walking corridor to South of Memorial Park Site compound <p data-bbox="1458 1326 2085 1342">Imagery ©2021 Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group, Map data ©2021</p>

Key theme	Description of comments received	Canal & River Trust response
<p>Noise pollution and vibration</p>	<p>Public comments highlighted concerns regarding potential noise pollution created by construction activities, including the operation of machinery and vehicle traffic.</p> <p>In addition to this, public comments have noted that noise pollution caused by piling and heavy vehicles tend to disorientate and add to the problems faced by those who are visually impaired.</p> <p>Concern was also raised regarding noise from water on the new infrastructure once built.</p>	<p>As with traffic management, the Trust acknowledges the challenging environment in which this project needs to be constructed, including the proximity of residential properties to the available working area.</p> <p>When considering these public comments, the Trust has reviewed the mitigation measures described in the outline Construction Environmental Management Plan (CEMP), submitted as part of the planning application. The outline CEMP confirms that best practical means (BPM) mitigation will be implemented to control construction noise and vibration at source, as specified in BS5228-1 Annex B. This will involve measures such as:</p> <ul style="list-style-type: none"> - Planning the hours of work in consideration of land use in the area. - Providing prior notice to residents ahead of any particularly noisy or high vibration works. - Using screening and acoustic barriers. - The selection of low vibration equipment and methods where possible. - Ensuring equipment is turned off when not in use, and reducing the amount of equipment used simultaneously. - Locating equipment away from residential properties where possible. - The use of less intrusive alarms, such as broadband vehicle reversing warnings, rather than tonal alarms. <p>These measures will be further developed through a detailed CEMP.</p> <p>In addition to this, the Trust has appointed independent chartered building surveyors (Peacock Stevens) for the project. They will be providing independent advice on the impact of the works and site accesses during construction – the scope of which will include aspects such as noise, concerns regarding property damage, and the proximity of works to adjacent homeowners. Condition surveys before and after construction have also been offered to properties along Reservoir Road, as assurance regarding local residents’ concerns of potential damage as a result of construction works.</p> <p>With regard to operational noise from the new infrastructure, the Environmental Statement sets out the assessment undertaken and proposed mitigation. The effect of noise from the spillway is assessed in the Environmental Statement as not significant.</p> <p>The mitigation measures have also been subject to review by High Peak Borough Council Environmental Health, who have raised no objection to the planning application, but have recommended planning conditions to address matters of noise and vibration. The Trust recognises these conditions as necessary.</p>

Key theme	Description of comments received	Canal & River Trust response
Local amenities	<p>Public comments raised the amenity importance of features associated with the reservoir, such as the area referred to as 'Whaley Beach'. Comments also linked this amenity value to wellbeing and the local economy.</p>	<p>The Trust notes these comments, and considers them supportive of the need to restore Toddbrook Reservoir. The Canal & River Trust promotes the wellbeing benefits of being by water.</p> <p>In recognition of the community value provided by the reservoir, careful design consideration has been given to re-providing opportunities for ancillary uses, such as through relocating the sailing club facilities and a beach area for public access.</p>
	<p>Public comments also included requests for the implementation of additional features that benefit the surrounding area, such as a footpath around the reservoir or a 3G football pitch to replace the area of the park which will be used during construction.</p>	<p>The primary focus of the project and associated planning application is to restore Toddbrook Reservoir, to ensure its safe operation for years to come. Within this, the team has identified potential benefits to be delivered, such as improved connectivity, more usable space within Memorial Park, and the ancillary benefits of the reservoir described above. Community facilities which are impacted by the works will be replaced or reinstated as part of the project, including the sailing club, football pitch, and park area.</p> <p>Other suggested initiatives, such as a new circular footpath, are outside of the project boundary and the Trust's land ownership, and are therefore considered beyond the scope of this application.</p>
Perceived flood risk	<p>Public comments raised concerns regarding a perceived increase in flood risk as a result of the development. Comments also noted the need for a maintenance regime post-completion.</p>	<p>Given local residents' experience of the 2019 incident, the Trust appreciates these concerns.</p> <p>The proposed new spillway design, as set out in the planning application, has been developed in line with necessary reservoir standards to withstand extreme flows of water, in what is described as a Probable Maximum Flood (PMF) event. This requires there to be capacity for overflow from the reservoir through rainfall incidents significantly more severe than those of August 2019. This is consistent with the latest UK reservoir legislation, and the design process has been overseen by an Independent Qualified Civil Engineer.</p> <p>We are engaging the Environment Agency on our modelling, to review our calculations and methods as part of the planning process.</p> <p>The Flood Risk Assessment submitted with the application describes the assessment of flood risk and surface water drainage (including accounting for climate change), and explains how this has been accounted for in the design of the proposed Scheme.</p>

