



7 April 2025

Karen Syrett
Joint Head of Planning
Planning Policy Team
Colchester City Council
Rowan House 33 Sheepen Road, Colchester CO3 3WG

By Email and Post: Karen.Syrett@colchester.gov.uk; Sandra.Scott@colchester.gov.uk

Subject: Objection to Local Plan Allocation of 300 Additional Houses on West Mersea Colchester.

Dear Karen Syrett, Sandra Scott and Planning Policy Team,

I write on behalf of West Mersea Town Council.

West Mersea Town Council strongly objects to the proposed Local Plan allocation of an additional 300 houses on West Mersea, in addition to the 200 already approved. This level of development poses an unacceptable threat to the highly protected Blackwater Estuary, a site of immense ecological significance.

The Blackwater Estuary benefits from multiple overlapping environmental protections, including:

- **Special Area of Conservation (SAC)** – Requires a Habitats Regulations Assessment (HRA) and cannot proceed if there is any adverse effect.
- **Marine Conservation Zone (MCZ)** – Designated as "In Recovery" and must not be further compromised.
- **Ramsar Site** – The UK is legally bound to prevent its degradation under international commitments.
- **Site of Special Scientific Interest (SSSI)** – Natural England has the power to object to damaging activities.
- **Shellfish Water Protected Area (SWPA)** – Requires high water quality under the Water Framework Directive (WFD) and UK law.
- **The Bathing Water Regulations 2013** – Ensures that designated bathing waters, such as those around West Mersea, maintain high water quality standards to protect public health and the environment.

These protections demand that any development meets strict legal tests, which this proposal is unlikely to satisfy given the significant risk to water quality, marine life, and

the local oyster industry. Furthermore, the Food Standards Agency (FSA) has already raised concerns (2024) to Colchester City Council about the impact of additional housing on sewerage loading. Natural England has also expressed the need for evidence that sewage treatment infrastructure, including the Water Recycling Centre (WRC), can handle new development without increasing the nutrient and pollutant load, which could severely impact designated sites such as the Essex Estuaries SAC and the Blackwater MCZ.

We must stress that the West Mersea WRC is already overburdened. The additional 300 houses would exacerbate this issue, resulting in increased bacterial and viral loads, degrading water quality, and harming marine life and bathing waters. Ofwat has stated that planning should not proceed without adequate infrastructure in place on Mersea, and the WRC does not have the capacity to support this level of development.

Additionally, this proposal could contravene the **Urban Waste Water Treatment Regulations (UWWTR)**, which require sufficient wastewater treatment capacity to prevent environmental harm. Overloading the WRC could lead to untreated or insufficiently treated wastewater entering the Blackwater Estuary, in direct violation of these regulations. Moreover, it would breach the **Water Environment (Water Framework Directive) (England and Wales) Regulations 2017**, which mandate that water bodies must not deteriorate in quality due to pollution or excessive nutrient loads. The cumulative impact of the proposed development would threaten the long-term ecological health of the Blackwater Estuary and the local economy reliant on sustainable marine activities.

Given these significant environmental and infrastructural constraints, we urge Colchester City Council to remove the allocation of these additional 300 houses from the Local Plan. Proceeding with this level of development would not only contravene environmental protections but also expose the Colchester City Council to legal challenges and reputational risk.

We request a meeting at the earliest opportunity to discuss this matter further and look forward to your response.

Yours sincerely,

Kirsty Wadsworth
Town Clerk

Copy to:
Chief Executive, Colchester City Council
Leader, Colchester City Council
Sir Bernard Jenkin MP
City Councillors Powling, Davidson, Parsons
Cllr. Jowers Essex County Council