Key theme	Description of comments received	Canal & River Trust response
		<p>The assessment concludes that the proposals:</p> <ul style="list-style-type: none"> - have negligible impact on the downstream risk of fluvial flooding; - would result in a reduction of the risk from surface water flooding; - would not impact on the risk of groundwater flooding; and - would result in considerable reduction of the risk of flooding from uncontrolled release of water from the reservoir in extreme floods, as they are to improve the reservoir safety for future operation. <p>Future maintenance of the reservoir will be in accordance with the requirements of the Reservoirs Act.</p>
<p>Biodiversity loss</p>	<p>Public comments noted that, since the reservoir water level was reduced following the 2019 incident, changes in vegetation and biodiversity around the reservoir have been observed. Concern was raised regarding the refilling of the reservoir resulting in a loss of this biodiversity.</p>	<p>Toddbrook Reservoir is a designated Site of Special Scientific Interest (SSSI), due to the presence of a rare plant – Dwarf bladder-moss – which is only found in a handful of sites in the UK. This species remains dormant whilst the reservoir is being held at a lower water level, but is reliant on the typically fluctuating levels of Toddbrook in order to thrive. In this way, the continued presence of Dwarf bladder-moss will be sustained by the restoration of the reservoir, as this will support the species' lifecycle. Conversely, not restoring the reservoir could jeopardise the long-term presence of Dwarf bladder-moss in the area.</p> <p>The Environmental Statement sets out the assessment of potential impacts to ecology and biodiversity associated with the proposed scheme. The relevant Environmental Statement chapter concludes that the potential residual effects on ecology from both the construction and operational phases will be negligible, once embedded design and measures in the Outline CEMP have been implemented.</p> <p>The Trust is pleased to note that the Scheme presents an overall biodiversity net gain of 15%.</p>
	<p>Public comments raised concern over the loss of mature trees in Memorial Park to facilitate construction.</p>	<p>The Trust acknowledges that it is unfortunate that some mature trees would need to be removed to allow the construction of the Scheme. This would be kept to a minimum.</p> <p>An Arboricultural Assessment has been undertaken, and the environmental effects of tree removal mitigated where possible through significant replacement planting and habitat creation, on and off site. Engagement with High Peak Borough Council has informed these proposals.</p>

Key theme	Description of comments received	Canal & River Trust response
Visual impact	<p>Public comments raised concern regarding the visual impact of establishing a construction area within Memorial Park and the permanent presence of new spillway infrastructure.</p>	<p>The Trust notes comments received on the potential visual impact of the project. Key changes made during the pre-application design development phase were in response to consultation feedback on this issue. These included cladding much of the exterior of the new spillway in stone, and revising the landscaping and heights of the spillway to reduce the amount of structure visible above ground level.</p> <p>The Environmental Statement (Chapter 5) sets out the assessment of potential visual impacts and development of associated mitigation. Mitigation measures during the construction phase are described in the outline Construction Environmental Management Plan. This includes the provision of suitable fencing around the site.</p>
	<p>A number of public comments regarding potential visual impacts cited the proposed relocation of the sailing club as adversely affecting views. Specific comments included the location of the facilities, the cladding of the building, site lighting, and the positioning of windows.</p>	<p>The relocation of Toddbrook Sailing facilities were consulted on through the pre-application stage. While the proposals were informed by feedback received from the Trustees of the sailing club, the nearest neighbours to the site, and the wider community, the Trust acknowledges that some local residents in close proximity to the proposed site retain concerns about the location and design of the facilities.</p> <p>The Sailing Club Design and Access Statement describes the design of the facilities, how these were informed by consultation, and how they seek to mitigate potential impacts to local residents. This includes the location, form, and material choice for the facilities.</p> <p>For example, relocating the facilities as close as possible to the existing location was considered during the design development. However, this was found to not be preferable for relocation due to the topology (1:6 gradient) which would present issues with accessibility and a health & safety risk when moving boats, as well as operational issues with the transporting of boats to the new launch area due to increased distances. The proposed location mitigates against these issues as it is a level site and closer to the launch area.</p> <p>New facilities have been designed to face away from Reservoir Road, focussing the view across the boat park and towards reservoir, and preserving the privacy of local residents. The positioning of windows has been considered in response to feedback from local residents, to avoid overlooking.</p> <p>External lighting will be designed such that it meets The Chartered Institution of Building Services Engineers (CIBSE) – Society of Light and Lighting (SLL) Code for Lighting and the Institution of Lighting</p>

Key theme	Description of comments received	Canal & River Trust response
		<p>Engineers Guidance Notes for the Reduction of Light Pollution in line with relevant environmental zone requirements.</p> <p>The Trust acknowledges the comments received on the indicative cladding of the Sailing Club building presented in the application, and appreciates the precise details and specification of cladding may be subject to planning condition. The rationale and justification for the indicative cladding is set out in the Sailing Club Design and Access Statement. Recognising the feedback received during the planning process, stone is to be included as an element of the elevations together with the metal cladding.</p>
<p>Contamination / pollution</p>	<p>Public comments received on this theme included where soil (waste) from the dam will be disposed of, dust and dirt, risk of gas and asbestos, and the issue of public sewers which run alongside the site.</p> <p>Local residents expressed concern that HGVs carrying construction materials will result in dust and contamination to houses near to the project.</p>	<p>The Construction Traffic Management Plan notes that hard surface areas will be constructed on site to mitigate mud and debris leaving the site. A wheel washing facility will be provided for vehicles when they exit the construction area, and regular road-sweeping will be undertaken to keep Reservoir Road clear and in suitable condition. In-person traffic operatives will be on site to help manage the movement of construction vehicles and provide information and reassurance to local residents and other road or pavement users.</p> <p>The proposals also involve reusing as much spoil on site as possible, reducing the need to transport waste materials off site.</p> <p>The outline Construction Environmental Management Plan sets out a range of measures which would be developed and implemented to prevent pollution and disturbance during the construction phase. For example:</p> <ul style="list-style-type: none"> - as far as reasonably practicable, only biodegradable hydraulic oils will be used in equipment working in or over watercourses; - refuelling of plant and machinery onsite would be carried out in a designated area; and - any hazardous materials (such as fuels, oils and chemicals) will be stored in a secure area with suitable secondary containment (e.g. drip trays, bunds).

Key theme	Description of comments received	Canal & River Trust response
<p>Project need</p>	<p>Some public comments queried whether it was necessary to restore Toddbrook Reservoir.</p>	<p>There is a clear operational need for the Trust to restore Toddbrook Reservoir, the primary need being for it to continue to play an important role in feeding the Peak Forest and Macclesfield Canals. The reservoir typically supplies over a third of water to these canals and is therefore vital to their continued operation.</p> <p>In addition to this primary function, the Trust also recognises the community value of the reservoir, such as through the leisure and amenity opportunities it provides. These ancillary uses of the reservoir are important and have been considered through the development of our proposals, such as through the re-provision of facilities for Toddbrook Sailing Club to allow for their continued use of the reservoir.</p> <p>The Trust also has a legal obligation under the Reservoirs Act to make improvements to the reservoir spillway in the interest of public safety. The development of the Trust's proposals set out in this application have been overseen by an independent Qualified Civil Engineer.</p> <p>Some comments referred to instead discontinuing the reservoir, as it is perceived to avoid a number of challenges. However, the Trust notes that, notwithstanding the importance of the reservoir referred to in the paragraph above, discontinuing the reservoir was considered by our project team at an early stage of optioneering. In addition to significantly reducing water supply for the regional canal network, impacting the existing SSSI, and failing to re-provide many of the ancillary benefits of the reservoir, it was also found that the engineering required for discontinuation would involve the movement of significant volumes of earth and require associated construction works. It would therefore still be considered a major construction project, and likely result in many similar challenges as restoring the reservoir.</p>

Key theme	Description of comments received	Canal & River Trust response
<p>Legal framework to ensure reservoir safety</p>	<p>Comments have been received regarding how the safety of the proposals, and the reservoir as a whole, is assessed.</p>	<p>The dam and reservoir are subject to the Reservoirs Act 1975, which provides the legal framework to ensure its safety. The Environment Agency is the regulator for the Reservoirs Act. Safety works required under the Reservoir Act may separately require Planning Permission (and indeed any other consents that may be needed, such as abstraction licences, or the approval of Natural England) as is the case here, but the safety aspects of the design and works are governed by the Act.</p> <p>Following the incident in August 2019, the dam and reservoir were inspected under Section 10 of the Act and a report made which contained recommendations made to ensure the safety of the dam. The inspection and report were made by a Qualified Civil Engineer (QCE), who is appointed by the Secretary of State to the (All Reservoirs) panel of engineers established under the Act for such purposes. The inspection considered all aspects of the dam and reservoir, and it included a number of recommendations, not just the replacement spillway, which is the subject of the planning application. The planning application Design and Access Statement includes a confirmatory statement by the QCE accepting the design of the proposed spillway system.</p> <p>The other recommendations included investigations to provide or enhance knowledge about the condition of the dam, to enable assessments of its performance to be made, and remedial or upgrade works to be designed. This includes removing the auxiliary spillway slabs and repairing the embankment that was infilled by the bags dropped by helicopters, as well as works to the core. In addition, at an appropriate time prior to refilling, equipment will be installed to monitor the performance of the dam. This will significantly enhance the ability to monitor its condition and performance.</p> <p>Safety recommendations arising from an inspection under the Act are required to be supervised by an independent engineer appointed by the Secretary of State to the panel of engineers established under the Act for such purposes. They are then required to certify under the Act that the measures have been completed. The QCE is retained to supervise and certify when they are satisfied that the measures have been taken. The assessment and design reports prepared by the Trust's design consultant to address the recommendations are subject to review and acceptance by the QCE.</p> <p>The investigation and design of all necessary works to restore the reservoir to safe operational condition have been done by highly qualified engineering specialists employed by the Trust. As explained, assurance of safety of the full spillway and dam system is addressed by the overseeing role of the independent QCE appointed under the Reservoirs Act.</p>

Key theme	Description of comments received	Canal & River Trust response
<p>How the construction works have been sequenced</p>	<p>Comments have been received regarding the safe ordering of construction work, including the raising of the dam crest already completed, and when the spillway installation and dam repairs will be done.</p>	<p>The raising of the dam crest (already completed) was to provide sufficient assurance of safety to the dam in the most extreme storm circumstances, so was a necessity to install prior to repair works being designed and implemented. This installation, together with keeping reservoir water levels low by reducing inflows and using pumps when needed, further reduces the already very small probability of water overtopping onto the auxiliary spillway.</p> <p>Regarding the proposed works, the new overflow system (the spillway) is a necessity to manage flood flow and ensure the safety of the dam, and therefore must be installed first. Were the concrete to be removed from the auxiliary spillway, and the reservoir be subject to an extremely high order flood event causing overflow to the auxiliary, then this would be of severe threat to the integrity of the dam.</p> <p>The construction sequencing planned (spillway construction prior to the auxiliary spillway removal) is the only safe sequence in which to undertake the works, and the only one that would be permitted by the QCE for reasons of public and reservoir safety.</p>